To Chair Patterson and members of the Senate Health Committee:

As a dedicated dental assistant to the field of dentistry and the safety of dental patients for over 35 years, I am disheartened that the first solution to a shortage of dental assistants has been to lower the standards and examination oversight of the dental assistants that provide healthcare for Oregonians, and this is exactly what HB 3223 does.

The shortage of dental assistants is not due to lack of available educational opportunities, nor to the lack of alternative routes that allow for training in offices while earning pay. It is not due to the requirement to pass exams. It is due to a lack of applicants wanting to enter the dental field as a dental assistant and the many assistants that have left the field to follow other career paths. The solution to the shortage lies in scrutinizing the reasons for this.

According to the 2022 American Dental Association (ADA) Survey, the top 4 reasons that dental assistants are leaving the field are:

- Insufficient pay
- Feeling overworked
- Workplace culture
- Lack of opportunity for growth

HB 3223 would exacerbate every one of these reasons, thus perpetuating an insufficient workforce.

For the 35+ years that I have been a dental assistant, Oregon dentists have been able to hire assistants and train them on-the-job. However, as part of their job protecting "all communities in the State of Oregon by equitably and ethically regulating dental professionals," over the years the Oregon Board of Dentistry has implemented additional examinations to confirm competency and knowledge to prevent harm to patients while expanding the scope of practice for dental assistants.

These examinations and the resulting credentials have provided growth opportunities for assistants, and a resulting respect for the profession. More importantly, they ensure that the assistants allowed to provide the expanded functions know how to do so safely. This is the way to entice assistants to the field.

For applicants that want to be dental assistants but do not have access to educational programs due to funding or geographical constraints, the required "check-offs" for dentists to train them on-the-job were recently reduced. To now remove the examinations that confirm understanding of cross-contamination prevention (in the wake of a global pandemic) and ways to prevent damage to the teeth and supporting structures while performing these skills violates the premise of "ethically regulating dental professionals." This should not just be the mission of the Oregon Board of Dentistry, but of every doctor, hygienist, assistant, and legislator that contributes to laws governing this.

Oregonians deserve to be safe when go to their dental offices. They deserve to know that when they trust in the competency of their healthcare professionals, their trust is not misplaced. Licenses of dentists and hygienists are required to be prominently displayed, so patients can see that their dental providers are adequately trained and skilled. Several of the services that dental hygienists preform (including radiographs and placing pit and fissure sealants) are also performed by Expanded Function Dental Assistants. Why would we require these skills to be

covered under a license for a dental hygienist and not even require dental assistants to complete an examination confirming understanding of skill competency and patient safety?

Dental assisting programs accredited by the Commission on Dental Accreditation (CODA) require over 900 hours of training, assessment and examination. They cover radiological proficiency, radiation safety and protection, every expanded function skill, cross-contamination prevention, oral and dental health, ways to prevent damage to teeth and periodontium, and professionalism. To maintain their accreditation status, they undergo thorough scrutiny and evaluation every 7 years. If the answer is to remove examinations, remove them ONLY for the graduates of these programs. For the protection of Oregonians seeking dental treatment, assistants pursuing credentials via an alternative path should still be required to pass the examinations to ensure equivalent competency.

This bill is being proposed as a way to remove barriers to the dental profession. I truly believe it will have the opposite effect. As a dental assistant that began her career in 1987 when many DAs were trained on the job, I am deeply afraid that we are regressing and repressing the dental assisting profession to where it was 40 years ago. In the last 4 decades, dental assistants across this country have fought hard to raise the level of respect and professionalism in their field. This has resulted in the Expanded Function Certificate, and the currently approved Restorative Function Certificates now available for dental assistants in Oregon. Proposals to expand certification even further, allowing dental assistants to administer nitrous oxide gas and provide local anesthesia are currently being considered. These pathways to professional growth, job enhancement and salary advancement are the ways to entice applicants to the dental assisting profession. Removing qualifying exams threatens the future of this type of progression to the dental assisting field.

I completely agree with the comments made by Senator Hayden questioning why someone would enter the dental assisting profession, taking on the responsibility of the health of others, and participating each day in the hard work of the dental assisting job when they can work at the local hardware store for similar pay and respect in their field. As a long time dentist in the very dental community that I too have been a part of, Senator Hayden is aware of the hard work that dental assistants do, and of what a well-trained, qualified, professional dental assistant can bring to an office. Devaluing this by reducing the standards currently in place for the Expanded Function Dental Assistant credential is not only detrimental to the potential advancement of the DA profession (which will impact access to care in the future), but is also an insult to the very assistants that contribute so much to the dental care our patients receive.

As a dental assistant of more than 35 years with a passion and commitment to the field of dentistry and my profession, I want to see the number of men and women following this career path increase exponentially. I want the next generation of dental assistants to experience the expansion in their scope of practice that I have throughout mine. I want them to be committed to constantly increasing their skills and knowledge through continuing education courses. I want them to be valued members of their dental team by the doctors they work for. I want them to feel respected in their working environments and see the respect for what they bring to the practice conveyed through higher pay. Most importantly, I do not want to see the safety of the public compromised.

I truly believe that these are the qualifications that will increase the number of dental assistants and end the shortage we are currently experiencing.

HB 3223 is NOT the answer. Please do what is best for Oregonians and do not pass this bill!

Respectfully, Kym Peterson