

2 March, 2021  
House Committee on Health Care  
900 Court Street NE  
Salem, Oregon, 97301

Subject: Significant Concern with HB 2528  
Chair Prusak, Vice-Chairs Hayden and Salinas,

We are group of 8 pediatric dentists working in 5 privately owned dental practices named Acorn Dentistry for Kids. Our clinics are located in the communities of Hillsboro, Keizer, Salem, Silverton and Corvallis. We treat thousands of Medicaid patients per month in our practices.

Today I write with significant concerns on the Dental Therapy bill, HB 2528.

The primary purpose of this bill appears to be an attempt to increase access to care among state Medicaid patients. We have three primary concerns:

1. Several of the current Medicaid Dental plans are limiting access to care for the patients they are tasked with helping. In this year alone, we have pursued and been denied contracts with Advantage Dental, Capitol Dental and Care Oregon in multiple clinics.

Capitol Dental has even cancelled two existing contracts with two of our clinics recently. I am aware that this has happened to multiple private practice providers in the Willamette Valley, Central and Southern Oregon. The fastest, easiest, and most effective way to increase access to care is to hold the insurance companies accountable for opening up and maintaining relationships with current providers who wish to treat more patients on Medicaid.

2. This bill opens up the potential for non-dentists to perform procedures that even professionally trained dentists are typically not comfortable doing due to the complexity of the procedure. One of the values listed in the Hippocratic Oath acknowledged and sworn to by most medical providers is non-maleficence ("do no harm"). The scope outlined in this bill goes very far beyond the current National Accredited CODA scope and puts patients at risk of harm by their provider.

3. There is no evidence among other states with Dental Therapists that supports the purpose of Dental Therapists increasing access to care for individuals on Medicaid. If we introduce this role in Oregon, we need to see evidence to support the intent.

Please do not move this bill out of committee without substantial revisions to ensure patient safety. The dental community invites open and honest discussion regarding long-term solutions to increase access to care, primarily holding the insurance companies accountable to utilize current opportunities to do so with no change to current regulations.

Sincerely,  
Dr. Tim Richardson  
Silverton, Oregon