

May 9, 2021
Senate Committee on Health Care
900 Court Street NE
Salem, Oregon, 97301
RE: Concerns regarding HB2528

Dear Members of the Senate Health Care Committee,

My name is Allen Cheng DDS, MD, FACS. I am an oral and maxillofacial surgeon who has been practicing in Portland for the last 9 years. I am writing to express my concerns regarding the Dental Therapy Bill, House Bill 2528. I can understand the motivation to provide greater access to care to historically underserved communities. However, this bill, as written, does not sufficiently protect the public which it intends to serve.

First, all dental professionals (dentists, specialists, dental hygienists) receive their education at programs accredited by CODA (Commission on Dental Accreditation). CODA is recognized by the US Department of Education as the sole agency for accrediting dental programs in the United States. This ensures that any educational program must meet accepted standards and requirements for training future dental professionals. If dental therapists are to be providers of dental care, it is absolutely essential that any training program is subject to these same standards. Anything less would essentially be condoning sub-standard treatment for underserved communities.

Second, I, along with every oral and maxillofacial surgeon in the state, are extremely concerned with allowing dental therapists to perform dental extractions on "loose" permanent and primary teeth under "indirect" supervision. The language and definition of "loose" is vague and at risk for liberal interpretation. As an oral and maxillofacial surgeon, I have received 16 years beyond a high school education. As mentioned, I have practiced now for 9 years. I am faculty at Oregon Health Sciences University. I operate in both the outpatient and inpatient settings and cover call at our region's busiest Level I Trauma Center. I have extracted tens of thousands of teeth. Even now, I am occasionally surprised by the unexpected difficulty with dental extractions. As a physician, I still recognize that dental extractions are a surgical procedure that puts a patient at substantial risk if a proper preoperative evaluation is not performed or a postoperative management plan is not in place. As an on-call surgeon at Legacy Emanuel Medical Center, I regularly manage severe, potentially life-threatening complications related to dental extractions or dental infections. Therefore, including dental extractions in the repertoire of dental therapists who receive minimal training and no medical education is inappropriate. Allowing them to do so with indirect supervision is simply reckless and irresponsible.

I implore the members to now allow this bill to move out of the committee. For the safety of the community, it really needs to be reworked. The proponents of the bill really need to make a good faith effort to engage and address the many concerns of the majority of the dental community before this can be viewed as a safe measure to address the dental health needs of Oregon citizens.

I appreciate your taking the time to hear out my concerns.

Sincerely,
Allen Cheng DDS, MD, FACS
Portland, Oregon