

## Opposition to House Bill 2996

Dear Chair Nosse and Members of the House Committee on Behavioral Health and Health Care,

My name is Jill Lomax and I am a dental assisting educator and currently serve on the Oregon Dental Assistant's Association's Executive Board representing 5500+ dental assistants in the state of Oregon.

As dental assisting instructors, we emphasize safety in everything we teach.

I am speaking to you today in opposition to House Bill 2996 that if passed would prohibit the Oregon Board of Dentistry from requiring "a written examination for radiological proficiency" for dental assistants.

To clarify, the Oregon Board of Dentistry does not require "a written examination for radiology proficiency" as stated in the bill. It requires a written exam for Radiation Health and Safety (RHS). The proficiency (or clinical) part of the certificate is verified by a dentist, dental therapist, or dental hygienist in an office.

*So what is the Radiation Health and Safety Exam?*

It is an 80-question, multiple choice test used "to **ensure that individuals meet the *minimum national standard*** for knowledge-based competence in radiation health and safety tasks, critical to the health and safety of patients and dental healthcare personnel".

Individuals are tested on topics including:

- technique
- error correction to avoid taking more x-rays than needed
- short and long term effects of x-radiation on cells and tissues
- causes of unnecessary exposure to x-radiation
- patient x-radiation concerns
- radiation safety
- and patient protection

Dental assistants need to know these topics to keep the public and dental team members safe.

Candidates have the option to take the RHS exam in person or through online proctoring from home or anywhere in the state making the exam convenient and accessible. The exam is \$270 and the content is current, validated, and updated on a regular basis. Oregon has a higher pass rate than the national average (82% pass rate within one or two attempts) of this exam which proves that it is not a barrier to become a dental assistant.

Understandably, this bill is an effort to support dentists who are experiencing staffing shortages. The American Dental Association's Health Policy Institute, et al., conducted an

extensive study in 2022 and identified the strategies for shoring up the workforce. In addition, DANB hosted a summit in 2022 and identified cross-organizational initiatives that could be undertaken to assure that our future workforce needs are met. While one might think that reducing exams might increase the workforce, **neither study recommended eliminating exams**. Instead, some of the initiatives were to encourage standardizing education requirements and *enhance* training and competency standards.

The mission of the Oregon Board of Dentistry is “to promote quality oral health care and protect all communities in the State of Oregon by equitably and ethically regulating dental professionals.” The Oregon Board of Dentistry has adopted administrative rules that regulate dental assistants in Oregon through a formal rulemaking process that includes public hearings.

During this process in November, the Licensing, Standards, and Competency committee comprised of dentists, dental therapists, dental hygienists, and dental assistants reviewed a proposal to remove the radiation health and safety exam. **I would like to point out that this committee of dental professionals decided not to vote to move this proposal forward. Thus, this bill undermines the expertise and decision-making authority of the Oregon Board of Dentistry.**

In closing, I strongly urge you to vote No on House Bill 2996 as the radiation health and safety exam ensure that individuals meet the *minimum* national standard in knowledge in radiation health and safety. In addition, it prohibits professional requirements for dental assistants **without input from most of the dental community** and it hinders the dental profession from making decisions about dental assistant qualifications that are in the best interest of the public.

Thank you for your time and consideration.

Respectfully,  
Jill Lomax, EdM, CDA, EFDA-RF  
Dental Assisting Instructor  
ODAA Secretary

**Sources:**

Dental Workforce Shortages: Data to Navigate Today’s Labor Market (2022)  
[https://www.ada.org/-/media/project/ada-organization/ada/ada-org/files/resources/research/hpi/dental\\_workforce\\_shortages\\_labor\\_market.pdf](https://www.ada.org/-/media/project/ada-organization/ada/ada-org/files/resources/research/hpi/dental_workforce_shortages_labor_market.pdf)

Dental Assistant Future Workforce Stakeholder Forum Summit Report (2022)  
[https://danbsfprodassets.azureedge.net/assets/docs/default-source/email-assets-to-share/stakeholder-forum-summary.pdf?sfvrsn=c9af10d1\\_1](https://danbsfprodassets.azureedge.net/assets/docs/default-source/email-assets-to-share/stakeholder-forum-summary.pdf?sfvrsn=c9af10d1_1)