

February 15, 2023

Dear Chair Nosse, Vice-Chair Goodwin, Vice-Chair Nelson, and members of the House Behavioral Health and Health Care Committee:

I am writing to express my concerns about HB 2966, which removes the Board of Dentistry's authority to require a written exam for dental assistants who perform dental radiography in Oregon. **I strongly urge members of this committee to oppose HB 2996.**

I am a dentist with extensive training in the field of oral and maxillofacial radiology. After receiving a Master of Science degree in Dentistry and a Ph.D. degree in Oral and Maxillofacial Radiology in Brazil, I moved to the United States to complete a 3-year residency program in Oral and Maxillofacial Radiology at the University of Iowa. Since then, I have worked in dental education, research, and organizations in the field of oral radiology. I joined the Oregon Health and Science University (OHSU) School of Dentistry in January 2019 to serve as the director of the Oral Radiology Clinic and course director of the radiology curricula to the predoc and graduate programs. I am a diplomate of the American Board of Oral and Maxillofacial Radiology (ABOMR). As an internationally recognized expert in the field, I was elected as councilor for Public Policy and Scientific Affairs at the American Academy of Oral and Maxillofacial Radiology (AAOMR) and regional director for North America at the International Association of Dentomaxillofacial Radiology (IADMFR). Despite my institutional affiliation with these organizations, this letter **does not** represent their official opinion on HB 2996, but my personal point of view.

Every radiographic procedure performed on a patient contributes to that patient's lifetime cumulative exposure to radiation. Research has shown that greater radiation exposure may correlate with a greater risk for negative health consequences, including cancer. The same is true for health care personnel who perform radiographic procedures and inadvertently expose themselves to radiation. With that in mind, the professionals in oral radiology strive to ensure that radiation exposure is as low as reasonably achievable. Removing exams that measure the acquisition and retention of knowledge, as the current bill proposes, is not consistent with that aim.

Currently, to perform radiography (in other words, to expose patients to radiation) in Oregon, a dental assistant must complete an educational course in radiology approved by the Oregon Board of Dentistry, pass a standardized Radiation Health and Safety (RHS) examination, and submit a form signed by a dentist or dental hygienist attesting to the dental assistant's proficiency. The required course of instruction may be provided in an office setting by the candidate's supervising dentist or another qualified team member if that person is approved by the Board of Dentistry to provide the instruction. When the instruction and attestation are provided by the candidate's employer or coworker, the RHS exam is the only element in the requirements that provides an objective, third-party verification that the candidate has the minimum knowledge required to perform radiography duties correctly and safely. **A high-quality, objective exam is a critical step in ensuring patient and provider safety.**

The RHS aligns with my expectations for what such an exam should cover; however, putting aside the suitability of any specific exam, I find it difficult to understand why the Oregon Legislature would seek to limit the ability of the Board of Dentistry to ensure the competency of those who expose patients to ionizing radiation. Standardized exams are an important part in measuring the acquisition and retention of knowledge in all areas of health care and many other professions, and it is counter to best practice and common sense to categorically prohibit their use in a profession where there are legitimate and well-documented safety risks.

Thank you for the opportunity to share my concerns as you consider HB 2996.

Sincerely,



Saulo L. Sousa Melo

Dentist, Associate Professor

Board-certified Oral and Maxillofacial Radiologist