



**OREGON  
DENTAL ASSISTANTS  
ASSOCIATION**

2/14/2023

Dear Representative Rob Nosse, chair, and members of the House Committee on Behavioral Health and Health Care,

My name is Bonnie Marshall and I represent the Oregon Dental Assistants Association.

I am writing this letter today in rebuttal to the testimonies that occurred yesterday regarding HB 2996 and HB 3223.

“The Oregon Board of Dentistry, ORS 679.230, consist of 10 members appointed by the Governor and subject by confirmation by the Senate in the manner provided in ORS 171.562.”

- (a) “Six must be Oregon active licensed dentists...”
- (b) “Two must be Oregon active licensed dental hygienists, and...”
- (c) “Two must be members of the public who are not...”

I would like this committee to consider and ask why either of these bills were placed before this house for consideration when the state has a mechanism in place for writing and changing all rules for Dentists, hygienists and dental assistants already in place. Do we not trust the individuals appointed by the Governor to make decisions regarding dentistry? If that is true maybe this committee should consider asking the Governor to make changes to ORS 679.230.

The Oregon Board of Dentistry is constantly reviewing and changing the rules set forth by the Practice Act in the Statutes. Division 42 regulates Dental Assisting and provides committee members to consider changes by allowing public testimonies prior to making changes. The process is outlined in ORS 818-001-0000, a-i.

During the testimony yesterday it was said that there is a shortage of all health care workers. I do not know of any other health care workers who are asking this committee to lower rules in order to “open the doors” for more people to work in health care.

One of the dentists in his testimony stated that dental assistants only work under “direct or indirect supervision”. I would like to clarify that statement by having this committee refer to OR 818-04-0050, Taking of x-rays-Exposing of Radiographic Images

- (1) “A licensee may authorize the following persons to place films/sensors adjust equipment preparatory exposing films/sensors and expose the films and create images under “General Supervision”. That means that a dental assistant can take x-rays even when a dentist or hygienist is not in the building.

A dentist wants a dental assistant to perform tasks independently while he/she are working in other operatories. A dentist with a busy schedule cannot be in two places at the same time therefore he/she depends on the dental assistant to perform tasks independently and correctly doing no harm to patients. The rules and standards set forth by the Oregon Board of Dentistry and Division 42 protect the quality of patient care and provide dental treatment in a safe environment.

Regarding written exams:

Testimony given yesterday stated that only DANB can administer exams, however, OR 818-042-0050, (2) states: “and who has passed the written Dental Radiation Health and Safety Examination administered by the Dental Assisting National Board, or comparable exam administered by any other testing entity authorized by the board ....” I believe that means that other exams can be created and given by someone other than DANB and that the Oregon Board of Dentistry has the authority to make it happen. The Oregon Board of Dentistry has chosen to work with DANB updating exams by making sure the dental assistants in Oregon have every opportunity to be successful. These ideas have been established in the Oregon Board of Dentistry rules by licensed dentists and hygienists who the Governor has appointed.

Oregon Legislative committee members do not need to consider the changing of the rules because the Governor has given the responsibility to the Oregon Board of Dentistry. The Oregon Board of Dentistry is doing a good job by making changes when needed while keeping the OBD mission statement regarding “quality of care” in the forefront of their decisions.

I respectfully ask this committee to consider NOT moving HB 2996 and HB 3223 forward and ask that this Legislative committee to defer rule changes to the Oregon Board of Dentistry and ask them to continue to do their job as requested by the Governor.

Respectfully,  
Bonnie Marshall

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