

Dear Chair Patterson and members of the Senate Health Care Committee,

I ask you to please Oppose House bill 2996 which “Prohibits the Oregon Board of Dentistry from requiring applicants for certification as dental assistant to pass written examination for radiological proficiency”. This means the Oregon Board of Dentistry (OBD) will no longer be able to require dental assisting applicants to pass the Radiation Health and Safety (RHS) board exam that covers how to expose dental x-rays safely for themselves and the public. The risk to the patient and the less knowledgeable dental assistant will be increased. In this week’s hearing, Rep. Javadi stated that all a dental assistant needs to do is “place a piece of plastic or sensor in the mouth” and “push a button”. His point being that he does not believe the Radiologic Health and Safety written exam provide an advantage to the dental assistant. I disagree. My main concern is that a dentist who believes taking an x-ray is as simple as placing a piece of plastic in the mouth, positioning it and pushing a button will teach their assistants this same disregard and flippancy for exposing diagnostic x-rays. Taking a diagnostic x-rays is a skill that takes months of practice and a higher degree of knowledge for safety protocols than Rep. Javadi seems to be aware of. That lack of knowledge will be perpetuated in the dental assistants who are trained by this individual and others with a similar viewpoint. As a dental assistant since 1988 and now a dental assisting instructor, I have never had a dentist oversee myself or any other dental assistants while they were taking xrays. This is not a good use of a dentist time or skill. Yet this Bill is written as though the dentists will be overseeing their dental assistants as they learn how to take x-rays. I believe that other similarly trained dental assistants will be teaching the skill and dental assistants who have never had to pass a Radiologic Health and Safety Exam will teach only to the level they have learned. This will run the risk of lowered standards, safety protocols and knowledge over time.

“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.” One of the ways the board does this is by “testing the competency of applicants through written and clinical examinations.”

This bill, if passed, will remove the current requirement that dental assistants demonstrate knowledge of safety when exposing patients to ionizing radiation by passing the Radiation Health and SAFETY exam. This is a national examination through the Dental Assisting National Board (DANB) that covers how to achieve diagnostic images to avoid retakes and ways to protect themselves and patients from unnecessary radiation. It also covers infection control within this process.

Ionizing radiation is a necessary diagnostic tool. However, it is cumulative. It builds in the body over time and is linked to cell damage, including DNA, and cancer. Yes, through digital radiography we have been able to reduce the levels of radiation exposed, and this is what we should strive to do – provide more and more protection for healthcare professionals and the public. We should NOT work on one hand to safeguard them, and with the other hand carelessly remove the oversight that ensures their protection. I have heard it expressed that dental radiographs provide no more radiation than an airplane ride. Perhaps, if done correctly, so as to avoid a bunch of retakes. That is for the patient. What about the dental assistant that exposes the radiation multiple times a day, day after day, week after week, year after year? How do we know that they understand the ways to not only protect their patients through safe and accurate techniques, but also how to protect themselves?

They demonstrate this knowledge by passing the Radiation HEALTH and SAFETY exam. We allow the Oregon Board of Dentistry to do their job “equitably and ethically regulating dental professionals.” (This is exactly what they did in November 2022 when they decided NOT to move this proposal forward when it was presented to them). They protected the standards of knowledge and care of professionals providing dental treatment in Oregon.

The testimony presented by Drs. Pham and Javity suggested that the dentists are overseeing the services (including taking radiographs) that are provided by their dental assistants. In reality, the dentists are rarely present when radiographs are being exposed. With the current shortage of dental assistants, this often leaves the assistant who is being trained (and has been shown how to) taking radiographs alone to expose the images.

The exam that this measure would remove ensures the dental assistant is aware of the anatomy that needs to be present for the images to be diagnostic, the adjustments that need to be made should a retake be necessary (to avoid a trial and error approach, exposing radiation each time), and the way to complete the process without cross contamination. The exam is in place to provide a calibrated standard of care for all dental patients in Oregon, no matter the office or school they received their training in.

Dr. Pham has stated multiple times that the pass rate of the RHS exam is only 68%. This percentage is the national average and is not true for the state of Oregon. In fact, previous testimony from the Dental Assisting National Board was that Oregon has one of the highest pass rates in the country, over 82%. (Dr. Pham is aware of this, as he was present the multiple times this information was provided). I suggest that even this rate would be higher if more exam applicants were trained sufficiently. As the instructor of dental radiology for almost 20 years at Lane Community College, our students’ pass rate of the RHS exam – on the first attempt – is almost 100% every year. Rarely does one of our students not pass this exam on the first attempt, including this year when they all just successfully completed their Boards.

While I am aware that not everyone can afford or access a college dental assisting program, DANB and the DALE Foundation, as well as Portland Community College, provide online courses on this content for a minimal cost (currently \$130 from DALE). The exam is \$270.00. Presently, it is not uncommon to see dental offices offering large sign-on bonuses to entice people to apply for dental assisting positions. If cost of the course and exam is a barrier to people wanting to join the dental field as professionals, doesn’t it make more sense for the dentists to invest in the professionalism and training of their new hires by covering these expenses? This approach maintains the standard of care to patients and protects the current level of professional expertise expected of professional dental assistants.

Removing the exam will not entice potential dental assistants to the field. Instead, it will lower the standard of care, reduce the safety for the patients, and marginalize the very field of applicants it is hoping to attract.

As a dental assistant of more than 35 years, and a dental assisting educator for nearly 20 years, I strongly oppose HB 2996 that prohibits the Oregon Dental Board from requiring assistants to take the Radiation Health and Safety Exam.

For the safety of all Oregonians, please do not pass HB 2996!

Respectfully,
Kym Peterson