



Dental Assisting National Board

Chair Patterson, Vice-Chair Hayden, and members of this committee. For the record, my name is Katherine Landsberg, and I am the Director of Government Relations with the Dental Assisting National Board (DANB). Thank you for the opportunity to testify on HB 2996.

This written testimony contains supplemental information that, in the interest of time, I omitted from my oral testimony.

DANB is the national American Dental Association-recognized certification board for dental assistants. DANB is known nationally and in Oregon as an expert in developing and administering high-quality knowledge-based assessments for dental assistants, as a trusted partner to state regulators in helping them meet their public protection objectives, and as a provider of information, resources, and data to those studying the dental assisting profession. Currently, 37 states and D.C. require or recognize DANB exams and certifications for dental assistants to qualify to perform specified duties.

About the RHS Exam

Successful performance on DANB's national Radiation Health and Safety (RHS®) exam is currently required by Oregon rules to earn the Oregon Radiologic Proficiency Certificate, which authorizes a dental assistant to perform radiography procedures in Oregon. DANB's RHS exam fulfills the exam requirement that is the subject of HB 2996.

The RHS exam is developed and administered in accordance with nationally and internationally recognized best practices and provides a valid and reliable measure of competence. DANB's Certified Dental Assistant (CDA™) certification, of which the RHS exam is one component, is accredited by the National Commission for Certifying Agencies.

RHS exam content is current and relevant. DANB exams, including the RHS exam, are developed by the dental profession—they are products of the collective experience and knowledge of subject matter experts, including both dental assistants and dentists and both clinicians and educators, working under the direction of DANB's psychometric staff, led by a Ph.D.-level psychometrician. The content of DANB exams is based on validation studies, performed on a regular schedule to ensure the content of each exam continues to reflect work performed and knowledge required in actual practice.

Oregon candidates' RHS exam pass rate is high. Oregon candidates consistently pass the RHS exam at a higher rate than the national average. For the period from January 2019 through October 2022, the percentage of Oregon candidates who passed the exam on the first or second attempt was 82%.

Exams are accessible and available remotely. Candidates may take DANB's RHS exam at any one of more than 250 computerized testing sites nationwide (including six locations in Oregon) six days per week during regular business hours. As of January 2021, candidates may also take the exam at home or another remote location of their choice through online remote proctoring, with appointments available 24 hours a day, seven days a week.

While I am happy to provide information about DANB's RHS exam, I don't think the conversation should focus solely on our exam, because this bill takes away the dental board's authority to require any written exam for radiography.

This bill ties the hands of the Board of Dentistry and makes it difficult for the Board to carry out its public protection mission, because high-quality, objective exams are the most common tool used by regulators to verify acquisition of knowledge in a way that is legally defensible. This bill removes objective standards and expects the dental board to issue a certification to a dental assistant based on one dentist's opinion about whether the person is qualified to expose patients to ionizing radiation and to protect themselves from that radiation. That is simply not a valid or legally defensible basis for certification.

Proponents of this bill have spoken dismissively about multiple-choice tests without advancing any argument for why such tests are not suitable. In fact, multiple choice tests are used and valued by the State of Oregon in the credentialing of dentists, dental hygienists, many health professions, and many allied health professions outside of dentistry, including emergency medical technicians, lactation consultants, pharmacy technicians, physical therapist assistants, and respiratory therapists, to name only a few.

The testimony of proponents has also largely ignored the issue of occupational safety. Oregon Board of Dentistry and Oregon Health Authority regulations are intended to protect not only patients but also operators from unsafe exposure to radiation. If on-the-job trained dental assistants have not received the correct information from their trainers about how to protect themselves, they could be routinely making errors that put their own health at risk.

I'd also like to address the idea that removing the x-ray exam requirement will counteract the dental assisting shortage. It won't.

Even states that have no exam requirements for dental assistants are experiencing a shortage. You may note the written testimony of a dental assisting educator in Nevada who indicated that, although the state has no specific requirements for dental assistants, they still have a shortage. Why? A big reason is turnover – people who enter the profession and don't receive appropriate training, don't feel they are good at their own jobs, are not valued and respected as credentialed members of the dental team, and don't have a roadmap for advancement do not stay in the field. They leave in droves. And there is no pipeline of qualified candidates to replace them. What's more, removing the assessment component of the certification devalues the certification and may lead to wage compression, which will hinder both recruitment of new dental assistants and retention of those already practicing.

Solving the shortage will require investing in the education of the future workforce and establishing dental assisting as an attractive profession where people are compensated well, treated with respect, and have opportunities for growth.

DANB's Board of Directors has just approved a future-focused strategic plan that calls for us to take a 360-degree view of our programs and to engage stakeholders in a process of finding the best ways to protect the public while supporting the careers of dental assistants, the dental practices that employ them and the regulators who make sure they are doing their jobs safely. We are evaluating ways in which smaller, stackable credentials or micro-credentials might allow dental assistants to start earning credentials earlier in their careers and incrementally gain skills and knowledge as they progress. We will also soon be seeking input from stakeholders into the development of recommendations for a more uniform professional model for dental assisting, and we hope to have dental assistants and dentist from Oregon join that conversation.

While we get those efforts underway, we are moving forward immediately on the following initiatives to help expedite the entry of new dental assistants into the field:

- We are developing a Spanish translation of the RHS exam and are targeting the beginning of 2024 for completion and launch; the RHS exam will be the first credentialing exam in the dental field offered in Spanish
- As I already mentioned, we offer our exams through online remote proctoring, so more people can take our exams from more locations, while still maintaining exam security
- We've identified opportunities in our application processes to remove some documentation hurdles that may hinder or deter individuals from applying

This bill does not make the public or dental assistants safer and will not solve the dental assisting workforce shortage, but may make it worse. I urge you vote no on this proposal and to work together with stakeholders in Oregon to find a better way forward.

Thank you once again for your time, attention, and consideration. I am happy to answer any questions.