



February 19, 2025

Dear Chair Nosse and Members of the House Committee On Behavioral Health and Health Care:

The Oregon Association of Dental Laboratories urges your support for HB 2594. HB 2594 requires dental laboratories to provide the prescribing dentist with material content and point of origin disclosures for each restoration made, to register with the Health Licensing Office and to employ at least one technician who meets certain educational requirements. A lab is exempt from registration if it is either part of an educational program or if it is in-house to a dental office and serving their patients.

In Oregon today, dental labs are not legally required to provide any disclosures to dentists unless those disclosures are specifically requested. Even if requested by the dentist, a lab is only required to specify where a completed restoration was manufactured, but not what it is made out of or where particular components were manufactured.

OADL supports the greater transparency provided by disclosure and registration requirements for dental laboratories as set forth in HB 2594, because these protect patients. Added accountability, through registration and disclosure, helps assure that every dental laboratory providing restorations to an Oregon dentist also provides the dentist with the accurate, detailed material content and point of origin disclosure information that the dentist needs to continue providing the highest standard of care for their patients.

As the market for restoration products is becoming more and more complex, it is increasingly important for states to require the accountability necessary to provide these basic consumer safeguards.

The registration program in HB 2594 is intended to be self-supporting through registration fees, which has been the experience in other states that have adopted dental lab registration laws. We acknowledge that costs are always a consideration, particularly given the entire dental industry's shared goal to enhance access for our most vulnerable populations. According to fee data gathered through a National Association of Dental Laboratories (NADL) 2022 market survey, the average fee for all crown types in the states that have adopted registration requirements (FL, KY, MN, OK, PA, SC, TX, WA) is below the national average fee for crowns. We do not anticipate laboratory registration requirements to have an effect on costs.

The dental laboratory provisions of HB 2594 will enhance patient safety and consumer safeguards, and we urge your support.

Sincerely,
Carrie Peil
Executive Director