

October 10, 2024

Stephen Prisby, Executive Director Oregon Board of Dentistry 1500 SW 1st Avenue, Suite 770 Portland, OR 97201-5837

Dear Mr. Prisby,

The Oregon Dental Hygienists' Association (ODHA) supports proposed rule 818-042-0096 that would allow EFDA certified dental assistants, who have successfully completed a Board approved course and obtained a local anesthesia certificate, to administer local anesthetics and local anesthetic reversal agents under the indirect supervision of a dentist.

This proposed rule has been discussed by the Oregon Board of Dentistry since August 2022 and it has been discussed by three of the Board's standing committees. There are two dental hygienists on the Board and there is one ODHA representative on each of these standing committees. These dental hygienists have had an opportunity to actively participate in the discussions about this proposed rule over the last two years.

The proposed rule is the same as the local anesthesia rule for dental hygienists except for the name of the credential and the level of supervision required. The Board approved course will be comparable to the course that is currently offered for out-of-state dental hygienists who are applying for a local anesthesia endorsement in Oregon.

The ODHA is confident that dental assistants who have a local anesthesia certificate issued by the Board can safely administer local anesthetic agents and local anesthetic reversal agents under indirect supervision which requires the dentist to authorize the procedure and to be on the premises when the procedure is performed. Dentists routinely have their dental assistants perform a variety of procedures that require a high level of knowledge & skills. Allowing dentists to delegate this procedure to a dental assistant can make restorative care more efficient for the dentist and more comfortable for the patient.

Thank you for your considering our comments.

Sincerely,

Hisa J Rowley

Lisa J. Rowley Advocacy Director Oregon Dental Hygienists' Association