

NEVADA STATE BOARD  
of  
DENTAL EXAMINERS



LEGISLATIVE, LEGAL & DENTAL  
PRACTICE COMMITTEE MEETING

OCTOBER 5, 2020

6:00 P.M.

**PUBLIC COMMENT BOOK**

**Public Comment from:**

**Nevada Academy of General Dentistry**

**- Dr. Emily Ishkanian Neal, DMD**

**- Dr. Steven Saxe, DMD**

**- Dr. Sulabh Shroff, DMD**



NEVADA STATE SOCIETY OF ORAL  
and  
MAXILLOFACIAL SURGEONS



September 30, 2020

The Nevada Board of Dental Examiners  
6010 S Rainbow Blvd #1  
Las Vegas, NV 89118

**RE: Expanding Authorization for Dental Professionals to Order and Administer COVID-19 Vaccinations**

Dear the Nevada State Board of Dental Examiners:

The Nevada Academy of General Dentistry applauds your proactive efforts to review regulatory changes that would permit licensed dentists the option to administer vaccinations.

As you know, dental professionals are critical primary health care professionals who serve on Nevada's frontlines. These highly trained medical professionals have both the experience and expertise to help with the pandemic response efforts. Licensed dental professionals, such as dentists (D.D.S./D.M.D.) and hygienists (R.D.H.), are trained in human anatomy, physiology, and pathophysiology as well as in administering intra-oral local anesthesia. It is arguably technically more difficult to administer an inferior alveolar nerve block inside the oral cavity than to administer a subcutaneous or intramuscular vaccine to an exposed arm.

Some states are already beginning to expand the scope of practice for dental professionals. Last year, Oregon passed a law allowing dentists to prescribe and administer vaccinations, joining Minnesota and Illinois, where dentists—under a more limited scope—can administer the seasonal influenza vaccine to adults. Furthermore, according to the American Association of Dental Boards, at least half of U.S. states are already considering using oral health professionals in the administration of the COVID-19 vaccine when it becomes available.<sup>1</sup>

During these unprecedented times, we support the Board in making every effort to reduce barriers associated with immunization disparity in our state. With factors including lack of access and insurance, public distrust in science, and concerns about vaccine side-effects and safety affecting vaccination rates, we must do everything we can to ensure those wishing to get a COVID-19 vaccine can do so once they are available. Utilizing dental professionals can increase accessibility to the vaccine, particularly in rural areas where people may not have access to clinics or drug stores.

<sup>1</sup> USPHS Chief Dental Officer Newsletter #51: August 18, 2020. [https://www.henryschein.com/us-en/images/dental/USPHS-Chief-Dental-Officer-Newsletter-Issue-51-August-18\\_2020.pdf](https://www.henryschein.com/us-en/images/dental/USPHS-Chief-Dental-Officer-Newsletter-Issue-51-August-18_2020.pdf)



NEVADA STATE SOCIETY OF ORAL  
and  
MAXILLOFACIAL SURGEONS



As you and your colleagues work to review the dental health professional's participation in the COVID-19 vaccination strategy, we implore you to expand the scope of practice for dental professionals to administer vaccines in order to aid in outbreak prevention and control.

Thank you for considering our request and for your continued leadership in response to the COVID-19 crisis.

Sincerely,

Emily Ishkanian Neal DMD  
Nevada Academy of General Dentistry, President

Steven Saxe DMD  
Nevada State Society of Oral and Maxillofacial Surgeons

Sulabh Shroff, DMD  
Nevada Academy of Pediatric Dentistry, President

**Public Comment from:**

**Nevada Dental Hygienists' Association  
- Lancette VanGuilder, RDH, BS**



October 2, 2020

The Nevada State Board of Dental Examiners

Legislative, Legal and Dental Practice Committee Meeting- October 5, 2020

Agenda Item 4(b)

**The NDHA fully supports the administration of vaccinations by all licensed dental practitioners.**

This is a prime time for the Nevada State Board of Dental Examiners to demonstrate leadership. Approving language that is inclusive of all licensed dental practitioners and addresses overall health exudes confidence in the dental workforce, the importance of public health policy and a transformative dental board committed to public health and safety.

Please take this opportunity be progressive by utilizing the skills of our licensed dental workforce, which will demonstrate to the public the vital role that the dental industry can play in the evolving healthcare landscape. We are safe, effective, educated, licensed and ready to serve our communities, especially during unprecedented times such as these, where efforts are so vitally needed.

Terminology:

Using the term *all licensed dental practitioners* encompasses the entire preventive, therapeutic and restorative dental workforce in Nevada and all licensees that the dental board represents. In Nevada, dental hygienists, dental therapists and dentists all must graduate from a CODA accredited program, pass board examinations and obtain/maintain professional licensure. All of these professions have a strong educational background in anatomy and physiology, pharmacology and medical emergencies- just to name a few.

Justification: Dental hygienists and dental therapists are a ready-made workforce to improve public health and we have support from the dental hygiene community in Nevada.

**2018:** The NDHA started discussing the role that dental hygienists may play in the administration of vaccinations several years ago. In 2018, the NDHA House of Delegates passed initial language to set the stage for innovative and collaborative public health opportunities.

*The NDHA supports interprofessional advocacy of public and social policies that promote health.*

**2019:** In September of 2019, the NDHA met with Immunize Nevada and the Nevada Department of Health and Human Services (NDHHS) State Immunization Program to discuss the role of dental hygienists in public health efforts, such as vaccinations, and received great feedback and support. At that time, we had discussed flu vaccinations, those required for school entrance and the HPV vaccination. Now, we can add COVID-19 to the list of critical vaccinations to improve public health outcomes. The NDHA House of Delegates passed this resolution in 2019 and it was added to the legislative agenda of the NDHA:

*The NDHA supports the promotion, use and administration of vaccinations for disease prevention in the dental office by dental hygienists.*

**2020:** The NDHA conducted a survey of dental hygienists earlier this year (members and non-members) on various topics, including vaccinations. We did not receive any negative feedback regarding the vaccine administration from respondents.

*The majority of dental hygienists supported the administration of vaccinations by licensed dental hygienists, with continuing education provided.*

The NDHA also provided language to the Nevada NPBH Oral Health Division in support of dental hygienists/dental therapists being included in vaccine administration and requested that the dental hygiene/ dental therapy workforce be included in all oral health initiatives for the state of the Nevada. Dr. Capurro has been a champion to help improve the overall health and safety in our communities. Over the last year, we have worked with her on numerous items and appreciate the work that she is doing to improve access to care for Nevadans and hope to continue to support collaborative and innovative healthcare solutions.

It is also important to note that in primary care settings, a medical doctor is typically not the person administering vaccinations, it is the nurse, nurse practitioner or physician's assistant. The multi-tiered cost-effective and safe medical workforce is a prime example of helping as many people as possible through education, access and licensure. The Governor of Nevada and the Board of Pharmacy recently determined that more outreach is needed for vaccinations, especially in preparation for the anticipated COVID-19 vaccine and approved Pharmacy Technicians for vaccine administration. All licensed dental practitioners in Nevada have significantly more college education, licensure requirements and accountability than pharmacy technicians and seem to be at least as, if not more, qualified to administer vaccinations, with proper education and training. The Center for Disease Control and other entities have training modules and opportunities for healthcare providers to become trained on vaccine administration and none of them require attendees to be medical doctors.

Please take this testimony in to consideration as you deliberate on this very timely topic. We are available for questions or if you have a request for additional information.

Lancette VanGuilder, RDH, BS



Nevada Dental Hygienists' Association