

NEVADA STATE BOARD
of
DENTAL EXAMINERS



REGULATION WORKSHOP

WEDNESDAY, NOVEMBER 10, 2021

6:00 P.M.

PUBLIC COMMENT BOOK

Public Comment:

Caryn Solie, RDH

Public Comment submission to Nevada State Board of Dental Examiners 11/02/2021 Workshop

1. Public Book page 8, **Dental Therapists' eligibility to apply for license and educational requirements-** The Board's jurisdiction does not extend to mandating courses, subject matter and hours in the standards adopted by CODA for the educational programs for dentistry, dental therapy, and dental hygiene.
The NRS 631.312c1 clearly states the dental therapy education program must NOT be less than 2 years. Additionally, the Nevada statute requires the Dental Therapist applicant must hold a dental hygiene license. The board fully recognizes and accepts the dental and dental hygiene education of CODA educated graduates, as CODA approved education standards teach to competency and proficiency.
2. Public Book page 9- **Examination to practice dental therapy-** These are redundant additions as all components of the Dental Therapist's education and scope of practice are tested in the CDCA/WREB competency examinations. The Board continually monitors the content of examinations by participating in AADB, ADEX standards and serving as CDCA/WREB examiners.
3. Public Book page 10-**"Direct Supervision" defined for purposes of NRS 631.3122-** This requirement would best be placed into the area of the regulation that pertains to the supervision in completing the noted hours of 500/1000/1500 by the DT. The intent of the statute allows the Dental Therapist to practice under authorization by the dentist within the practice agreement, not direct supervision once those hours are completed and the Dental Therapist is certified by the board.
4. Public Book page 11- **Required provisions of dental therapy written practice agreement-** Line items 1 and 4 are best utilized with the language in statute. Line items 2 and 3 should be required for all dental practice locations, not just the Dental Therapist practice sites.
5. Public Book page 12- **Requirements of authorizing dentist supervising a dental therapist-** The language in NRS succinctly covers each of these points and would be best used in this regulation to fully meet the intent of the law.
6. Public Book page 13- **Notification to dental therapist if authorizing dentist is under board investigation-** NRS and NAC do not require a licensee under investigation to not practice unless a cease-and-desist order/license revocation is issued, therefore unless the DDS license is not valid the Dental Therapist should be able to continue patient care under the practice agreement.
7. Public Book pages 14 and 15- **Dental therapists: Authorization to perform certain services; referral of patient to authorizing dentist for certain purposes-** NRS 631.3124 and 631.3125 clearly state the full scope of practice that the Dental Therapist is educated and tested to provide, it does not require direct supervision by the authorizing DDS and regulations should include the care and services that statute indicates. This proposed regulation language does not meet the intent of the statute and is too restrictive to the authorizing DDS.

The public is protected and provided safe care with Dental Therapists who are educated, and competency tested just as Dentists and Dental Hygienists are, and therefore should not be restricted by regulations out of fear of a new entity being added to the oral healthcare team.

As the Board is discussing changes to NAC 631, I respectfully request the Board to consider moving NAC 631.210 section 3e to NAC 631.210 section 2, thus allowing licensed Dental Hygienist's to provide light activated bleaching under authorization of the Dentist.

Similarly, consider moving NAC 631.210 4 a and b to NAC 631.210 section 2, allowing Dental Hygienist's to administer local anesthesia/nitrous oxide under authorization of the Dentist as stated in NRS 631.311.

I ask the Board to consider adopting regulations that would register dental assistants with the Board, as NRS and NAC contain scope of practice for them, it makes sense that the Board should monitor dental assistants.

I would like to recommend that NAC 631.173 include that with each renewal licensees must retake the online jurisprudence test.

Hopefully, with licensees being more knowledgeable of the laws and regulations the number of complaints and concerns could be reduced, and greater safety for the public would be ensured.

Respectfully,
Caryn Solie, RDH