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Dental Pilot Project Program: Site Visit Report

The Dental Pilot Project Program allows authorized organizations to test, demonstrate and evaluate new or expanded roles for oral healthcare professionals before changes in licensing laws are made by the Oregon State Legislature. The intent of the project is to prove quality of care provided, trainee competency and patient safety in addition to the larger goals of access to care, cost effectiveness and the efficacy of introducing a new workforce model.

The Oregon Health Authority (OHA) is responsible for monitoring approved pilot projects and ascertaining the progress of each project in meeting its stated objectives and complying with program statutes and regulations. The primary role of OHA is monitoring for patient safety. Secondly, OHA shall evaluate approved projects and the evaluation shall include, but is not limited to, reviewing progress reports and conducting site visits.

Site visits are conducted with the primary purpose of health and safety monitoring and surveillance and to determine compliance with administrative rules. Site visits are conducted using both qualitative and quantitative methodological approaches. They primarily consist of participant interviews and clinical records review.

Project Name & ID Number:	Dental Pilot Project #100, "Oregon Tribes Dental Health Aide Therapist Pilot Project."
Project Sponsor:	Northwest Portland Area Indian Health Board (NPAIHB)
Date of Site Visit:	November 6, 2019
Site Location:	<p>Site: NARA- Native American Rehabilitation Association Location: NARA – Residential Youth 12360 E Burnside St, Portland, OR 97233</p> <p>https://www.naranorthwest.org/ https://www.naranorthwest.org/projects/nara-youth-residential-treatment-center/</p> <p>Please see Appendix A for more information on the site and location.</p>
Primary Contact Name and Title:	Christina Peters, Project Director

<p>Objectives of the Site Visit:</p> <ol style="list-style-type: none"> 1. Determination that adequate patient safeguards are being utilized. 2. Validation that the project is complying with the approved or amended application 3. Compliance with OARs 333-010-0700 – 333-010-0820. 	<p>Methodology:</p> <ol style="list-style-type: none"> 1. Interviews with project participants
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Attendees:

Name	Title	Organization
Azma Ahmed, DDS	Dental Director	NARA*
Rick Asai, DMD	General Dentist, Retired	Advisory Committee**
Bruce Austin, DMD	Statewide Dental Director	OHA***
Miranda Davis, DMD	Dental Director for DHAT Initiative	NPAIHB****
Kari Douglas, DHAT	Dental Health Aide Therapist (DHAT) Trainee	NARA
April Geisler	DHAT Coordinator	NARA
Paula Hendrix, EPDH, M.Ed.	Program Director, Dental Hygiene Program, Oregon Institute of Technology-Salem	Advisory Committee
Pam Johnson	Project Manager	NPAIHB
Fred King, MS, PhD	Research Analyst	OHA
Alistair Kok, DDS	Supervising Dentist	NARA
Sarah Kowalski, RDH, MS	Dental Pilot Project Program Coordinator	OHA
Allyson Lecatsas, MBA	Health Director	NARA
Patient - Name Redacted	Redacted	NARA Youth Residential*****
Nathan Perry, CADC	Certified Alcohol Drug Counselor	NARA
Christina Peters	Project Director	NPAIHB
Pam Johnson	Project Manager	NPAIHB
Michael Watkins	Chief Operations Officer	NARA
Gita Yitta, DMD	Dental Director, DPP#100	NPAIHB

*Oregon Health Authority (OHA)

** Advisory Committee Members, Oregon Health Authority Dental Pilot Project Advisory Committee

*** Native American Rehabilitation Association (NARA)

****Northwest Portland Area Indian Health Board (NPAIHB)

***** Individual is a patient at the NARA Youth Residential Inpatient Alcohol and Drug Treatment Program. Their name has been redacted to protect the privacy and identity of the individual.

Clinical Records Review: The purpose of a clinical records review is to allow Advisory Committee members and other subject-matter experts the opportunity to review and make assessments and determinations of the quality of care provided by the DHAT trainee within the constraints and limitations of a chart auditing review. Only charts of irreversible procedures are reviewed.

At the time of the site visit on November 6th 2019, the DHAT trainee had not completed any irreversible procedures. The DHAT trainee is currently under their preceptorship and completing procedures under the direct supervision of their supervising dentist. Previously, another DHAT trainee provided services at the NARA site. The previous DHAT trainee resigned from their position on October 10, 2018. No irreversible procedures have been performed by any DHAT trainees at the NARA site between the dates of October 10, 2018 to the date of the site visit on November 6, 2019. Due to a lack of data, there are no charts for the Advisory Committee and other subject-matter experts to review for this site visit.

The Authority is required to conduct, at a minimum, at least one site visit annually to one or more project offices, employment/utilizations sites, or other locations where trainees are being prepared or utilized. Site visits are required to include that the following components:

- A determination that adequate patient safeguards are being utilized.
- Validation that the project is complying with the approved or amended application.
- Interviews with project participants and recipients of care.
- Reviews of patient records to monitor for patient safety, quality of care, minimum standard of care and compliance with the approved or amended application.

As there were no charts to review, as required, OHA will conduct a second site visit in June 2020 under “Dental Pilot Project #100 “Oregon Tribes Dental Health Aide Therapist Pilot Project.”

Previous site visits that included a chart review component occurred on the following dates:

Date	Site Visit Location
February 26, 2018	Native American Rehabilitation Association (NARA) Dental Clinic 12750 S.E. Stark St. Building E, Portland, OR 97233
May 22, 2018	Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI) Dental Clinic 1245 Fulton, Coos Bay, OR 97420
September 20, 2018	Native American Rehabilitation Association (NARA) Residential Treatment Center 17645 NW St Helens Rd, Portland, OR 97231
May 2019	Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI) Dental Clinic 1245 Fulton, Coos Bay, OR 97420

Summary of Findings:

- There were no instances of patient harm that were revealed during the site visit. No instance of patient harm have been reported to the Oregon Health Authority.
- There were no adverse events reported to the Authority by the project sponsor as required under OAR 333-010-0760. (Appendix B)
- DHAT trainees are operating under their approved scope of practice.
- The project is in full compliance with their approved amended application.

333-010-0790 Dental Pilot Projects: Authority Responsibilities

Site Visits

(a) Site visits shall include, but are not limited to:

(A) Determination that adequate patient safeguards are being utilized;

(B) Validation that the project is complying with the approved or amended application;

(C) Interviews with project participants and recipients of care; and

(D) Reviews of patient records to monitor for patient safety and the applicable standard of care. (b)

If the Authority has convened an advisory committee, representatives of the committee may be invited by the Authority to participate in the site visit though the Authority may, at its discretion, limit the number of members who can participate;

(c) Written notification of the date, purpose and principal members of the site visit team shall be sent to the project director at least 90 calendar days prior to the date of the site visit;

(d) Plans to interview trainees, supervisors, and patients or to review patient records shall be made in advance through the project director;

(e) An unannounced site visit may be conducted by program staff if program staff have concerns about patient or trainee safety;

(f) The Authority will provide the project sponsor with at least 14 business days to submit to the Authority required patient records, data or other documents as required for the site visit;

Site Visit Reporting Process

(g) Following a site visit the Authority will:

(A) Within 60 calendar days, issue a written preliminary report to the sponsor of findings of the site visit, any deficiencies that were found, and provide the sponsor with the opportunity to submit a plan of corrective action;

Corrective Action Plan Process and Requirements

(i) A signed plan of correction must be received by the Authority within 30 calendar days from the date the preliminary report of findings was provided to the project sponsor;

(ii) The Authority shall determine if the written plan of correction is acceptable no later than 30 calendar days after receipt. If the plan of correction is not acceptable to the Authority, the Authority shall notify the project sponsor in writing and request that the plan of correction be modified and resubmitted no later than 10 business days from the date the letter of non-acceptance was mailed to the project sponsor;

(iii) The project sponsor shall correct all deficiencies within 30 calendar days from the date of correction provided by the Authority, unless an extension of time is requested from the Authority. A request for such an extension shall be submitted in writing and must accompany the plan of correction.

(iv) If the project sponsor does not come into compliance by the date of correction reflected on the approved plan of correction, the Authority may propose to suspend or terminate the project as defined under OAR 333-010-0820, Suspension or Termination of Project.

(B) Within 90 calendar days of receipt of a plan of correction, issue a final report to the sponsor;

Final Site Visit Report Process

(C) If there are no corrections needed, the Authority will issue a final report within 180 calendar days.

(4) The Authority may also provide the sponsor with the opportunity to submit a corrective action plan to address any deficiencies found by the Authority during any project monitoring as described in section (1) of this rule. The Authority shall notify the sponsor in writing of the requirement to submit a plan of correction. The sponsor must submit, and the Authority must receive the plan of correction by the deadline set in the notification. All of the requirements and deadlines described in section (3) of this rule for corrective action plans apply to a project sponsor when directed to submit a corrective action plan under this section (4).

Report of Findings

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (1) Provide for patient safety as follows: (a) Comply with informed consent in accordance with OAR 333-010-0770, Informed Consent;		ID Number MS1A
Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (1) Provide for patient safety as follows: (b) Prohibit a trainee from performing procedures the trainee is not capable of performing based on the trainee’s level of education, training and experience, physical or mental disability, or which are outside of the trainee’s approved scope of practice as outlined in the approved application by the Authority;		ID Number MS1B
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (1) Provide for patient safety as follows: (c) Provide or arrange for emergency treatment for a patient currently receiving treatment and needs emergency care;		ID Number MS1C
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified. There have been no instances of emergencies.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (1) Provide for patient safety as follows: (d) Not use the behavior management technique of Hand Over Mouth (HOM) or Hand Over Mouth Airway Restriction (HOMAR) on any patient;		MS1D
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (1) Provide for patient safety as follows: (e) Comply with ORS 419B.005 to 419B.010 related to the mandatory reporting of child abuse;		MS1E
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (1) Provide for patient safety as follows: (f) Comply with ORS 453.605 to 453.755 or rules adopted pursuant thereto relating to the use of X-ray machines;		MS1F
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (1) Provide for patient safety as follows:		

(g) (g) Comply with ORS 679.520 or rules adopted pursuant thereto relating to the treatment of dental waste materials;		MS1G
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified. Observation: Records kept and clinic is in compliance.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (1) Provide for patient safety as follows: (h) Comply with ORS 679.535 or rules adopted pursuant thereto relating to the requirement to test heat sterilization devices;		MS1H
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified. Observation: Clinic in compliance, records kept for testing of sterilization devices. Clinic completes a spore test on the first day of the work week. Indicator strips are always placed inside the cassettes and instrument bags. Infection control program in place. Annual review requires under NARA Dental Clinic policies and Indian Health Services (IHS) policies.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (1) Provide for patient safety as follows: (i) Ensure that project participants involved in direct patient care: (A) Have not been convicted of any crimes, within the last 10 years, that is a crime of violence or crime of dishonesty.		MS1IAB

(B) Have not been denied or disciplined by a state entity that issues licenses or certificates.		
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	<p>No deficiencies identified.</p> <p>Observation: Under Indian Child Welfare Act, annual background checks are required. Clinic and project are in compliance with OAR and Federal requirements.</p> <p>Indian Child Welfare Act. Indian Child Welfare Act, (Pub.L. 95-608, 92 Stat. 3069, enacted November 8, 1978, 25 U.S.C. §§ 1901-1963)</p>	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
<p>A dental pilot project shall:</p> <p>(1) Provide for patient safety as follows:</p> <p>(j) Ensure adequate supervision and evaluation of trainees, including but not limited to:</p> <p>(A) Timely review of trainee procedures and addressing any deficiencies;</p>		MS1JA
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	<p>No deficiencies identified.</p> <p>Observation: Every week, the supervising dentist will review all charts of irreversible procedures performed by the Ms. Douglas. At this time, Ms. Douglas has not completed any irreversible procedures under the preceptorship. All procedures completed under preceptorship require direct supervision of the supervising dentist.</p> <p>Detailed process outlined under DPP#100 Evaluation & Monitoring Plan.</p>	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards	ID Number
A dental pilot project shall:	

(1) Provide for patient safety as follows: (j) Ensure adequate supervision and evaluation of trainees, including but not limited to: (B) Monitoring for adverse events and addressing any deficiencies;		MS1JB
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified. Observations: See MS1JA. No adverse events were identified or reported.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (1) Provide for patient safety as follows: (j) Ensure adequate supervision and evaluation of trainees, including but not limited to: (C) Monitoring and evaluating trainees and addressing any deficiencies.		ID Number MS1JC
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified. Observations: See MS1JA.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (2) Ensure that participants in the project, including trainees, do not engage in unprofessional conduct as that is defined in ORS 676.150.		ID Number MS2
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (3) Ensure that an accurate patient record is prepared and maintained for each person receiving dental services, regardless of whether any fee is charged. The record shall contain the name of the trainee rendering the service and include, but is not limited to: (a) Name and address and, if a minor, name of guardian; (b) Date and description of examination and diagnosis; (c) An entry that informed consent has been obtained in accordance with OAR 333-010-0770, Informed Consent; (d) Date and description of treatment or services rendered; (e) Date and description of all radiographs, study models, and periodontal charting; (f) Health history; and (g) Date, name of, quantity of, and strength of all drugs dispensed, administered, or prescribed.		ID Number MS3
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	No deficiencies identified. Observations: NARA Dental Clinic utilizes informed consent paper forms. In future, the clinic will be incorporating forms into electronic format with paper copies available for patients who request a copy to keep for their own personal use. A chart review was not conducted for this site visit. The requirements are outlined in the Standard Operating Procedures Manual for the Dental Pilot Project. Clinic staff are required to review and complete training in the requirements of the pilot project which include administrative requirements as well as clinical requirements. The Standard Operating Procedures Manual is in full compliance with the approved/amended Dental Pilot Project application.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (4) Have a sufficient number and distribution of qualified clinical and non-clinical instructors to meet project objectives, as identified in the approved application.		ID Number MS4
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>

Observations and/or Identified Deficiencies:	No deficiencies identified. Observations: Ms. Kari Douglas is in the process of completing her preceptorship and is under direct supervision of Dr. Ahmed and Dr. Kok.
Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (5) Provide instruction to trainees following the training program outlined in the approved application by the Authority.		MS5
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and/or Identified Deficiencies:	<p>No deficiencies identified.</p> <p>Observations: The DHAT is expected to perform the procedures eight times when completing a preceptorship (unless otherwise noted on list), work independently each time, and in compliance with the established standards for review of each aspect of the procedure.</p> <p>If a procedure is deemed unacceptable, Dr. Ahmed will have a discussion with the DHAT trainee on why it was rated that way and what could be improved.</p> <p>Trainees participate in trainings.</p> <p>All pilot project requirements are outlined in the Standard Operating Procedures Manual for the Dental Pilot Project. Clinic staff are required to review and complete training in the requirements of the pilot project which include administrative requirements as well as clinical requirements. The Standard Operating Procedures Manual is in full compliance with the approved/amended Dental Pilot Project application.</p>	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards	ID Number
A dental pilot project shall:	MS6

(6) Assure that trainees achieve a minimal level of competence before they are permitted to enter the employment/utilization phase.		
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	<p>No deficiencies identified.</p> <p>Observations: Procedures that have been successfully demonstrated in accordance with Appendices B and D of the Pilot Project #100 Evaluation and Monitoring Plan can be added as they are completed, and performed under the supervision indicated in the practice plan during the preceptorship.</p> <p>In order to show maintenance of competencies, standing orders are reviewed and signed every two years by the DHAT and the supervising dentist.</p> <p>Kari Douglas, DHAT, is currently completing her preceptorship and is operating under direct supervision.</p>	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (6) (e) Trainee monitoring records shall be provided to the Authority.		MS6E
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	<p>No deficiencies identified.</p> <p>Observations: A chart review was not conducted for this site visit. Please see page 3 of this report for more information.</p> <p>Quarterly data reports are submitted to OHA that include trainee monitoring records. The project is in compliance with all data submission requirements.</p>	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (7) Comply with the requirements of the Dental Pilot Projects statute, Oregon Laws 2011, chapter 716; these rules [OARs]; and the approved application including, but not limited to, the evaluation and monitoring plan.		MS7
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>

Observations and Identified Deficiencies:	No deficiencies identified. Observations: The clinic and pilot project are in compliance with all aspects of the approved application and evaluation and monitoring plan.
Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (8) Evaluate quality of care, access, cost, workforce, and efficacy in accordance with the evaluation and monitoring plan approved by the Authority and as described in OAR 333-010-0780, Pilot Project Evaluation and Monitoring by Sponsor.		MS8
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	<p>No deficiencies identified.</p> <p>Observations: The project submits quarterly reports to demonstrate compliance with 333-010-0760.</p> <p>(10) Submit detailed quarterly monitoring reports in a format prescribed by the Authority that include but are not limited to the following information for the previous quarter:</p> <ul style="list-style-type: none"> (a) Accomplishments or highlights. (b) Challenges faced and continuous quality improvement activities. (c) Updated project timeline. (d) Data reports: <ul style="list-style-type: none"> (A) A comprehensive breakdown of each of the data points the project is capturing in its approved evaluation and monitoring plan including anonymized client level data. (B) Data generated by the clinical evaluator. (C) Number and type of any adverse event or complication that occurred during the reporting period. <p>Mekinak Consulting is an American Indian–owned business that specializes in the evaluation of programs serving Indigenous communities. Working in collaboration with the Northwest Portland Area Indian Health Board (NPAIHB), the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians (CTCLUSI), the Coquille Indian Tribe (CIT), and the Native American Rehabilitation Association (NARA). Mekinak Consulting developed the Evaluation Plan for 3 years of the 5-year pilot for the Tribal Dental Health Aide Therapist Project (TDHATP). The purpose of the evaluation is to assess how well the pilot project is meeting the goals of the NPAIHB Oral Health</p>	

	<p>Program to improve access and quality of care to members of the CTCLUSI and CIT. The evaluation also addresses the evaluation requirement of the Oregon Health Authority (OHA) to meet the conditions of Dental Pilot Projects statute (Oregon Laws 2011, Chapter 716).</p> <p>Elements not directly addressed in the Mekinak Quarterly Reports are addressed in annual updates from the pilot project which include patient surveys. Update to qualitative evaluation studies are provided on an annual basis.</p>
Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (9) Within 24 hours of any incident involving a patient in the care of a trainee which results in any medical occurrence that is life-threatening, requires hospitalization, results in disability or permanent damage, requires medical or surgical intervention or results in death, the sponsor must ensure that a detailed written report, along with the patient's complete dental records, is submitted to the Authority by the supervising dentist.		ID Number MS9
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified. Observations: No incidents reported.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (10) Submit detailed quarterly monitoring reports in a format prescribed by the Authority that include but are not limited to the following categories for the previous quarter: (a) Accomplishments or highlights. (b) Challenges faced and continuous quality improvement activities. (c) Updated project timeline.		ID Number MS10ABC
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified. Observations: Project is in compliance and has submitted the required quarterly monitoring reports to OHA on time.	

Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (10) Submit detailed quarterly monitoring reports in a format prescribed by the Authority that include but are not limited to the following categories for the previous quarter: (d) Data reports: (A) A comprehensive breakdown of each of the data points the project is capturing in its approved evaluation and monitoring plan including anonymized client level data. (B) Data generated by the clinical evaluator.		ID Number MS10D
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified. Observations: Project is in compliance and has submitted the required quarterly monitoring reports to OHA on time.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards (1) "Adverse event" means unnecessary harm due to dental treatment. (C) Number and type of any adverse event or complication that occurred during the reporting period.		ID Number MS10C
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified. Observations: No adverse events or complications have been reported.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards A dental pilot project shall: (11) Follow written standard operating policies and procedures approved by the Authority as outlined in OAR 333-010-0750, Provisional Approval; Final Approval.		ID Number MS11
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>

Observations and Identified Deficiencies:	No deficiencies identified. Observations: All newly hired individuals are trained on the standard operating procedures requirements and manual. A training was held at the NARA Dental Clinic site in Portland in June 2019.
Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
A dental pilot project shall: (12) Use templates and follow guidelines for the submission of documents and other reporting requirements as prescribed by the Authority.		MS12
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified. Project in full compliance.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0760: Dental Pilot Projects: Minimum Standards		ID Number
(13) Provide care only at Authority approved employment/utilization sites.		MS13
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified. Observations: Care is only provided at approved employment/utilization sites and locations.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0770: Dental Pilot Projects: Informed Consent		ID Number
(1) A sponsor must ensure that each patient or person legally authorized to provide consent on behalf of the patient: (a) Is provided written information about the dental pilot project and who will be providing treatment;		IC1A
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>

Observations and Identified Deficiencies:	No deficiencies identified. Observations: Clinic provides informed consent and education to each patient about the role of the DHAT trainee.
Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0770: Dental Pilot Projects: Informed Consent		ID Number
(1) A sponsor must ensure that each patient or person legally authorized to provide consent on behalf of the patient: (b) Gives written consent to be treated by the dental pilot project trainee;		IC1B
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified. Observations: Clinic provides informed consent and education to each patient about the role of the DHAT trainee. Patient provides written consent.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0770: Dental Pilot Projects: Informed Consent		ID Number
(1) A sponsor must ensure that each patient or person legally authorized to provide consent on behalf of the patient: (c) Gives informed consent for treatment by the trainee.		IC1C
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0770: Dental Pilot Projects: Informed Consent		ID Number
(4) Informed consent for treatment: (b) Patient records must document an entry that informed consent for treatment has been obtained and the date the informed consent was obtained. Documentation may be in the form of an acronym such as "PARQ" (Procedure, Alternatives, Risks and Questions) or "SOAP" (Subjective Objective Assessment Plan) or their equivalent;		IC4B
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	

Required Next Steps	Not applicable.
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333-010-0770: Dental Pilot Projects: Informed Consent		ID Number
(4) Informed consent for treatment: (c) Informed consent for treatment must be obtained in writing for procedures identified by the Authority in the application approval letter, and such consent must be included and documented in the patient's record;		IC4C
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0770: Dental Pilot Projects: Informed Consent		ID Number
(4) Informed consent for treatment: (d) A trainee may not perform any procedure for which the patient or patient's guardian has not given informed consent provided; however, in the event of an emergency situation, if the patient is a minor whose guardian is unavailable or the patient is unable to respond, a trainee may render treatment in a reasonable manner according to community standards and in accordance with the trainees approved scope of practice.		IC4D
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	No deficiencies identified.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0790 Dental Pilot Projects: Authority Responsibilities		ID Number
(2) Site visits. (A) Determination that adequate patient safeguards are being utilized;		AR3AA
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	<p>No deficiencies observed.</p> <p>Observations: OHA has approved Dental Pilot Project #100 to operate under an approved application process and evaluation and monitoring plan. DHAT trainees are trained in an approved training program in Alaska. The training of DHAT's is federal recognized under the CHAP program. DHAT's graduate from the 2-year full time training program and enter a preceptorship under direct supervision for 400 hours. Upon completion of the preceptorship, the DHAT operates under standing orders under the required</p>	

	<p>supervision outlined on the practice plan by the supervising dentist. Please see Appendix C for a copy of the standing orders document.</p> <p>The approved Evaluation and Monitoring Plan requires that all procedures completed by the DHAT that are considered irreversible are documented with a pre-prep-post operative intra-oral image.</p> <p>Under the plan, every week, the supervising dentist reviews all charts of irreversible procedures performed by the DHAT.</p> <p>Every quarter, 10 charts drawn from a random sample containing irreversible and are reviewed by an external evaluating dentist. A clinical evaluator is required under 333-010-0760. The external evaluator has no financial or commercial interest in the project and is responsible for conducting a clinical evaluation of the approved pilot project.</p>
Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0790 Dental Pilot Projects: Program Responsibilities (3) Site visits. (a) Site visits shall include, but are not limited to: (B) Validation that the project is complying with the approved or amended application;		ID Number AR3AB
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/> Not Met <input type="checkbox"/>	
Observations and Identified Deficiencies:	No deficiencies identified. Observations: The project is in compliance.	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

333-010-0790 Dental Pilot Projects: Program Responsibilities (3) Site visits. (a) Site visits shall include, but are not limited to: (C) Interviews with project participants and recipients of care;		ID Number AR3AC
Dental Pilot Project Program Requirements	Met <input checked="" type="checkbox"/> Not Met <input type="checkbox"/>	
Observations and Identified Deficiencies:	No deficiencies identified. Observations: OHA conducted interviews with project participants including DHAT trainees, project staff, the	

supervising dentist, clinic staff and tribal council.

Site visit project participants included the following individuals:

Attendees:

Name	Title	Organization
Azma Ahmed, DDS	Dental Director	NARA*
Rick Asaj, DMD	General Dentist, Retired	Advisory Committee**
Bruce Austin, DMD	Statewide Dental Director	OHA***
Miranda Davis, DMD	Dental Director for DHAT Initiative	NPAIHB****
Kari Douglas, DHAT	Dental Health Aide Therapist (DHAT) Trainee	NARA
April Geisler	DHAT Coordinator	NARA
Paula Hendrix, EPDH, M.Ed.	Program Director, Dental Hygiene Program, Oregon Institute of Technology-Salem	Advisory Committee Member
Pam Johnson	Project Manager	NPAIHB
Fred King, MS, PhD	Research Analyst	OHA
Alistair Kok, DDS	Supervising Dentist	NARA
Sarah Kowalski, RDH, MS	Dental Pilot Project Program Coordinator	OHA
Allyson Lecatsas, MBA	Health Director	NARA
Patient - Name Redacted	Redacted	NARA Youth Residential*****
Nathan Perry, CADC	Certified Alcohol Drug Counselor	NARA
Christina Peters	Project Director	NPAIHB
Pam Johnson	Project Manager	NPAIHB
Michael Watkins	Chief Operations Officer	NARA
Gita Yitta, DMD	Dental Director, DPP#100	NPAIHB

*Oregon Health Authority (OHA)

** Advisory Committee Members, Oregon Health Authority Dental Pilot Project Advisory Committee

*** Native American Rehabilitation Association (NARA)

****Northwest Portland Area Indian Health Board (NPAIHB)

***** Individual is a patient at the NARA Youth Residential Inpatient Alcohol and Drug Treatment Program. Their name has been redacted to protect the privacy and identity of the individual.

Group Interview and Comments:

Michael Watkins, CEO, NARA Northwest: Michael Watkins gave an overview of Native American Rehabilitation Association (NARA). NARA was founded in 1970.

“The Native American Rehabilitation Association of the Northwest, Inc. (NARA) provides education, physical and mental health services and substance abuse treatment that is culturally appropriate to Native Americans. NARA is a Native American owned and operated agency located in Portland, Oregon. All services are guided by their Cultural Director who trains and consults with staff on cultural competence and provides cultural programming or clients.”¹

Mr. Watkins provided a background and context to the historical trauma, intergenerational trauma and current trauma of the Alaska Natives and American Indians (AN/AI) in both Oregon and the United States.

The State of Oregon and the United States has a long history of

¹ Native American Rehabilitation Association (NARA), About Us. <https://www.naranorthwest.org/>

poor relations with Alaska Natives and American Indian populations. Mr. Watkins provided a brief history of the goals of assimilation and cultural deidentification of Alaskan Natives and American Indians. Young children, sometimes as young as age 6, were forced to attend the Alaskan Native/American Indian boarding school. The students were forced to cut their hair, were not allowed to dress in traditional clothing and they were punished for speaking their native language.

Chemawa Indian School is a boarding school in Salem, Oregon and continues to operate as a boarding school for Alaskan Natives and American Indians. Many of the policies described above have been abandoned however the historical trauma endured by the Alaskan Native/American Indian population still very much persists. Alaskan Natives and American Indians continue to send their children to Indian boarding schools for several different reasons however unlike the past, children are not forcibly required to attend.

Mr. Watkins expressed that the importance of trauma informed care and culturally appropriate care is critical to the recovery process for the individuals that participate in the programs at NARA.

Kari Douglas, DHAT, NARA Dental Clinic: Ms. Douglas presented to the group on Minimally Invasive Dentistry. This was a research project that Ms. Douglas completed during her second year in the DHAT program in Alaska. A graduation presentation is required of each DHAT student. Continuing Education (CE) is awarded for attending the presentations of other students. Following Ms. Douglas' presentation, a brief question and answer period followed.

Interviews with the supervising dentist, trainee and program staff were conducted via closed door sessions. Only OHA Program Staff and Advisory Committee members were permitted in the interview sessions with the interviewee.

Interview with Supervising Dentists:

Azma Ahmed, DDS, Dental Director, NARA Dental Clinic: Dr. Ahmed is a general dentist and currently serves as the dental director for the NARA Dental Clinic. Dr. Ahmed previously practiced in private dental clinics. She was interested in public health dentistry and wanted a position where she could be part of a program. Dr. Ahmed stated that she enjoys the public health

aspects and the culture of NARA organization, she enjoys being part of a Native American Rehabilitation Association mission and strongly supports the mission.

Dr. Ahmed was hired to develop and implement the NARA Dental Clinic. Without any advertising and simple word of mouth, there was an immediate 6 week waiting list, it was apparent there was a tremendous need in the community.

Dr. Ahmed described access to care for the populations served by the NARA Dental Clinic. She stated that “there is more than one way to increase access to [dental] care.” It is “important to provide culturally appropriate care to the population here, trust is critical to the relationship between the provider and patient.”

Alistair Kok, DDS, Clinical General Dentist, NARA Dental Clinic: Dr. Kok is a general dentist and currently serves as the second dentist at the NARA Dental Clinic. Dr. Kok has held several different types of positions and has worked with a variety of populations both on the east coast in Massachusetts. He explained that he was not looking to work in a profit driven office as he had done that several times in his career already. He explained that his goal was to focus and provide care to underserved populations. Dr. Kok explained that “the patient population at NARA faces great needs...this is seen every day. The problems and the barriers that many of our patient’s face are extreme.”

Both Dr. Ahmed and Dr. Kok explained the role of the supervising dentist role and the role of the DHAT in the dental team. “The DHAT is the face of the dental program when doing outreach into the community. A lot of the individuals will not go anywhere else to obtain treatment.” Patients describe extensive historical trauma when seeing other providers who were not culturally competent.

The following are comments and themes from the interview with the supervising dentists Dr. Ahmed and Dr. Kok:

Comments on Outreach and System Navigation:

- Outreach into the community is key into the prevention of caries (decay).
- Primary questions that are received at outreach events are whether the individual has coverage, where can they find this information out etc. Lack of understanding in the population about the benefits that they have and what coverage is provided. Many adult patients were unaware

	<p>they had dental coverage and were eligible to be seen at the clinic.</p> <ul style="list-style-type: none"> • Oral health education is a critical component of the role of a DHAT. • Questions about efficiency of having the DHAT function in a navigator role. Not performing at the highest skill level if providing navigator services, social work services, etc. • Dental navigation into the system is critical. Relationship building is a component. The goal of the DHAT is to build an initial relationship and over time the DHAT can work their way up to providing higher level services. • Navigation is one component of the DHAT role. Patients need to trust their providers. There is a history of a lack of trust and this is a critical factor for the patients seeking care and following up on care. • Navigators have a role in the Navajo Arizona models. Comments about comparing roles, different scope of practice between DHAT and Community Dental Health Coordinators (CDHC). Navigation is a critical component. Both roles are important. <p><u>Comments on Administrative/Staff:</u></p> <ul style="list-style-type: none"> • Challenges to integrating a new provider type include how to train administrative staff in scheduling procedures. Important to understanding the gaps and incorporate lessons learned into the clinic policies. Integration and onboarding. • DHAT trainee had not been a previous dental assistant or dental hygienist. Important to have exposure to the dental system. • Front desk, OHP coordinator is a critical component for NARA. They function as a patient navigator. Provide assistance for patients to apply for OHP or other benefits. A lot of patients are unaware that that have dental coverage and benefits. <p><u>Comments on the role of the Dental Health Aide Therapist (DHAT):</u></p>
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- DHATs are held to the same standards as other licensed oral health providers in Oregon, dentists and dental hygienists.
- DHAT students received a lot of education around motivational interviewing, oral health education, providing minimally invasive dentistry and preventative dentistry. DHATs play a critical role in a community that does not have a dentist.
- Philosophy of shared decision making is a key factor. The team must be calibrated amongst each other – ultimately the supervising dentist is in charge. This process requires a lot of one on one time. Dentists do not consistently always agree with each other when treatment is needed, type of treatment, etc. This can be challenging. A lot of dentists do not agree, comes from experience and time learning expectations. It is important to schedule monthly meetings, get on each other's page.

Comments on Preceptorship:

- Each procedure must be completed eight times, under direct supervision. There are questions about the need to have a dentist provide direct supervision eight times for fluoride varnish, for example. Recommendations that some of the procedures on the preceptorship list be removed or modified, review for only irreversible procedures for example. There are also challenges due to reduced production during preceptorship, especially given the number of patients that the clinic is trying to see.

Expectations regarding the project:

- There will be a remodeling of the dental team. There are a lot of administrative burdens by participating in the pilot project that would not exist outside of the project. If the workforce model was operating under statute, a large number of things would not be happening. Dr. Ahmed indicated that they are worried about being in compliance with the project rules.

Interview with Trainee:

Kari Douglas, DHAT, NARA Dental Clinic: Kari Douglas is a DHAT with the NARA Dental Clinic. Ms. Douglas graduated from the DHAT program in June 2019 and recently began her preceptorship at the clinic.

Ms. Douglas described her background as an American Indian and the importance of culturally relevant dental care and historical trauma when working with Alaskan Native and American Indian patients.

Ms. Douglas described the training program as a three-year program condensed into 2 years. The program operates Monday through Friday from 8am-6pm. The first year is all didactic and extremely intense, students are located in Anchorage, Alaska. They work on dental typodonts and dental manikins in the first year. In the second year they relocate to Bethel, Alaska where they provide all direct patient care to live patients. They begin the year with dental exams and radiographs; often the students are there until 9pm to complete their notes, finish projects and prepare for exams, etc.

Ms. Douglas reported that she felt the DHAT training program length is sufficient. She did not have prior healthcare experience. Prior to entering the DHAT program she was taking prerequisites to apply to dental hygiene school. She stated that “the DHAT program provides the tools to be successful and is a very intense program.”

The following are comments and themes from the interview with the DHAT trainee Ms. Douglas:

Other comments:

- CE is required – 36 hours every 24 months. In alignment with what is required with EPDH’s or dentists in Oregon are required to do under the Oregon Dental Practice Act.
- A dental hygienist can diagnose periodontal disease in Oregon. DHAT’s do not provide periodontal treatment. The DHAT can see the patient and complete the comprehensive exam under the DHAT model. The DHAT does not periodontal chart.
- DHAT diagnoses within the scope of practice. DHAT has to learn that if a tooth is beyond a DHAT scope, then the supervising dentist and DHAT collaborate. Example, if a

	<p>patient needs a crown. DHAT does not diagnose this.</p> <ul style="list-style-type: none"> • Limitations on the scope of practice are stressed throughout the DHAT training program. Being aware of the limitations of the scope of practice is a key component of the training program. <p>Interview with Program Staff:</p> <p>April Geisler, DHAT Coordinator, NARA: Ms. Geisler was hired to implement the DHAT position at the NARA clinic as well as the other locations including the youth residential program.</p> <p><i>The following are comments and themes from the interview with the Ms. Geisler:</i></p> <ul style="list-style-type: none"> • Onsite dental and medical care are integral to the success of the programs at NARA. Currently hygiene services are completed by a dental hygienist who holds an expanded practice dental hygienist credential (EPDH). Intra oral photos are taken as are radiographs. The dentist reviews the records using a tele-dentistry methodology. This is the same format that will be used with the DHAT. • The facility here has a clinic area with a fully equipped dental chair, lab, sterilizer, etc. Next to the dental room is a medical room for use by the nurse practitioner. • It is cost-effective to use a DHAT at the facility, similar to why a nurse practitioner is used. If higher level services are required, they refer to a medical doctor or dentist. <p>Interview with Program Staff:</p> <p>Nathan Perry, CDAC, NARA Youth Residential Program: Nathan Perry is a certified alcohol and drug treatment counselor (CDAC). Mr. Perry described the role of NARA and the goals of the youth residential program.</p> <p><i>The following are comments and themes from the interview with the Mr. Perry:</i></p> <ul style="list-style-type: none"> • NARA's Youth Residential Treatment Center is a 24-bed facility that provides treatment for individuals between the ages of 12 to 17. Individuals have been diagnosed with a substance use disorder.
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	<p>Upon completion of the program, the individual is hoping to find a job. [REDACTED]. (redacted)</p> <p>The individual explained that trust is an important part of their healing process. [REDACTED] is learning to trust others which is a new process for [REDACTED].</p> <p><i>Note about redaction. A portion of the interview has been redacted to protect the privacy of the individual.</i></p>
Corrective Action	Not applicable.
Required Next Steps	Not applicable.

333-010-0790 Dental Pilot Projects: Program Responsibilities (3) Site visits. (a) Site visits shall include, but are not limited to: (D) Reviews of patient records to monitor for patient safety, quality of care, minimum standard of care and compliance with the approved or amended application.		ID Number AR3AD
Dental Pilot Project Program Requirements	Met <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/>	Not Met <input type="checkbox"/>
Observations and Identified Deficiencies:	<p>No deficiencies identified.</p> <p>DHAT Trainee is currently under the initial stages of their preceptorship. No irreversible procedures have been completed by the DHAT trainee, Ms. Douglas. There are no patient records to review at this time. OHA will conduct a follow up site visit in June 2020 which will contain a chart review.</p>	
Corrective Action	Not applicable.	
Required Next Steps	Not applicable.	

REPORT END