



DATE: November 26, 2019

TO: Commenters - Dental Pilot Project Program, Application #300

FROM: Sarah Kowalski, Dental Pilot Project Coordinator
Dental Pilot Project Program, Oral Health Unit
Public Health Division, Oregon Health Authority

cc: Bruce Austin, Statewide Dental Director
Oregon Health Authority

Cate Wilcox; Manager
Maternal and Child Health Section
Oregon Health Authority, Public Health Division

SUBJECT: Report on Public Comment Period for Dental Pilot Project Application #300

Report of Public Comments

Notice of Intent to Approve: On September 27, 2019, the Oregon Health Authority (OHA) issued a Notice of Intent to Provisionally Approve a dental pilot project application titled, "Dental Hygiene Restorative Function Endorsement Model", submitted by Willamette Dental (appendix A). OHA convened a Technical Review Board (TRB) to help review the application and provide recommendations on whether the application should be provisionally approved or not.

Purpose of Public Comment: To receive public comments on the proposed application to assist the OHA Dental Pilot Project Program with the approval process as outlined in Oregon Administrative Rules (OARs) 333-010-0730.

Dates of Public Comment: October 2, 2019 – November 4, 2019

Public Comments Received: OHA Dental Pilot Project Program received 17 comments from a total of 20 individuals and/or organizations in either support or opposition to the Notice of Intent to Provisionally Approve the dental pilot project application submitted by Willamette Dental.

- 16 comments from a total of 19 individuals and/or organizations were in support of the application.
 - 6 dentists, 8 dental hygienists, 4 subject matter experts, and 1 community stakeholder wrote in support of the application.

- The following organizations have stated support of the application:
 - Capitol Dental Care
 - CareOregon
 - Oregon Dental Hygiene Association
 - Pacific University
 - The Pew Charitable Trust
 - Virginia Garcia Memorial Health Center
 - Willamette Dental Group
- 1 comment on behalf of one organization was in opposition of the application.
 - 1 dentist representing the Oregon Dental Association was in opposition to the approval of the application.

These comments are briefly summarized as follows in order of receipt by the Authority (OHA):

Comment 1: Irini Sahuon, DMD, Managing Dentist, Willamette Dental
 Dr. Sahuon wrote in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Dr. Sahuon’s written comments are attached to this report as “Exhibit A”.

Authority’s Response: The agency thanks Dr. Sahuon for their comments and support.

Comment 2: Tiffany Foy, RDH, President, Oregon Dental Hygiene Association
 Ms. Foy wrote on behalf of the Oregon Dental Hygiene Association in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Ms. Foy’s written comments are attached to this report as “Exhibit B”.

Authority’s Response: The agency thanks Ms. Foy for their comments and support.

Comment 3: Alison Santoro, RDH, EPDH
 Ms. Santoro wrote in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Ms. Santoro’s written comments are attached to this report as “Exhibit C”.

Authority’s Response: The agency thanks Ms. Santoro for their comments and support.

Comment 4: Gail Aamodt, RDH, EPDH, MS
 Ms. Aamodt wrote in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Ms. Aamodt’s written comments are attached to this report as “Exhibit D”.

Authority’s Response: The agency thanks Ms. Aamodt for their comments and support.

Comment 5: Norma Cook, Newburg Church of Christ
 Ms. Cook wrote in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental

Hygiene Restorative Function Endorsement Model.” Ms. Cook’s written comments are attached to this report as “Exhibit E”.

Authority’s Response: The agency thanks Ms. Cook for their comments and support.

Comment 6: John Grant, The Pew Charitable Trusts

Mr. Grant wrote on behalf of The Pew Charitable Trusts in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Mr. Grant’s written comments are attached to this report as “Exhibit F”.

Authority’s Response: The agency thanks Mr. Grant for their comments and support.

Comment 7: Lesley Harbison, RDH

Ms. Harbison wrote in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Ms. Harbison’s written comments are attached to this report as “Exhibit G”.

Authority’s Response: The agency thanks Ms. Harbison for their comments and support.

Comment 8: Jennifer Callans, DMD, Managing Dentist, Willamette Dental Group

Dr. Callans wrote in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Dr. Callans’ written comments are attached to this report as “Exhibit H”.

Authority’s Response: The agency thanks Dr. Callans for their comments and support.

Comment 9: Dora Luz Sandoval, BSDH, EPDH, CDHC

Ms. Luz Sandoval wrote in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Ms. Luz Sandoval’s written comments are attached to this report as “Exhibit I”.

Authority’s Response: The agency thanks Ms. Luz Sandoval for their comments and support.

Comment 10: Jennifer Clemens, DMD, MPH, Dental Director, Capitol Dental

Dr. Clemens wrote on behalf of Capitol Dental Care in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Dr. Clemens’ written comments are attached to this report as “Exhibit J”.

Authority’s Response: The agency thanks Dr. Clemens for their comments and support.

Comment 11: Barry Taylor, DMD, President, Oregon Dental Association

Dr. Taylor wrote on behalf of the Oregon Dental Association in opposition of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled “Dental Hygiene Restorative Function Endorsement Model.” Dr. Taylor’s full written comments are attached to this report as “Exhibit K”.

Dr. Taylor expressed concerns that the application fails to meet the legislative intent of Senate Bill 738 (2011). Dr. Taylor's comments illustrate concern that the application, as written, does not meet the requirements outlined in statute and in the Oregon Administrative Rules. Dr. Taylor stated:

"While many providers in Oregon may not be in favor of dental therapy, as partners in the authorizing pilot project legislation (SB 738), we understand and believe in the importance these projects can have in testing out new models for Oregonians who lack access to care. We supported the original legislation and believe in the pilot project process. We believe that projects should be approved once they have established that they meet the intent of the law, are well designed, protect patients, provide quality care, and are set up in a way to create meaningful data points for later policy discussions. Unfortunately, this application fails to meet that threshold."

Authority's Response: The agency thanks Dr. Taylor for their comments and feedback.

1. A Technical Review Board was convened to review the application and make a recommendation to the Authority for approval or denial of the application. The majority of representatives recommended approval of the pilot project application submitted by Willamette Dental. (Appendix B.)
2. The definition of "focus" is not currently defined in Oregon Administrative Rules (OARs) that govern the Dental Pilot Project Program. While the administrative rules are currently under rulemaking, the Authority cannot require applicants to do more than what is required under current administrative rule.
3. The current administrative rules state under 333-010-0700 Dental Pilot Projects: Purpose (1) The Dental Pilot Projects are intended to evaluate the quality of care, access, cost, workforce, and efficacy by teaching new skills to existing categories of dental personnel; developing new categories of dental personnel; accelerating the training of existing categories of dental personnel; or teaching new oral health care roles to previously untrained persons. The purpose of Dental Pilot Projects is to encourage the development of innovative practices in oral health care delivery systems with a focus on providing care to populations that evidence-based studies have shown have the highest disease rates and the least access to dental care.
 - The application is proposing to test an innovative dental workforce model not currently recognized in Oregon.
 - The application is proposing to target the following populations:
 - ◆ Low-income adults as determined by patients Medicaid eligibility
 - ◆ Children ages 0-18 who are low-income (i.e. Medicaid) and/or moderate to high risk for caries
 - ◆ Adults with diabetes ages 19-64
 - ◆ Older adults ages 65+
 - ◆ Pregnant women who are low-income (i.e. Medicaid) and/or moderate to high risk for caries
4. The Authority's oversight responsibilities include reviews of patient records to monitor for patient safety, minimum standard of care and compliance with the approved or

amended application.

5. An Advisory Committee will be convened to assist the Authority in meeting its responsibilities. Committee members will be tasked with reviewing patient records and participating in site visits where trainees will be trained or utilized.
6. Approved operating projects that fail to comply with OARs 333-010-0700 through 333-010-0820 may be subject to corrective action, suspension or termination.

Comment 12: Rosalie Goode, RDH

Ms. Goode wrote in support of the Authority's Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled "Dental Hygiene Restorative Function Endorsement Model." Ms. Goode's written comments are attached to this report as "Exhibit L".

Authority's Response: The agency thanks Ms. Goode for their comments and support.

Comment 13: Wilber Ramirez-Rodriguez, RDH, EPDH

Mr. Ramirez-Rodriguez wrote in support of the Authority's Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled "Dental Hygiene Restorative Function Endorsement Model." Mr. Ramirez-Rodriguez's written comments are attached to this report as "Exhibit M".

Authority's Response: The agency thanks Mr. Ramirez-Rodriguez for their comments and support.

Comment 14: Kristen Thomas, RDH, EPDH, BS, MS

Ms. Thomas wrote in support of the Authority's Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled "Dental Hygiene Restorative Function Endorsement Model." Ms. Thomas' written comments are attached to this report as "Exhibit N".

Authority's Response: The agency thanks Ms. Thomas for their comments and support.

Comment 15: Alyssa Franzen, DMD, MPH, Dental Director, CareOregon

Dr. Franzen wrote on behalf of CareOregon in support of the Authority's Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled "Dental Hygiene Restorative Function Endorsement Model." Dr. Franzen's written comments are attached to this report as "Exhibit O".

Authority's Response: The agency thanks Dr. Franzen for their comments and support.

Comment 16: Toby Absher, Director of Operations and Project Sponsor, Willamette Dental, Shannon English, DDS, Managing Dentist, Willamette Dental, Matt Sinnott, Director of Government Affairs, Willamette Dental Dayna Steringer, Compliance and Government Affairs Coordinator, Willamette Dental

Mr. Absher, Dr. English, Mr. Sinnott and Ms. Steringer wrote on behalf of Willamette Dental Group in support of the Authority's Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program titled "Dental Hygiene

Restorative Function Endorsement Model.” Mr. Absher, Dr. English, Mr. Sinnott and Ms. Steringer’s written comments are attached to this report as “Exhibit P”.

Authority’s Response: The agency thanks Mr. Absher, Dr. English, Mr. Sinnott and Ms. Steringer for their comments and support.

Comment 17: Lisa Bozzetti, DDS, Dental Director, Virginia Garcia Memorial Health Center Dr. Bozzetti wrote on behalf of CareOregon in support of the Authority’s Notice of Intent to Provisionally Approve the application submitted by Willamette Dental to the Dental Pilot Project Program tit “Dental Hygiene Restorative Function Endorsement Model.” Dr. Bozzetti’s written comments are attached to this report as “Exhibit Q”.

Authority’s Response: The agency thanks Dr. Bozzetti for their comments and support.