



May 21, 2020

Kristin Simmons, RDH, MS
Willamette Dental
6950 NE Campus Way
Hillsboro, Oregon 97124

Re: Final Approval for Dental Pilot Project Application #300, "Dental Therapist Project: Dental Hygiene Model"

Dear Ms. Simmons,

I am pleased to announce final approval of the "Dental Therapist Project: Dental Hygiene Model" dental pilot project program application; hereafter referred to as Dental Pilot Project #300 (DPP #300). The Application, Evaluation & Monitoring Plan and Standard Operating Procedures Manual have all met criteria for final approval in accordance with Oregon Administrative Rule (OAR) 333-010-0750.

On November 26, 2019, the Oregon Health Authority (OHA) provisionally approved the application "Dental Therapist Project: Dental Hygiene Model" (Exhibit A). The project sponsor submitted a detailed Evaluation and Monitoring plan and Standard Operating Policies and Procedures manual within the timeframe required. Each plan has met the requirements of OAR 333-010-0780 and have been approved.

Approval Period: Willamette Dental, as the project sponsor, is authorized to proceed with the implementation of all aspects of DPP #300, unless otherwise specified in this final approval letter. DPP #300 was provisionally approved to operate on November 26, 2019; final approval was issued on May 21, 2020. DPP #300 is approved to operate until January 2, 2025.

Project Activities: Please see Exhibit B for a visual timeline overview of DPP #300 project activities.

Training/Didactic Phase: DPP #300 is authorized to train dental therapy student trainees at Pacific University's School of Dental Hygiene and approved employment/utilization sites listed in the approved application. Dental therapy student trainees will complete portions of their clinical training at approved employment/utilization sites under the supervision of their supervising dentist.

Final Competency Exam: Dental therapist student trainees must complete all aspects of the training program described in the approved application. Upon completion of the education phase, the dental therapist student trainee must take and pass a final competency examination as outlined in both the approved application and evaluation and monitoring plan. Proof of passage must be supplied to OHA upon request in accordance with OAR 333-010-0790.

Supervision and Collaborative Agreement: DPP #300 is required to develop a collaborative management agreement document and submit to OHA for approval for use in DPP #300. OHA has deemed a collaborative agreement is necessary to protect patient safety as required under OAR 333-010-0750. The supervising dentist is responsible for all authorized services and procedures performed by the dental therapist trainee pursuant to a signed collaborative agreement between both the trainee and dentist. A trainee must have a signed collaborative agreement on file with each supervising dentist

who supervises them during the employment/utilization phase. Each signed agreement must be submitted to OHA.

Trainees: DPP #300 must provide notice to OHA within 14 business days of a dental therapist trainee entering the employment/utilization phase in accordance with OAR 333-010-0760. Dental therapist trainees operating under DPP #300 must be licensed registered dental hygienists (RDHs) by the Oregon Board of Dentistry who have a restorative credential and are in good standing with the Board of Dentistry.

- **Trainee Cohorts I, II, III:** DPP #300 is approved to train no more than between 8-10 dental therapist trainees for Cohort I; no more than between 6-10 dental therapist trainees for Cohort II; and no more than between 0-8 dental therapist trainees for Cohort III. DPP #300 will have no more than 28 total dental therapist trainees operating concurrently as part of the approved pilot project. Cohort I will operate concurrently with Cohort II, and Cohorts I and II will operate concurrently with Cohort III. Once Cohort III has moved on to the full utilization phase, all three cohorts will be in their utilization phase providing services at approved employment/ utilization sites. Please see Exhibit C for a visualization of the cohorts training timeline.

Employment/Utilization Sites: Dental therapist trainees operating under DPP #300 may only provide care at OHA approved employment/utilization sites. "Employment/ utilization site" means an OHA approved location, locations, or class of locations where a trainee or trainees provide care during the employment/utilization phase as defined under OAR 333-010-0710.

1. DPP #300 has identified specific locations that will be utilized for training purposes and employment/utilization under Cohorts I and II. Trainees operating under DPP #300 will be limited to providing services to the specific locations listed under Exhibit C.
2. In addition to the locations identified under Cohorts I and II, DPP #300 has itemized all possible locations that may be utilized as training locations and/or employment/utilizations sites throughout the duration of the dental pilot project. Please see Exhibit D for more detailed information. In the event any of the additional locations are selected to be operationalized as training locations or employment/utilization sites, DPP #300 is required to notify OHA at least 90 days prior to implementation.
3. As the locations outlined under Exhibit D have been identified in the approved application, a modification request to incorporate these locations as additional active employment/utilization sites will not be required by the project sponsor.
4. All locations identified as employment/utilization sites must be in compliance with OAR 333-010-0760. Each location and/or trainee will be required to "demonstrate that each of the pilot project's trainees or employment/utilization sites provides care to the underserved populations identified in the application at a rate of at least 51 percent of the total individuals served by the trainee or employment/utilization site on a quarterly basis."
5. All employment/utilization sites must be in compliance with OARs 333-010-0700 through 333-010-0820. DPP #300 is prohibited from providing services at unapproved employment/utilization sites. Additional locations not listed under Exhibit D will require the project sponsor to submit a request for modification to the approved dental pilot project as required under OAR 333-010-0800.

Permitted Scope of Practice: Dental therapist trainees participating in the DPP #300 are authorized to complete the scope of practice as outlined in the approved application and identified in their collaborative management agreement. Please see Exhibit E for a complete list of the dental therapist's scope of practice and the position description approved for DPP #300.

In addition to the scope of practice outlined under Exhibit E, DPP#300 must adhere to specific requirements regarding Nitrous Oxide Analgesia and Primary and Permanent Extractions.

- **Nitrous Oxide Analgesia:** Dental therapist trainees may provide services under their approved scope of practice while administering Nitrous Oxide, provided they have a current Nitrous Oxide permit issued by the Oregon Board of Dentistry. Trainees must furnish evidence to OHA that they have obtained a permit to administer Nitrous Oxide issued to them by the Oregon Board of Dentistry under their designation as a licensed dental hygienist in the State of Oregon. Trainees are required to follow all requirements for administration of Nitrous Oxide as outlined under OAR 818-026-0055. Dental therapist trainees are required to maintain all requirements mandated by the Oregon Board of Dentistry in order to maintain their permit in good standing. Nitrous Oxide must only be administered under the indirect or direct supervision of the trainees' supervising dentist. Dental therapist trainees are prohibited from administering Nitrous Oxide under general supervision.
- **Primary and Permanent Extractions:** Dental therapist trainees must adhere to the extraction parameters for primary and permanent teeth. Please see Exhibit F for more information.
- **Prohibited:** Dental therapist trainees are prohibited from providing services outside the scope of approved practice as outlined in the approved application and this final approval letter.

Informed Consent: DPP #300 is required to adhere to OAR 333-010-0770 regarding obtaining informed consent. All procedures completed under the approved scope of practice of the dental therapist trainee, and completed by the dental therapist trainee, require written informed consent for treatment to be obtained as described under OAR 333-010-0770.

Reporting Requirements: DPP #300 is required to adhere to OAR 333-010-0760 regarding quarterly reporting requirements. DPP #300 will be required to submit detailed quarterly monitoring reports in a format prescribed by OHA. In addition to other reporting requirements, documentation will be required that demonstrates that each of the project's trainees or employment/utilization sites are providing services to the underserved populations identified in the approved application at a rate of at least 51 percent.

Adverse Event Reporting: DPP #300 must report severe adverse events to the OHA Dental Pilot Project Program staff the day they occur as outlined in OAR 333-010-0710. "Adverse event" means harm caused by dental treatment, regardless of whether it is associated with error or considered preventable as defined under 333-010-0710. Please see Exhibit G for complete reporting requirements regarding adverse events.

Project Modifications: Modifications to the approved dental pilot project must be submitted in writing to OHA in accordance with OAR 333-010-0800. All modifications of the approved dental pilot project require OHA approval prior to implementation.

Oregon Administrative Rules: DPP #300 must adhere to Oregon Administrative Rules 333-010-0700 – 333-010-0820 which govern the OHA Dental Pilot Project Program. Please see Exhibit H for a copy of the OARs and Senate Bill 738 (2011) which authorized the Program in statute.

This approval is effective immediately and will expire on January 2, 2025. DPP #300 will be asked to submit quarterly reports and data that describe the progress in meeting the project's stated objectives.

OHA will monitor DPP #300 through written reports and site visit evaluations. In addition, OHA will staff an Advisory Committee made up of dental subject matter experts to assist OHA with meeting its responsibilities as outlined in administrative rule.

Ms. Sarah Kowalski, RDH, MS serves as the Program Coordinator for the OHA Dental Pilot Project Program. You may contact her with any questions at (971) 673-1563 or sarah.e.kowalski@dhsoha.state.or.us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cate Wilcox".

Cate Wilcox, MPH, Manager
Maternal and Child Health Section
Oral Health Program

Cc: Dana Hargunani, MD, MPH, OHA Chief Medical Officer
Stephen Prisby, Executive Director, Oregon Board of Dentistry
Technical Review Board for DPP #300
Project Co-Sponsors and Participants including: AllCare Health, Pacific University School of Dental Hygiene, Smile Keepers, Virginia Garcia