**ACTION NEEDED NOW!**

November 2023

Dear Missouri Dental Hygienists:

Action is needed now to keep your profession! Yes, this is long, but please read and PAY ATTENTION as this proposal may affect your job AND your future!

In April, at the urging of the Office of Dental Health (ODH), the Missouri Dental Board (MDB) approved the concept of developing the Expanded Functions Oral Preventive Assistant (OPA) pilot program, enabling the ODH and the Missouri Dental Association to begin developing the curriculum for the program to be designed to allow an OPA, equivalent to a scaling assistant who would scale teeth above the gumline and probe, with little education, to work on Missourians.

At the July 2023 Missouri Dental Board meeting, the board did move forward with the rule change to allow a pilot program to create the Oral Preventive Assistant to scale teeth above the gumline and probe. At the October meeting, the board also approved the curriculum that this new OPA would have to take.

Note that MDHA was not allowed to see the curriculum, as it was discussed in “closed session” due to it being “proprietary” information since the Missouri Dental Association created the program. Karen Davis, the MDHA President, wrote the board citing the Freedom of Information Act to request the information but was told “no” because the information was “proprietary” even though the content of the material was related to the rulemaking decision.

At this time, our MDHA lobbyist, John Bardgett, Jr., has recommended that MDHA summon hygienists to ask their dentists, as well as dental and dental hygiene faculty and administrators, to write the Governor’s office and tell him how this OPA will be harmful to the public and not in its best interest. If possible, it is best if letters would be on their business letterhead.

Here are some sample letters: [f8fcc3_35a12e88ee0a482193a831f2c54c8698.pdf](missouridha.org) but at this time, they need to go to the Governor and his staff, not to the MDB.

First of all, there is no research supporting just supragingival scaling and one cannot just scale above the gumline.
Secondly, whatever the program is, it will not be up to par with what a dental hygienist learns in an accredited program.

Third, what we need is more accredited dental hygiene programs in areas of need, not a lesser trained persons to scale and probe.

Fourth, when legislation passed to allow for dental pilot programs, MDHA was promised that there would be NO scaling assistant pilot program by the Missouri Department of Health and Senior Services Dental Director and his successor. However, then, the scaling assistant pilot program showed up on the Missouri Dental Board agenda and was initiated without MDHA’s knowledge. So much for trust!

At this time, the OPA pilot program rule has to be moved forward by the Governor’s office and then will be printed in the Missouri Register, a state publication in which all rules are printed for comments by the public. Currently, the state has not yet published this rule. Having dentists and administrators write NOW might stop the process. So, please encourage these letters.

Here is the Governor’s address and one copy needs to be e-mailed to each of the Governor's staff noted below.

The Honorable Mike Parson  
Governor of Missouri  
P.O. Box 720  
Jefferson City, MO 65102

Staff to be e-mailed a copy:

Aaron Willard  aaron.willard@governor.mo.gov
Kelli Jones  kelli.jones@governor.mo.gov
Kyle Aubuchon  kyle.aubuchon@governor.mo.gov

FYI:  
Here is the actual pilot project program language which was approved at the July 2023 MDB meeting that has allowed this rule to move forward. Only two board members voted against the proposal, Dr. Darrell Davis, the board president, and Stacie Scrivner, the RDH member of the board.

Proposal the Rule Change:  20 CSR 2110-2.134 Oral Preventive Assistant Pilot Project

Purpose: To implement the provisions of Section 332.325, RSMo for a pilot project to create an oral preventive assistant.
Pursuant to the provisions of Section 332.325, RSMo, the board is collaborating with the Office of Dental Health (ODH) within the Missouri Department of Health and Senior Services (DHSS) to create a pilot project designed to expand the scope of practice of expanded function dental assistants (EFDA) to include duties currently delegable only to a licensed dental hygienist. The project will temporarily create a new expanded function dental assistant known as an oral preventive assistant.

(2) This pilot project, as set forth in Section (1) above, will necessitate a waiver of the following provisions of Chapter 332 and previously promulgated regulations pursuant to Section 332.325, RSMo.: (A) Specific provisions of Sections 332.093, 332.098 and 332.101 RSMo, and 20 CSR 2110-2.120 in order to temporarily create a new expanded function dental assistant known as an oral preventive assistant.

(3) The scope of practice for an oral preventive assistant shall include taking and recording periodontal probe readings, documenting areas of periodontal concern, and supragingival scaling and polishing. Oral preventive assistants will be limited to practicing on periodontally healthy patients or patients with reversible gingivitis.

(4) Oral preventive assistants shall complete a Board approved oral preventive assistant expanded function training course and apply for an expanded function permit issued by the Board. Before taking an oral preventive assistant expanded function training course, a dental assistant shall successfully complete the Missouri Dental Assisting Skills exam administered by the Dental Assisting National Board or possess current certification as a Certified Dental Assistant from the Dental Assisting National Board.

(5) The provisions of this rule shall only apply to dental healthcare workers providing services pursuant to a pilot project created through a collaboration between ODH and the board and shall expire on August 28, 2026 in accordance with Section 332.325, RSMo.

Note that there will also be an opportunity for the board to change its mind if enough folks write at the appropriate time. Ask for those letters ready to go from your dentist friends, faculty and administrators.

We will ask hygienists to write to the Missouri Dental Board if this rule gets into the Missouri Register. More to come.

Thank you,

Karen Davis, RDH, BSDH, MSDH
MDHA President
karen515davis@gmail.com
816-665-5895

Diann Bomkamp, RDH, BSDH, CDHC, FADHA
MDHA Legislative Chairperson
dbomkamp@sbcglobal.net
314-484-6121 cell