

Brean Arnold
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500 Summer St. NE
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RE: Comment on Chapter 410, Dental Administration of Vaccines Proposed Rules

Thank you for the opportunity to provide comment on OHA's proposed rules related to dental administration of vaccines. As the proponents of the authorizing legislation, HB 2220, we are excited to see this policy move into implementation. We appreciate the agency's work to ensure that providers can be reimbursed appropriately and have access to needed training modules and reporting systems.

We are concerned that OHA's rules have significant repetition of many rules already adopted under the Oregon Board of Dentistry. Unless there is a meaningful reason to have rules listed twice, for administrative ease for future changes and provider understanding, we urge the agency to remove unnecessary duplicative language.

Further, we believe, as consistent with the authorizing legislation, that any rules applied to dentists providing vaccines should be consistent with other provider type requirements- no more or less strict. We urge an evaluation of these rules to ensure that threshold is met.

The requirement found in section 5 (C) in the rules, requiring dentists to maintain a current copy of the CDC reference "Epidemiology and Prevention of Vaccine-Preventable Diseases" was struck from proposed Oregon Board of Dentistry rules by nature of the requirement being difficult to enforce. The reference material should be considered a standard for best practice, and we are happy to include the information on our materials provided to dentists on this issue. However, we suggest removing that requirement in these rules.

Finally, we suggest the agency remove references to Dental Care Organizations in Section 10. Directing dentists to bill a DCO for OHP may be confusing given that the process will be different on the commercial side. Removing this requirement will ensure the process is streamlined for dental offices and will help ensure CCOs have a single source for tracking immunization rates.

Again, we are appreciative of the work and collaboration on these rules. We look forward to our members providing this important preventative service to their patients to ensure all Oregonians can achieve their best oral health.

Sincerely,

Jennifer Lewis-Goff, MPA
Government Affairs Director, Oregon Dental Association