

Brean Arnold
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500 Summer St. NE
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December 17, 2019

RE: Comment on Chapter 410 Dental HbA1c Testing proposed rules

Thank you for the opportunity to provide comments on proposed rules for dental providers to be reimbursed for providing HbA1c testing to patients. We believe this is an important tool for dental providers to be able to provide optimal care for their patients and appreciate the Authority's effort in this area.

We are concerned that the release of information consent requirements found under Section 6 on page 3 adds an additional and unnecessary layer of complexity that could prevent providers from fully utilizing this tool. Dental providers already utilize extensive informed consent and release of information forms in accordance with the Oregon Dental Practice Act as well as the federal Health Insurance Portability & Accountability Act (HIPAA). Additional requirements for a specific HbA1c process are unnecessary here. We encourage you to remove this requirement.

We seek clarification on the language around the Clinical Laboratory Improvement Amendments (CLIA) enrollment requirement and waivers in Sections 3 and 4. It is our understanding that only a waiver is needed for dentists to perform this test, not a certification or registration.

Finally, while we appreciate the effort of listing when a dentist may want to consider utilizing this test as defined in Section 5, we strongly believe that Oregon Administrative Rules should never impede on clinical judgment. Oregon dentists should be able to utilize the HbA1c test whenever they feel their patient would benefit from the tests. We are concerned with the inclusion of these specific items, dentists will be potentially limited in their ability to utilize this important test for the benefit of their patients. We would ask that Section 5 be eliminated.

Thank you for the agency's work on these rules. Providers are eager to incorporate this important test into their workflow as appropriate.

Sincerely,

Jennifer Lewis-Goff, MPA
Director of Government Affairs, ODA

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