

Vermont Oral Health Care for All Coalition

To Senator Ayer and Members of the Senate Health and Welfare Committee
From: Sheila Reed, Julia Shaw, Falko Schilling and Allison Crowley DeMag
Date: February 18, 2015

Re: Proposed Amendments to S.20

This memo is in response to the proposed amendments to S.20 presented on 1/17/2015. Upon review, we object to the proposed change in the language around supervision. We strongly believe that to achieve the purpose of the bill these providers must be able to practice under 'general' supervision.

The Board of Dental Examiners, Administrative Rules section defines supervision as follows:

"Direct supervision" is defined as a dentist agreeing to procedures or treatment performed by appropriate personnel by being readily available at the dental facility for consultation or intervention. [Rule 2.1\(k\)](#)

"General supervision" in the office of a licensed dentist means a dentist with the responsibility to periodically examine patients, agreeing to procedures or treatment performed by appropriate personnel. The dentist must be available for consultation, but does not necessarily have to be physically present at the dental facility when providing general supervision.

"General supervision" (2) in a public or private school or public or private institution means supervision by a dentist with no less than three years experience in accordance with a general supervision agreement as set forth in Part 10 of these rules. When providing general supervision the dentist must be available for consultation but does not have to be physically present at the site where dental hygiene services are provided. [Rule 2.1\(n\)](#)

It is vital that the practitioner be able to work off site and outside of the presence of the supervising dentist. The term general supervision allows for that kind of practice. The use of 'direct supervision' means that the practitioner could not leave the dental facility. We request that the language be left as introduced.

In addition, if the training site meets CODA standards there is no need to divide practitioners into those with master's degrees and those with bachelor degrees. A person meeting CODA criteria will be judged by curriculum and length of training and, if they pass the examination, they are qualified to work under general supervision and a collaborative agreement with their supervising dentist.

Respectfully submitted.