March 8, 2019

 **Via First-Class Mail**

Dr. Paul Levy, Chair

Board of Registration in Dentistry

239 Causeway Street, Suite 500

Boston, MA 02114

 ***Re: Amendments to 234 CMR 5.00***

Dear Dr. Levy:

 Please find letters from the Massachusetts Association of Orthodontists and the Medicaid Orthodontists of Massachusetts Association.

Also let me reinforce my testimony about intraoral digital scanners.  This imaging technology is used in orthodontics, implantology, and other areas of dentistry.  It is replacing alginate and PVS impressions in many offices.  It was not in such wide use the last time the regulations were updated and is currently unregulated.  Anyone can legally operate these scanners; no training or supervision is required.

Patient safety requires this imaging technology to be operated by licensed auxiliaries with proper training under general supervision, exactly the way that exposure of radiographs is now regulated.    I propose a new row inserted after 234 5.11(8).  The evaluation of these images should be a nondelegable duty under 234 CMR 5.12.  This is also similar to the treatment of radiographs, which hygienists can only evaluate for provision of dental hygiene services.

Thank you.

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Very truly yours,

Joel Rosen