Peter Jenny

94 Houghtons Mill Rd

Lunenburg, MA 01462

5 Oct 2021

Dept of Public Health

Bureau of Health Professions Licensure

Board of Registration in Dentistry

239 Causeway St, Suite 500, Boston MA 02114

Subject: Public Hearing comment Regarding 234 CMR 5.0 and OJT assistants

These proposed changes are anti-consumer and anti-patient.

The proposal would increase the scope of work that dental assistants, and in particular minimally trained assistants, the On-the Job Trainee (OJT), could do without their work even being inspected by the dentist (so-called “general supervision” where the dentist could be hundreds of miles away while the procedure is performed, or “direct supervision” where the dentist must be in the facility but still does not have to inspect the work! (234 CMR 2)).

The proposal would hide from the public the fact that the OJT lacks credentials by weakening the requirement to display licenses and identify themselves (in 5.04 Posting of Licenses and Permits, and Identification of Personnel).

Thus the proposal increases the chance of sub-standard work, but hides it more. How could you?

I oppose the increase in procedures that can be delegated, in particular to OJT trainees, and I oppose any decrease in supervision (e.g. N/A to I, I to D, D to G) that is proposed throughout section 5.11 Delegable Procedures, for example lines 44, 50, 52, 53, 57, and 60 through 70, among others.

Dental patients have long been plagued by the inability to know the quality, or lack of quality, of the work being done to them. A hygienist using a painful amount of pressure while measuring pocket depth? Dentist says that wisdom teeth should be removed immediately? How was I to know what’s right? My wisdom teeth stayed in for 20 years after that with no issues, by the way.

Proper training, certification and supervision of staff are one of the few protections patients have to partially mitigate the risk of poor quality dental work.

Allowing minimally trained personnel like OJT to do more procedures increases risk to patients. Some of the risk may be medical harm, and other risk is just of poor quality work – being ripped off.

Dentists must be required to inspect the work of their OJT trainees (Immediate Supervision). If not, maybe dentists should be required to give a 90% discount on their prices.

Or if the proposed changes are approved, maybe I should get my dental work in a 3rd-world country, where nobody knows if the people doing the work are qualified, but at least it will cost less. Thank you.

Peter Jenny