



January 25, 2022

Ms. Sandra Reen  
Executive Director  
Virginia Board of Dentistry  
9960 Mayland Drive, Suite 300  
Henrico, VA 23233

Dear Ms. Reen,

On behalf of the Virginia Dental Association, I would like to reiterate our opposition to the Board of Dentistry's (BOD) proposed changes to 18 VAC 60-30 Regulations Governing the Practice of Dental Assistants.

The BOD already expects dentists to adhere to OSHA and CDC Guidelines, both of which include infection control training for dental assistants in their training guidelines for dental offices. Adding a redundant requirement for infection control training provides no additional benefit to patient or dental team safety and holds the potential to create confusion with regards to overlapping regulations.

The agency [background document](#) on this proposed regulation states that, "Dentists are already expected to adhere to OSHA and CDC guidelines for infection control." It states that the freely available online OSHA and CDC training is satisfactory of this regulation's training requirement. The agency's [Notice of Intended Regulatory Action](#) document further states that it is unaware of reports of infection control violations by dental assistants in Virginia.

We believe the appropriate mechanisms for enforcement already exist through the BOD's current policies with regards to OSHA and CDC Guidelines. This new proposed regulation adds to a growing creep of state and federal compliance paperwork and documentation at a time when administrative staff in small dental offices are already facing unprecedented challenges and there have been [continuing reports](#) of the ongoing impact of COVID on core functions of the Virginia Board of Dentistry such as delays relating to dental staff licensure. A less intrusive and less burdensome alternative for achieving the purpose of the regulation would be to continue to communicate the existing expectation for dental assistants to undergo infection control training without changing the regulations governing the practice of dental assistants.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Dunn'.

Ryan Dunn  
CEO

A handwritten signature in black ink, appearing to read 'Scott Berman'.

Scott Berman, DDS  
President