



South Dakota DENTAL ASSOCIATION

A constituent society of the American Dental Association

S.D. Dental Association
804 N. Euclid, Ste 103
Pierre, SD 57501-1194
Phone (605) 224-9133
FAX (605) 224-9168
www.sddental.org

August 29, 2024

Dr. Scott Van Dam, Chairman
South Dakota State Board of Dentistry
PO Box 1079
Pierre, SD 57501

Dear Dr. Van Dam:

The South Dakota Dental Association (SDDA) requests the State Board of Dentistry promulgate new rules and amend existing rules to affect the following three changes:

1. Allow dental hygienists and registered dental assistants to perform limited restorative functions;
2. Allow registered dental assistants to perform supragingival scaling; and
3. Allow dental assistants to administer nitrous oxide and monitor patients under nitrous oxide.

The primary reason for proposing these changes is to increase the efficiency and effectiveness of the current and future dental workforce in South Dakota. The need for the changes is being driven by a shortage in the allied dental workforce as well as the need to provide increased access to dental services.

The shortage is evident based on the number of dental offices actively seeking to employ both dental hygienists and dental assistants as well as a decrease in the availability of appointments and the lengthening of wait times for appointments. A recent dental workforce report showed that the scarcity of dental staff has reduced dental practice capacity by 11 percent nationwide. Rural areas are affected more dramatically than urban areas. Coinciding with the workforce shortage there has been an increase in demand for preventive care driven primarily by payer incentive programs such as "Health Through Oral Wellness".

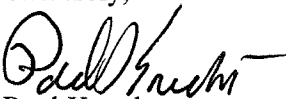
In 2023 the SDDA launched the "Open the Door" campaign to encourage member dentists to provide more appointments to Medicaid beneficiaries. The effort has yielded minimal results as few offices are willing to accept new patients when they are challenged to provide timely appointments to their patients of record.

Allowing competent, and properly trained, staff to perform the functions listed above will not address all of the patient-access issues South Dakota is currently facing, but it is a step in the right direction.

Enclosed you will find the substance of the rule changes we are asking the Board to consider. We appreciate the fact that the Board might prefer to craft the rules in a fashion that better suits your role as a regulatory body and would welcome the opportunity to discuss changes to the rules.

While South Dakota Administrative Rule 1-26-13 requires the Board to either deny this petition or initiate rule-making proceedings within thirty days, we will gladly waive that requirement in order to allow the Board to consider this petition within the structure of your regular meeting schedule.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Knecht", with a horizontal line extending from the end of the signature.

Paul Knecht
Executive Director