

To: Wisconsin Dental Examining Board
Dr Lindsay Knoell – Chair
Brittany Lewin – Executive Director
Katie Vieira (Paff) – Administrative Rules Coordinator



From: WI-Dental Hygienists' Association
Linda Jorgenson
Advocacy Chair

RE: Nitrous Oxide Certification Course Administrative Rules

Date: September 1, 2015

The Wisconsin Dental Hygienists' Association (WI-DHA) Board of Trustees (BOT) wishes to go on record in opposition to changes that were made to the draft of administrative rules for Nitrous Oxide certification for dental hygienists in Wisconsin. We further request that our original recommendation for a 12 hour certification course offered only through CODA accredited dental programs be reinstated in the draft of administrative rules.

Our justifications for this request are as follows:

- 1) CODA Accreditation provides a standardized basis for faculty qualifications, course development and delivery, facilities management, and most importantly, valid competency assessment strategies. CODA's ultimate purpose is to establish rigorous program standards in order that trainees' readiness for licensure and/or certification in specialized skills can be assured. Preparation for the administration of N₂O/O₂ is certainly in the category of a specialized skill. In contrast, the ADA-CERP and AGD-PACE course approval processes are meant to put a stamp of approval on continuing education courses and the instructors who teach them. ADA-CERP and AGD-PACE should not be equated with CODA accreditation. While ADA-CERP and AGD-PACE are entirely appropriate for continuing dental education courses, they offer no mechanisms for evaluating competency and readiness for licensure or certification. Therefore, we ask that the administrative rules state that N₂O/O₂ certification courses be taught only in CODA accredited dental or dental hygiene programs.
- 2) The draft of administrative rules has a list of topics that must be covered in the N₂O/O₂ certification course as well as a requirement for 3 inductions to be performed under the supervision of course instructors. Based on the experiences of instructors in other states with requirements identical to those proposed for Wisconsin – this instruction takes 12 hours. If the minimum number of hours is shortened to 8 hours, there will not be enough time to cover all the topics adequately. WI-DHA agrees with the topical outline and would not support eliminating any of the required elements listed there nor shortening the course to 8 hours. We respectfully request that a minimum of 12

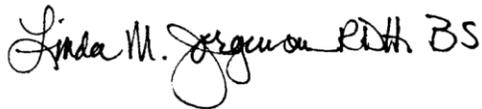
hours of instruction be established in the administrative rules for the N₂O/O₂ certification course.

- 3) The length of a N₂O/O₂ administration certification course, the objectives and topical outline are carefully designed to prepare trainees to safely and effectively perform the specialized skill. Skill assessment is an integral component of a certification course. When trainees are instructed in a well-designed course in accordance with CODA accreditation standards, it provides assurances that the trainee is ready to perform the skill on patients in practice. With less than adequate teaching time, or a truncated topical outline and absent skills assessments, no one can be certain a trainee is really ready to safely and effectively administer N₂O/O₂. Furthermore, the WDEB would have no valid basis for awarding certification to perform the procedure. WI-DHA believes inadequate training increases the risk of liability.

- 4) The majority of states allowing hygienists to administer N₂O/O₂ require the certification course to be taught in CODA accredited programs and that there is a competency assessment component to the instruction. Even if this was not the case, in professional academic circles competency assessment is considered a “best-practice” and WI-DHA supports it. CODA accreditation and competency assessments serve to assure the WDEB and in turn, employers and the public, that an academically rigorous process was followed during instruction and that competency criterion were met by trainees.

Thank you for your consideration of WI-DHA’s recommendations and requests.

Sincerely,



Linda M Jorgenson, RDH
WI-DHA Advocacy Chair 2015-16
lmjorgensonrdh@yahoo.com
612 599-9076 (C)
715 425-2786 (H)