

SERIES 11 RESPONSE TO COMMENTS

Dr. Don E. Patthoff emailed the Board concerning this rule. His email subject line reads Please delete CE requirement. The content of his comment was as follows:

What has been presented in the past is uninformative, actually simplistic, and often seems oblivious of real world daily encounters.

Mandating CE for professionals and targeting all professionals does not address real and other reasonable interventions for a very important and complex social and personal malady. It also does not impact criminal behavior of a few maverick professionals.

Public resources and professionals time can be put to much better use without adding another cost and time burden to already very over filled treatment schedules.

The Board disagrees with Dr. Patthoff. The practice of dentistry is an evolving profession with changing technologies. Continuing education is necessary in order to keep up with changes in the profession and to maintain and improve knowledge and skills.

WV Dental Association, Hallie Mason emailed the Board concerning this rule. Attached to her email was a letter requested additional language in section 3.3.2.k. The current rule reads - The Academy of General Dentistry. Mrs. Mason requested the following language be added - “or its component societies”.

The Board agrees this is a reasonable request and made it part of the changes to the proposed rule.

Carly Scala emailed the Board concerning this rule. The content of her complaint is as follows:

As a dental hygiene educator and clinician, I find it puzzling that others are wanting to remove this CE requirement. Many dental providers are not utilizing the WV CSAPP and the opioid crisis is still prevalent in our area. Until dental providers are appropriately utilizing this system, they are not in compliance with opioid prescribing. Offices could utilize delegates for information access, and many offices are in a crisis with staffing and high overhead related to low reimbursement, but the history of opioid prescribing issues with dental providers in this state should indicate consistent education necessity. In addition to this, the use of illegal drugs (not just opioids) by office staff should still be a concern to providers. Although this course may seem redundant, providers should want to keep information related to substance abuse symptoms in the forefront of their minds to protect patients from staff, even if their prescribing process is seamless. Since not all staff members are licensed providers, there is less likelihood for misconduct for these unlicensed individuals to be reported. As a community member, I feel that this puts citizens at risk. Thank you for your consideration.

The Executive Director of the Board responded to Ms. Scala's email for clarification that she is "talking specifically about the three hour requirement of opioid training every two years for dentists?" Her response was "yes".

While the Board understands where Ms. Scala is coming from, the Board does not wish to require three hours of drug diversion every two years. Initial licensees will be required to obtain the three hours of drug diversion continuing education and any dentist who applies for a DEA permit is required to have eight hours of continuing education on the subject of opioid and substance use disorders to obtain a DEA permit. However, the Board has added drug diversion training to the optional two hour requirement, in section 3.5.3., during the continuing education reporting period in the changes of the proposed rule.

OTHER CHANGES MADE - NOT IN RESPONSE TO COMMENTS

In section 3.5.3.a. the Board has removed infection control and/or occupational hazards, this is where drug diversion training will be inserted. Section 3.5.4. will require two hours of infection control. Renumbering of the proposed rule has occurred in the remainder of section 3.5.

WV Board of Dentistry Susan Combs

From: Donald Patthoff <donalddpatthoff@gmail.com>
Sent: Thursday, April 18, 2024 9:12 PM
To: wvbde@suddenlinkmail.com
Subject: Please delete CE requirement

What has been presented in the past is uninformative, actually simplistic, and often seems oblivious of real world daily encounters.

Mandating CE for professionals and targeting all professionals does not address real and other reasonable interventions for a very important and complex social and personal malady. It also does not impact criminal behavior of a few maverick professionals.

Public resources and professionals time can be put to much better use without adding another cost and time burden to already very over filled treatment schedules.

Sent from my iPhone

Donald E Patthoff, DDS

Home:
1153 Showers Lane
Martinsburg WV 25403
Phone: (304) 263-5116

Office:
300 Foxcroft Ave.
Martinsburg, WV 25401
Phone: (304) 263-0411

Cell: (304) 279-3157=

April 30, 2024

WV Board of Dentistry
PO Box 1447
Crab Orchard, WV 25827

Re: 5SCR11 Legislative Rule Comment

Dear Members of the WV Board of Dentistry:

On behalf of the members of the WV Dental Association Executive Council, please consider the following comment on 5SCR11 – Continuing Education Requirements.

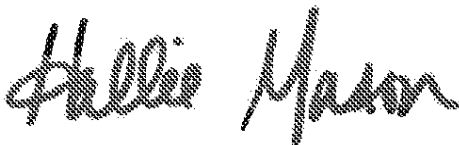
We ask you to amend the proposal by adding "or its component societies" after 3.3.2.k The Academy of General Dentistry.

The language would then read: **3.3.2.k The Academy of General Dentistry or its component societies;**

This amendment would clarify whether the constituent or component societies of the Academy of General Dentistry qualify as approved providers for continuing education courses. Although this may have been generally understood as the language is presented in the rule, our Council would appreciate your further clarification of this fact.

Thank you for your consideration.

Sincerely,



Hallie Mason

WV Board of Dentistry Susan Combs

From: Carly Scala <carly.scala@bridgevalley.edu>
Sent: Tuesday, May 7, 2024 12:24 PM
To: wwbde@suddenlinkmail.com
Subject: *Notice of Public Comment of Proposed Rule 5CSR11*

Follow Up Flag: Follow up
Flag Status: Flagged

As a dental hygiene educator and clinician, I find it puzzling that others are wanting to remove this CE requirement. Many dental providers are not utilizing the WV CSAPP and the opioid crisis is still prevalent in our area. Until dental providers are appropriately utilizing this system, they are not in compliance with opioid prescribing. Offices could utilize delegates for information access, and many offices are in a crisis with staffing and high overhead related to low reimbursement, but the history of opioid prescribing issues with dental providers in this state should indicate consistent education necessity. In addition to this, the use of illegal drugs (not just opioids) by office staff should still be a concern to providers. Although this course may seem redundant, providers should want to keep information related to substance abuse symptoms in the forefront of their minds to protect patients from staff, even if their prescribing process is seamless. Since not all staff members are licensed providers, there is less likelihood for misconduct for these unlicensed individuals to be reported. As a community member, I feel that this puts citizens at risk. Thank you for your consideration.

Carly Scala
Instructor - Dental Hygiene



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Promoting student success, preparing a skilled workforce, and building tomorrow's leaders.

WV Board of Dentistry Susan Combs

From: Carly Scala <carly.scala@bridgevalley.edu>
Sent: Tuesday, May 7, 2024 12:28 PM
To: WV Board of Dentistry Susan Combs
Subject: Re: *Notice of Public Comment of Proposed Rule 5CSR11*

Yes

From: WV Board of Dentistry Susan Combs <wvbde@suddenlinkmail.com>
Date: Tuesday, May 7, 2024 at 12:27 PM
To: Carly Scala <carly.scala@bridgevalley.edu>
Subject: RE: *Notice of Public Comment of Proposed Rule 5CSR11*

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Ms. Scala,

Are you talking specifically about the three hour requirement of opioid training every two years for dentists? Thank you.

Susan M. Combs
Executive Director
West Virginia Board of Dentistry
PO Box 1447
Crab Orchard, WV 25827
(304)252-8266
FAX (304)253-9454

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From: Carly Scala [<mailto:carly.scala@bridgevalley.edu>]
Sent: Tuesday, May 7, 2024 12:24 PM
To: wvbde@suddenlinkmail.com
Subject: *Notice of Public Comment of Proposed Rule 5CSR11*

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members are licensed providers, there is less likelihood for misconduct for these unlicensed individuals to be reported. As a community member, I feel that this puts citizens at risk. Thank you for your consideration.

Carly Scala
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