



SCHOOL OF DENTISTRY
UNIVERSITY of WASHINGTON

May 28, 2020

Ms. Kristin Peterson
Assistant Secretary
Health Systems Quality Assurance
Department of Health
101 Israel Rd SE
Tumwater, WA 98501

Re: COVID-19 Testing

Sent via e-mail only

Dear Ms. Peterson:

On behalf of the Washington State Dental Association (WSDA) and the University of Washington School of Dentistry (UWSod), we are writing to address the great need for COVID-19 testing in dental offices and at our state's dental school.

The dental community of Washington state wholeheartedly shares the goal of reducing transmission of COVID-19 and is doing everything in its power to implement the highest safety standards as non-urgent care resumes. A crucial tool for enabling dentists to help stop the spread of COVID-19 is the ability to provide COVID-19 testing. Such testing will help dentists better determine the safest way to provide care, reduce transmission of COVID-19, and create another layer of protection for patients, dentists, dental students, and staff.

We respectfully request that the Department of Health (Department) and the Dental Quality Assurance Commission (Commission) recognize our state's dentists' ability to perform COVID-19 testing, as it is already part of their existing scope of practice, per RCW 18.32.020(4). Furthermore, allowing dentists to perform COVID-19 testing is consistent with previous guidance from the Commission regarding ordering diagnostic tests related to underlying medical conditions prior to performing dental care.

Specifically, RCW 18.32.020 states that:

“A person practices dentistry, within the meaning of this chapter, who . . . (4) engages in any of the practices included in the curricula of recognized and approved dental schools or colleges”.

Currently, the curriculum of the University of Washington School of Dentistry includes comprehensive education in the medical evaluation and management of patients, including the ordering and interpretation of diagnostic tests. This complies with accreditation and competency requirements issued by the American Dental Education Association and the definition of the “domain of dentistry” provided by the American Dental Association.

The American Dental Education Association’s Competencies for the New General Dentist state that dental graduates must be competent to:

- Select, obtain, and interpret patient/medical data...and use these findings to accurately assess and manage all patients.
- Recognize the manifestations of systemic disease and how the disease and its management may affect the delivery of dental care.

The American Dental Association defines the Domain of Dentistry to include the interpretation of patient diagnostic tests and medical data to assess and manage patients. This includes determining which tests to order, interpreting the results, and using the information in diagnosis and treatment planning. It specifies that dentists must evaluate and utilize available and emerging resources, including laboratory data.

UWSOD includes this content, vertically integrated in at least 50 required courses during the first two years. These courses include the biological structure, function, and pathology of the entire human body. The courses are taught primarily by physicians and many classes are attended together with medical students. Like the medical classes, they include the molecular and cellular basis of disease; immunology; microbiology; cardiac, pulmonary, and renal diseases; blood and cancer; the GI tract; endocrinology; the CNS and PNS; and lifecycles and reproduction.

In the third and fourth years, this knowledge must be applied in the clinical setting. Students must demonstrate competence in assessing and managing patients with complex medical conditions. They are required to medically assess all patients and that includes knowing what diagnostic tests to order and how to interpret the results. Students must know the elements of the CBC and differential and their significance. For example, for HIV-positive patients they must know what blood tests to order and why. This includes the significance of a neutrophil count, viral load, CD count, platelets, and antigen-antibody tests. If a patient has a potential bleeding disorder, they must know what blood tests to order prior to performing surgical procedures. Students must know the appropriate diagnostic tests for Hepatitis, Herpes, Sarcoidosis, Pemphigus, and a wide range of other diseases of significance to the practice of oral medicine. Students must also know how to diagnose anemia and differentiate between iron, folate, and B12 deficiency anemias on blood tests. Patients with hepatic or renal dysfunction may have metabolic and blood chemistry tests ordered prior to selecting an appropriate antibiotic for an oral infection.

In sum, dental graduates must demonstrate expertise in knowing what diagnostic tests to order for their patients and how to interpret the results. To restrict the licensed dentist's ability to do this would require him/her to commit malpractice and endanger patients in some cases. Therefore, ordering and interpreting diagnostic tests is certainly within the scope of practice and we believe that subsection (4) of RCW 18.32.020 exists precisely because the practice of dentistry continuously evolves, and public health depends upon dental school curricula mirroring that evolution.

As mentioned earlier, in addition to COVID-19 testing being permitted under RCW 18.32.020 (4), the Commission has established a precedent for ordering diagnostic tests related to underlying medical conditions prior to performing dental care by determining that blood glucose screening is within a dentist's scope of practice, as well as a delegable duty.

Similar to blood glucose screening, dentists would only be testing for COVID-19 to assess whether it is safe to provide dental care and the safest way to do so, not to treat an underlying medical condition. Including COVID-19 testing in a dentist's scope of practice would be in alignment with previous guidance from the Commission.

Thank you in advance for your consideration. We look forward to continuing to work with the Department to identify a timely solution to further reduce the transmission of COVID-19 in Washington state. If you would like any additional information, or if you have any questions, please do not hesitate to contact Bracken Killpack at bracken@wsda.org.

Respectfully,



Dennis Bradshaw, DDS
President
Washington State Dental Association



Gary T. Chiodo, DMD, FACD
Professor & Dean
University of Washington School of Dentistry

C: Dr. Julia Richman, Chair, Dental Quality Assurance Commission
Trina Crawford, Executive Director, Dental Quality Assurance Commission
WSDA Board of Directors