



AMERICA'S PEDIATRIC DENTISTS
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November 5, 2024

Board of Dental Examiners
c/o Office of Professional Licensure & Certification
7 Eagle Square
Concord, NH 03301

Re: Impact of Den 304 on Dental Patient Safety & Access to Care

To the New Hampshire Board of Dental Examiners:

On behalf of the 10,800 members of the American Academy of Pediatric Dentistry (AAPD), we express our deep disappointment in the New Hampshire Board of Dental Examiners' recent actions. The AAPD is alarmed by the disregard for public safety and access to care evidenced by the Board's adoption of amendments to Den 304. By moving Den 304 forward, the Board has failed its primary duty of protecting the people of New Hampshire. Rather than promoting health and safety, this regulation will *increase* morbidity among the most vulnerable: children, people with disabilities, and those living with low income.

Leading up to and during the November 4, 2024 meeting, the Board failed to provide any reasonable rationale for Den 304's divergence from nationally accepted existing training standards and workforce practices. In the face of compelling testimony and comments from partners and stakeholders in pediatric dentistry, oral and maxillofacial surgery, dental anesthesiology, and Medicaid dental services, the Board elected to, with complete lack of transparency, put thousands of children in harm's way. The repercussions of this regulation will echo for generations. Pediatric dentists from CODA-accredited training programs will avoid establishing practices in New Hampshire, as they have been stripped of their ability to provide individualized pharmacologic behavior guidance for which they have been thoroughly trained.

The Board failed to present any evidence that an anesthesia infrastructure that can support this workforce shift currently exists or can be developed. Likewise, the Board ignored the financial ramifications of making families now engage with an anesthesia provider for minimal pharmacologic care. Finally, the Board has made the practice of oral health care delivery less safe. No other state, federal or professional organization has grouped moderate sedation with deep sedation/general anesthesia in educational, permitting, or practice requirements. With this recent Board action, New Hampshire has distinguished itself poorly as not understanding the fundamentals of delivery of dental care, particularly to high need populations.

The Board has essentially authorized the creation of a monopoly-based system that allows one group of providers to dominate the use of sedation. The lack of transparency, the lack of supporting evidence, and the contradiction with the ADA educational guidelines suggest this process has been a transaction of convenience by a dental board that no longer understands its primary function and commitment to residents of the state.

TO: The New Hampshire Board of Dental Examiners

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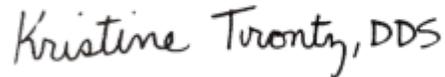
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Children are the most critical resource for a state's future, and New Hampshire has put its children in harm's way with the passing of Den 304 and its uninformed regulation of procedural sedation. We urge the Board to remove these highly concerning chains of influence, salvage integrity with transparency, and recommit to putting the health and safety of the people of your state first, particularly New Hampshire's children.

Sincerely,



Dr. Scott Smith
President, American Academy of Pediatric
Dentistry



Dr. Kristine Marie Trontz
President, NH Academy of Pediatric
Dentistry

CC: Dr. John Rutkauskas, CEO, AAPD
Dr. Paul Casamassimo, Chief Policy Officer, AAPD
Dr. S. Bobby Thikkurissy, Chair, Committee on Sedation, AAPD
Dr. Mindy Hall, Lakeside Smiles Pediatric Dentistry (Alton, NH)
Dr. Sarah Finne, Dental Director, NH Department of Health and Human Services
Gail T. Brown, Esq., Executive Director, NH Oral Health Coalition