



March 15, 2021

Ms. Sandra Reen

Executive Director

Virginia Board of Dentistry

9960 Mayland Drive

Richmond, VA 23233-1463

Dear Ms. Reen,

I am writing on behalf of the Virginia Society of Oral and Maxillofacial Surgeons (VSOMS) to express our concerns over recommended amendments in 18VAC60-21-291 Requirements for administration of moderate sedation. As you are well aware, dentists in the Commonwealth of Virginia are currently allowed to employ and utilize Certified Registered Nurse Anesthetists (CRNAs) services in their practices only if the dentist has fulfilled the anesthesia training requirements set forth by the Board of Dentistry (BOD) in 18 VAC 60-20-10, which requires dentists to obtain permits issued by the BOD if they wish to administer conscious/moderate sedation or deep sedation/general anesthesia in their office as well as to delegate the administration to the CRNAs.

In the proposed amendments to 18VAC60-21-291, we specifically have concerns in section A. Delegation of administration. The recommended amendment would allow a dentist who does not hold a permit to use the services of a Certified Registered Nurse Anesthetist (CRNA). VSOMS is concerned that the absence of oversight by a dentist who currently holds a sedation permit could potentially result in a danger to patients' safety. The dentist who is not trained or permitted in sedation and anesthesia administration may not understand what is needed and the anesthesia provider/CRNA may incorrectly assume that the office is already set and equipped to provide emergency care. Furthermore, the dentist that is not trained or permitted for deep sedation or general anesthesia will not have the adequately trained and or certified staff to handle an anesthetic emergency effectively. We see this situation being a huge problem just waiting to happen. CRNAs are accustomed to practicing in locations where backup from other qualified medical personnel are readily available (direct or indirect supervision) and essential emergency equipment and drugs are taken for granted. The combination of an untrained/unpermitted dentist and remote supervision by an MD/DO anesthesiologist can be dangerous.

Given the recent media coverage related to specific events of adverse outcomes related to anesthesia in the dental offices, there is a significant focus on this issue. If there were to arise an instance where adverse outcome occurred in the dental office in the above stated amended situations where anesthesia was provided by a CRNA without direct or indirect supervision by a qualified dentist or an MD/DO anesthesiologist, it would not be the CRNAs/Board of Nursing who are judged by the public and other regulatory agencies. It will be the profession of dentistry, the Virginia BOD and the dentist in question. This could ultimately lead to another legislative authority removing the privilege dentistry has enjoyed providing anesthesia services to our patients altogether. This would only further impact and worsen the "access to care" concern so frequently voiced when discussing scope of practice issues.

In closing, the VSOMS recognizes and appreciates the skill and training of the CRNAs licensed in the Commonwealth. We appreciate the BOD's efforts to strengthen the anesthesia rules and regulations to ensure that these services are provided in the safest manner possible for the citizens of the Commonwealth. The practice of anesthesia in the dental

office is unique in many respects and poses its own set of challenges that we feel need deliberate consideration. As the charge of the BOD is to ensure the safety of the patients of the Commonwealth of Virginia who undergo anesthesia in our dental offices, we request that the recommended amendment to the section referenced above be retracted. Please contact me at srenapurkar@vcu.edu for any questions or concerns.

Sincerely,

Shravan Renapurkar, DMD FACS