

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:44 PM
To: Rebekah Vanleer
Subject: Fw: Recent dental bill

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:38 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Recent dental bill

From: Aimee Lamb <aimeelambrdh@gmail.com>
Sent: Monday, March 23, 2026 10:18 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Re: Recent dental bill

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada Representatives,

I am writing to urge you to vote no on any legislation that targets the standards for scaling in the dental chair. Reducing these clinical standards is not in the best interest of public safety.

The proposed bills will not solve dental shortages as claimed. Instead, they shift clinical responsibilities to lesser-trained assistants, providing a cheaper labor option for dentists at the expense of quality of care.

Safety and high standards are essential to the dental care the public deserves. I ask that you please vote no on any measures that would reduce these standards.

Sincerely,

Aimee Lamb

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:24 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:53 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to 6.a.v

From: Alicia Jauch <aliciajauch@gmail.com>
Sent: Monday, March 23, 2026 6:47 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

I am writing to oppose the agenda item 6.a.v

I only want licensed and trained dental hygienists to work on patients for teeth cleaning, not dental assistants. I feel my safety and well being, and the safety and wellbeing of all patients, would be put at risk otherwise.

Thank you for your time,

Alicia Jauch
Las Vegas, NV

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:19 PM
To: Rebekah Vanleer
Subject: Fw: Protect Patient Care!

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:45 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Protect Patient Care!

From: allie hummel <hummel_allie@yahoo.com>
Sent: Sunday, March 22, 2026 3:34 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Protect Patient Care!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

My name is Allie Hummel and I have been a Registered Dental Hygienist in the state of Nevada for almost a year now. I am in support for allowing us to practice without supervision (Agenda item 6a IV) to the extent of our scope. And I strongly oppose letting dental assistants with 200 hours of education to be able to scale (Agenda item 6a V). This does not help with the workforce shortage! It decreases patient care and causes harm to the public.

Thank you,
Allie Hummel

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:11 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:46 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: Connect <vlfz.contact@gmail.com>
Sent: Monday, March 23, 2026 2:50 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Alodia Faye Zapata and I am a concerned patient residing in Las Vegas NV 89139. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO (or yes) on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Alodia Zapata
vlz.contact@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:29 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:50 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Amanda McGinness
Sent: Monday, March 23, 2026 5:26 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Amanda McGinness
8232 Mountain Heather Ct
Las Vegas, NV 89149
ak.heath@att.net

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:55 PM
To: Rebekah Vanleer
Subject: Fw: Opposition of 6 a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:27 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition of 6 a.v

-----Original Message-----

From: amy myers <Aymles@yahoo.com>
Sent: Tuesday, March 24, 2026 9:27 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition of 6 a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good Morning

I am writing in opposition to 6 a.v, allowing dental assistants to perform supragingival scaling.

I have practiced dental hygiene for 26 years, but started out as a registered dental assistant. I attended TMCC in 1995-1996 receiving my certificate to work as an assistant.

It is my opinion that dental assisting is a very fast paced, stressful job. I supported a successful dentist as an assistant and we ran all day serving our patients and making sure all of our other duties were accomplished. There were times we would do an adult prophylaxis in our schedule. If there was a booking error or the hygienist was sick, we would fit these patients into our schedule. I never liked it when we had to do the cleaning on our side, because I knew it wasn't done to the level of cleanliness they would get with the hygienist. It was a common practice that I would polish and floss the teeth, then my doctor would slip in quick and scale the lower six anteriors and we would rush them out the door. We needed our room and these inconvenient cleanings just got in the way.

I am not going to say all offices would be run this way, but if I think about the dynamic of the offices I am in now; this is exactly how it would be run.

I will agree that there is a shortage of dental hygienists, but there is also a shortage of dental assistants and front office employees. The Reno/Sparks area is growing in leaps and bounds! It is very difficult to get into a medical doctor. I find myself having to go to Urgent Care because my doctor cannot fit me into her schedule at times. Should we lower the requirements for medical professionals as well?

I absolutely love being a dental hygienist and would like to help find a solution to this shortage, but in reality 6 a.v

isn't the answer. It will lower the quality of cleanings to the public, and burn out the dental assistants and doctors. Please consider another route, open another program in our state, supply more funding to the existing programs. Make it easier to get a Nevada license. I went to school In Nebraska and had to pay \$4800 to get my Nevada license. The process to get my license was so difficult. I had to fly into Las Vegas for a jurisprudence quiz. That was a \$800 adventure. It is my understanding that the quiz is now performed virtually; well done. There are solutions to drawing more hygienists into our state. Giving away our hard fought right to practice as a professional is deplorable.

Thank you for your consideration

Amy Leigh Skreczko
Nevada Dental Hygienist

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:29 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:50 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: Andreas Grigoriou <andreasgrigoriou1989@gmail.com>
Sent: Monday, March 23, 2026 5:34 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,
My name is Andreas Grigoriou and I am a concerned patient residing in Las Vegas. I am writing to you today to strongly oppose Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene

model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,
Andreas Grigoriou

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:54 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSING agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:28 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: OPPOSING agenda item 6.a.v

From: Angela Cameron <meadowrdh@gmail.com>
Sent: Tuesday, March 24, 2026 10:12 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSING agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

NSBDE,

We want to voice our concerns about the proposed shortcut in agenda item 6.a.v.

Please consider:

- How does lowering the standards to become a dental provider who can clean teeth protect the American people from harm?
- Does this proposal protect the dental community's trusted reputation to provide excellent, comprehensive care above and below the gumline?
- Is this proposal an opportunity for optimal oral health to slip through the cracks, potentially leading to lawsuits?

It is shortsighted to make more worker bees by cutting corners. The American people deserve highly skilled, trained, licensed dentists and hygienists to provide comprehensive care even in areas the patient (or proposed assistant) can't see. American's trust dentists and hygienists with their health, and that's not to be taken lightly. It's not prudent to water down the quality care already in place!

Thank you for your time,
Angela and Chris Thiessen

Reno, NV

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:27 PM
To: Rebekah Vanleer
Subject: Fw: Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:52 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

From: [acongro](mailto:acongro@gmail.com) <acongro@gmail.com>
Sent: Monday, March 23, 2026 6:08 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Angelica Congro and I am a registered dental hygienist residing in Las Vegas. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for

our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Angelica Congro, RDH

acongro@gmail.com

March 24, 2026

To The Nevada State Board of Dental Examiners,

The intent of this letter is to show strong opposition of the agenda item 6 a.v.

I have been a registered dental hygienist for nearly 18 years and I can attribute to

Many leading causes of the faux shortage of registered and experienced dental hygienists. I truly believe that the main reason it seems that there is a shortage of registered dental hygienist is due to many of the registered dental hygienists are burnt out and not willing to do the strenuous workload that is compromising their health and also the health of patients. For example many offices have an assisted hygiene model which is very similar to what the agenda 6. A.v would move all hygiene schedules to. It is one of the many root causes of burnout and hygienists leaving the profession. They are registered and could still fill hygiene positions but are seeking work doing something else where they are more valued.

Can you imagine being concerned about your periodontal

Health, bleeding gums, bad breath etc and showing up for your dental appointment to have an undertrained dental assistant slightly pick at your teeth above the gums and polish your teeth, tell you to floss more then set you up to do it again in 3-4 months. That is what should be expected if the agenda moves forward and passes. All hygiene will turn into corporate 20 minute cleanings. It your health that is on the line. I am most certain that most all registered hygienists will leave dentistry all together and there will truly be a shortage. The problem will escalate, it will be your health and the health of the public that will suffer. Hygienists will go back to school for nursing careers or something similar and all the office trained assistants will burn out and realize that what they are doing is a disservice to the public and leave as well. Why would they want to do hygiene work which is very tough for assistants pay? They won't.

Please consider talking to the dentists about treating their hygienists with respect, not pilling more and more work into an already full schedule, giving them PTO, sick leave and be benefits just like most other jobs receive. Consider what's all at stake here and the real reasons behind the faux shortage.

Sincerely,

Anna Hanlon RDH

Lee Annette Lincicome, BS, RDH
alincicome@ymail.com
702-376-4029

Public Comment for NSBDE Meeting March 25, 2026

Agenda Item 6.a.v.

Dentist and Dental Hygienist Supervision of Dental Assistants – NAC 631.220

Dear Nevada State Board of Dental Examiners Members,

I write in opposition to authorizing the board staff to initiate the workshop process on the changes to NAC 631.220 published in the Public Book for tonight's meeting.

The bulk of the changes suggested for NAC 631.220 center around a mechanism that would allow dental assistants who are less educated than dental hygienists and not adequately trained to perform supragingival scaling on patients at the "prophylaxis level." The Nevada Legislature has considered bills with the same intent as these suggested changes to NAC 631.220 three times, and all three times the bills failed. The concept of dental assistants performing supragingival scaling has been found to be untenable at the state legislative level.

Through the 2,932 hours of CODA accredited dental hygiene education I received at a Nevada institution of higher learning, I do not believe there is ever an instance where supragingival scaling alone could be considered prophylaxis level dental hygiene care. My education dictates that prophylaxis requires both supragingival and subgingival scaling in tandem with a wide variety of other dental hygiene procedures, applied using painstakingly developed critical thinking skills. Dental prophylaxis, even on a healthy patient, is a complicated procedure, not one to be delegated to an undereducated, ill-prepared dental assistant.

I do not think there is any reason to proceed with the workshop process on the proposed changes to NAC 631.220 as the basic premise for the proposed changes is not scientifically or professionally sound. Please vote to reject the authorization of board staff to initiate the workshop process for the proposed changes to NAC 631.220.

Respectfully,

Lee Annette Lincicome, BS, RDH
NV Lic. #3293

Lee Annette Lincicome, BS, RDH
alincicome@ymail.com
702-376-4029

Public Comment for NSBDE Meeting March 25, 2026

Agenda Item 6.a.iv.

Dentist Supervision and Authorization of Dental Hygienists – NAC 631.210

Dear Nevada State Board of Dental Examiners Members,

I write in favor of authorizing the board staff to initiate the workshop process on the changes to NAC 631.210 published in the Public Book for tonight's meeting.

While I do not agree with all the amendments to NAC 610.210 suggested, I do think the general intent of the proposed amendments is a valid, expeditious, efficient, and safe way to improve the delivery of dental hygiene care to Nevada's citizens, and by doing so, ease some of the perceived access to care issues resulting from the alleged dental hygiene shortage in the state of Nevada. Allowing hygienists to perform the dental hygiene procedures they are educated for and licensed to provide under a dentist's authorization rather than supervision would immediately, safely, and efficiently enable hygienists to offer care at times and in places that are currently restricted, effectively increasing the amount of dental hygiene care hygienists can deliver, increasing the productivity of every hygienist in the state.

Initiating the workshop process will allow all interested parties to explore the possibilities offered by the proposed changes in a thorough and deliberate manner. Please vote to authorize the board staff to initiate the workshop process on the proposed changes to NAC 631.210.

Respectfully,

Lee Annette Lincicome, BS, RDH
NV Lic. #3293

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:03 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:57 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Annette V. Steneri-Meehan
Sent: Monday, March 23, 2026 8:07 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

Public Comment to the Nevada State Dental Board
Re: Proposal to Permit Dental Assistant Supragingival Scaling

Dear Members of the Nevada State Dental Board,

I am submitting this public comment in strong opposition to the proposal that would permit dental assistants to perform supragingival scaling.

I have been a licensed dental hygienist for over 32 years, and throughout my career I have seen firsthand the complexity involved in providing appropriate periodontal care. Patients who are on a 3–6 month periodontal maintenance recall require continuous evaluation and treatment that often extends beyond supragingival scaling. Once a patient is diagnosed with periodontal disease, they require lifelong maintenance, and subgingival scaling is frequently necessary to properly manage their condition.

This proposal assumes that patients can be appropriately treated with limited procedures alone, which does not reflect the clinical reality. In my experience, there are consistently signs of inflammation that require treatment

below the gumline. Without addressing these areas, patients are not receiving the standard of care needed to maintain their oral health.

Additionally, it is not realistic to expect dentists to have the time necessary to assess each patient's periodontal status and determine the appropriate level of care at every visit while also maintaining the demands of a busy practice. These clinical decisions require focused evaluation and should be performed by trained and licensed dental hygienists.

Dental assistants are not permitted to perform subgingival scaling, and therefore are not equipped to manage the full scope of care that many patients require. Allowing assistants to perform supragingival scaling risks fragmenting care and could result in missed diagnoses, delayed treatment, and progression of periodontal disease.

For these reasons, I urge the Board to reject this proposal and continue to uphold the current standards that prioritize patient safety and comprehensive care.

I respectfully request that this comment be included in the official meeting minutes and entered into the public record as part of the Board's proceedings on this matter.

Thank you for your consideration.

Respectfully submitted,
Annette V. Steneri Meehan, RDH
Reno, Nevada

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Annette V. Steneri-Meehan
604 Sugar Tree Ct
Reno, NV 89511
netterb14@gmail.com

Nevada State Board of Dental Examiners

Subject: **Public Comment in Opposition agenda item: 6.a.v support 6.a.iv**

Dear Members of the Board,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. As a faculty member at a CODA approved dental school, I recognized the importance of standardized education and training when trying to achieve clinical competence. This board has for years relied on having their licensee graduate from a CODA approved program to provide dental hygiene services. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast we support agenda item [6.a.iv](#), allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present, removing supervision barriers enables more frequent and convenient access to preventive care.

For these reasons, I respectfully urge the Board to reject this proposal and uphold the current standards that protect the health and safety of Nevada residents. As well as support increased access to licensed dental hygienists by amending supervision regulations.

Thank you for your time and consideration of this important matter.

Sincerely,
Antonio Ventura, BSDH, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:54 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6.a.v; Support 6.a.iv

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:58 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose 6.a.v; Support 6.a.iv

-----Original Message-----

From: Ashleigh Iniguez <ashleigh.franklin17@gmail.com>
Sent: Monday, March 23, 2026 9:00 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6.a.v; Support 6.a.iv

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This proposal, 6.a.v, is extremely harmful for patient safety and oral health, as well as raising liability. This will not improve access to care; RDHs are highly educated and assistants have their own education path they can choose to pursue. Stop compromising healthcare and patient safety! Start promoting insurance reform proposals.

Sincerely,

Ashleigh Iniguez, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 3:01 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda Item 6.a.v and Support for Expanded RDH Scope in Nevada

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:24 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda Item 6.a.v and Support for Expanded RDH Scope in Nevada

-----Original Message-----

From: Ashley <amchiralde@yahoo.com>
Sent: Tuesday, March 24, 2026 7:11 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda Item 6.a.v and Support for Expanded RDH Scope in Nevada

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to formally oppose Agenda Item 6.a.v, which proposes allowing unlicensed and under-trained dental assistants to perform supragingival scaling under a temporary endorsement.

As a licensed Registered Dental Hygienist, I strongly support improving access to care in Nevada. However, this proposal does not address the root of the issue. Expanding clinical duties to individuals without the appropriate education and licensure risks compromising patient safety and undermines the standards that protect the public.

Dental hygienists are highly trained, licensed preventive specialists. Our education includes extensive coursework in anatomy, pathology, pharmacology, instrumentation, infection control, and patient assessment, all of which are critical to safely performing even "routine" procedures like supragingival scaling. Scaling is not a task-based skill. It requires clinical judgment, the ability to recognize disease, and the training to respond appropriately to complications.

If the goal is to improve access to care, the solution is not to lower the standard of care. The solution is to better utilize and expand the scope of licensed professionals who are already trained to provide these services safely and effectively.

Nevada should be moving toward modernizing dental hygiene practice by expanding functions for Registered Dental Hygienists, including consideration of mid-level practitioner models. Across the country, dental therapists and expanded-function hygienists are successfully increasing access to care while maintaining high standards of safety and accountability. These providers are educated, licensed, and regulated, unlike the proposal currently under consideration.

By contrast, allowing unlicensed individuals to perform clinical procedures creates unnecessary risk for patients and sets a concerning precedent for the profession.

I respectfully urge the Board to reject Agenda Item 6.a.v and instead focus on advancing solutions that prioritize both access and quality of care. Expanding the role of dental hygienists and supporting the development of mid-level practitioners would be a safer, more effective, and forward-thinking approach for the state of Nevada.

Thank you for your time and consideration.

Thank you
Ashley Chiralde, BS, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:18 PM
To: Rebekah Vanleer
Subject: Fw: Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:56 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Item 6.a.v

From: ashley coder <ashleycoder@gmail.com>
Sent: Monday, March 23, 2026 7:54 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

I am writing concerning the item 6.a.v which allows dental assistants to get very minimal training and be able to perform scaling. This is absolutely unacceptable And wrong on many levels.

Firstly, it drastically lowers that proper standard of care for patients, there is no way they can learn with out quite a lot of practice and schooling why need to be done to clean someone's teeth properly? They probably wouldn't even know how to adapt an instrument correctly to the tooth. It's quite a joke, when a I think of all the schooling and 2 full years of training to think that an assistant can just watch a video or shadow someone and learn to scale like a hygienist does. It's quite frankly insulting really.

Secondly, dentists are only doing this so they can replace hygienists with assistants and pay them less. It's not hygienist fault the insurance companies aren't paying like they used to. dentist care more anbout the bottom line than they do about the patient. As a hygienist, I had to complete a National and clinical board exam, as well as 2 full years of intense training at the Dental Hygiene school. This is no walk in the park. I learned anatomy of the head and neck, Chemistry, microbiology, oral cancer, and clinical skills overseen by skilled professional teachers. To say that hygienists are not necessary is very incorrect. Dental Hygienists are critical at dentist offices, we prevent periodontal disease, give oral health instruction, look at medical histories, give nutritional knowledge to patients, and so much more.

I really do feel the by allowing assistants to take our jobs, not only will our profession become extinct, but patient care really will suffer. If you for one second think a cleaning by an assistant will be good

enough to stop periodontal disease, than by all means, you can go to one, but I would never let an assistant clean my teeth. They would probably gouge them, and do irreversible damage to the gums and teeth.

If this passes, let's just say there will be a lot more patient lawsuits, and people who are going to need dentures in the near future, because assistants won't know the first thing about removing calculus or treating periodontal disease. That needs a lot more practice than shadowing or watching a few videos, sorry

Thank you for reading this,
Ashley Coder RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:57 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSE agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:26 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: OPPOSE agenda item 6.a.v

From: ash12286@aol.com <ash12286@aol.com>
Sent: Tuesday, March 24, 2026 8:40 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSE agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners, My name is Ashley Crossland, RDH and I would like to give my opposition to Agenda item 6.a.v and SUPPORT agenda item 6.a.iv. It is unsafe to have people scale patient thst havnt had proper education. Its also a LARGE liability that shouldn't be burdened on the doctor. There are many instances that my education has helped the Dr. with my thorough health history knowledge. One small example with the importance of understanding medications patients have been on, I was able to remind the doctor to be aware of bisphosphonate use, and they changed their treatment plan with that information.

Thank you,
Ashley Crossland, RDH
License #101544

[Sent from AOL on Android](#)

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:57 PM
To: Rebekah Vanleer
Subject: Fw: Opposing 6.a.v and support 6.a.iv

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:58 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing 6.a.v and support 6.a.iv

From: Ashly Macias <ashlymacias1519@gmail.com>
Sent: Monday, March 23, 2026 8:20 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing 6.a.v and support 6.a.iv

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Hello,

My name is Ashly Macias and I am a dental hygienist in the state of Nevada. I am writing to oppose 6.a.v. No one should be in a patients mouth without the proper EDUCATION and CLINICAL TRAINING like hygiene schools are teaching. This is not safe!

I also would like to say that I am in full support of 6.a.iv. Thank you for your time
Ashly

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:50 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to 6.a.v: SUPPORT to 6.a.iv

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:36 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to 6.a.v: SUPPORT to 6.a.iv

From: Ashlynn!! <ashlynn.olsen@yahoo.com>
Sent: Monday, March 23, 2026 9:20 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to 6.a.v: SUPPORT to 6.a.iv

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Hello,

I am a practicing dental hygienist in the state of Nevada and I am concerned about this new proposal to allow untrained, unlicensed "assistants" to scale supragingivally. This same item has been up for debate 3 times in this state alone. In other states where this item or thought has been passed, like Alabama, and Arizona, it hasn't gone as planned. There are still shortages, there are still unanswered and unresolved questions and concerns. New concerns have also arose. Also which dental assistants want MORE responsibility, for the same pay? They will want more money. Which brings us to the same issue that is current. Allowing dental assistants to scale supragingivally will harm patient health (complete subgingival calculus removal is required to promote a healthy periodontium). This same concept has been proposed to prior legislative sessions; and was denied THREE TIMES. This approach compromises patient health in favor of sub-standard care. The NSBDE claims there is a shortage of dental hygienists in the state of Nevada; will dental hygienists want to come to

Nevada and compete with dental assistants? I'll answer this question, it's a strong likely no. It's kind of like a slap in the face. Like why would someone who went to 4 years of college and endured dental hygiene school want to come to Nevada to practice. And it's a domino effect, if those who don't go to school can practice then no one is going to want to go to school. Meaning an even BIGGER shortage of licensed hygienists. Dental hygienists have never before been required to supervise the work of a colleague; time and efficiency will be an issue, which would lead to burnout and a higher rate of attrition of our dental hygienists and further worsen the perceived workforce shortage. We already have shortened times because dentists or office managers feel we don't need anymore.

A few suggestions to address the NSBDE's concern for a shortage of dental hygienists:

- Approve the dental and dental hygiene compact (this would allow hygienists to move to Nevada with fewer obstacles when transferring their license across state lines).
- Campaign to increase funding to our existing dental hygiene programs to increase the number of graduating students each year.
- Train dental offices to utilize the assisted dental hygiene model.
- Eliminate supervision for dental hygienists, which would allow us to provide healthcare services to underserved rural populations who do not have access to a dental office.
- I know Nevada has 2 dental hygiene programs. Compared to Utah's 6 or so. That's where we should start is getting either another school opened or allowing for more students in a graduating class.
- I am in support of 6.a.iv
- Thank you for your time, Ashlynn Frei, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:30 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:50 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: Aylagul Stefan <aylaguls@gmail.com>
Sent: Monday, March 23, 2026 5:14 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Aylagul Stefan and I am a healthcare professional residing in Las Vegas, 89101. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Aylagul Stefan

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:56 PM
To: Rebekah Vanleer
Subject: Fw: Dental Assistants performing scaling, Agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:27 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Dental Assistants performing scaling, Agenda item 6.a.v

From: Barry Brady <bdbrady@att.net>
Sent: Tuesday, March 24, 2026 9:12 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Dental Assistants performing scaling, Agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello -

I see that some people are once again trying to make it legal for dental assistants to perform scaling and other dental procedures on patients.

I vehemently oppose this action. Please deny the proposal.

I want only educated, trained, and licensed dental professionals performing dental procedures on me, my family, and my friends. I want myself, my family, and others to be SAFE!

An uneducated, untrained, unlicensed dental assistant scaling a patient's teeth is like...

1. Asking an auto detailer to change the spark plugs on a vehicle.
2. Asking a custodian to replace a plumbing device on a toilet.
3. Asking a legal assistant to defend a client in the court room.
4. Asking a house framer to be a realtor and sign legal documents for a home sale.

5. Asking a landscaper to be a barber.

Please deny the agenda item 6.a.v.

Thank you.

Barry

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:44 AM
To: Rebekah Vanleer
Subject: Fw: Opposition to proposed changes to the Practice Act allowing assistants to scale supragingivally.

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:41 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to proposed changes to the Practice Act allowing assistants to scale supragingivally.

From: Dean Jewell <djewell715@gmail.com>
Sent: Monday, March 23, 2026 9:44 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to proposed changes to the Practice Act allowing assistants to scale supragingivally.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Barry D. Jewell, BA, RDH
Cynthia L. Jewell, RDH
8644 Highacre Drive
Las Vegas, Nevada 89145

3/23/2026

Nevada State Board of Dental Examiners
2651 N. Green Valley Pkwy, Suite 104
Henderson, NV 89014
nsbde@nsbde.nv.gov

To: the Members of the Nevada State Board of Dental Examiners,

We are writing to formally express our strong opposition to the proposed amendment to the Dental Practice Act that would allow dental assistants to perform supragingival scaling. While the Board's intent may be to address workforce challenges, this proposal compromises the standard of care and poses a significant risk to the oral health of Nevada citizens.

1. Clinical Risk and Substandard Care

Scaling is not merely a cosmetic "cleaning" of the visible tooth surface. Effective periodontal therapy requires the complete removal of subgingival calculus to promote a healthy periodontium and prevent the progression of systemic disease. Allowing assistants—who lack the rigorous, multi-year clinical education of licensed hygienists—to perform "partial" scaling encourages an incomplete treatment model.

By focusing only on what is visible (supragingival), we are essentially masking underlying disease, leading to a false sense of security for the patient and ultimately compromising their long-term health in favor of substandard care.

2. Historical Precedent and Legislative History

It is important to note that this specific proposal has been brought before the legislature in two prior sessions. In each instance, it was denied based on the same valid concerns regarding patient safety and the erosion of professional standards. The clinical facts have not changed; therefore, the conclusion should remain the same.

Specifically:

2023 Legislative Session (SB 310): While this session successfully established the EFDA role, the scope was carefully negotiated and compromised to exclude scaling. The legislature purposefully maintained that instrumentation of the tooth remains the domain of the licensed dental hygienist to ensure patient safety.

2025 Legislative Session (AB 334): This bill originally included language that would have allowed Expanded Function Dental Assistants (EFDAs) to perform scaling. However, following significant public testimony regarding the risks to patient health, Amendment No. 475 was adopted to specifically delete "coronal scaling" and limit the use of ultrasonic scaling units strictly to the removal of orthodontic bonding agents, expressly prohibiting their use on natural teeth.

2025 Legislative Session (SB 495): Introduced shortly after the amendment of AB 334, this bill attempted to create an "on-the-job training" pathway for dental hygiene tasks (Sections 77–79). This "Dental Access Model" was widely criticized as a "deregulation wrapped in false promises of innovation" and failed to pass the legislature.

Amendment 475 to AB 334 (2025) is the most recent "smoking gun" where the legislature explicitly looked at "coronal scaling" and decided to delete it from the bill because it offered "no proven health improvement or benefit for the patient."

The repeated denial of these provisions by the Nevada Legislature underscores a consistent recognition that scaling is a complex clinical procedure that cannot be safely delegated to assistant-level staff without compromising the state's standard of care.

3. Impact on the Workforce Shortage

The NSBDE cites a shortage of dental hygienists; however, this proposal is likely to exacerbate the problem.

Recruitment: Why would highly skilled dental hygienists choose to move to Nevada if they must compete with less-trained assistants performing the same tasks?

Retention and Burnout: Requiring hygienists to supervise the work of assistants adds an unprecedented layer of liability and administrative burden. This will decrease office efficiency and lead to higher rates of attrition, worsening the very shortage the Board seeks to solve.

4. Proposed Strategic Alternatives

Rather than lowering the bar for patient care, We urge the Board to consider the following constructive solutions:

Adopt the Dental and Dental Hygiene Compact: Streamline licensure for out-of-state professionals to allow qualified hygienists to move to Nevada with fewer obstacles.

Increase Educational Funding: Campaign for increased state funding for existing hygiene programs to expand class sizes and graduate more clinicians annually.

Utilize the Assisted Hygiene Model: Train offices to use assistants for high-value supportive tasks (X-rays, coronal polishing, sterilization) rather than clinical scaling.

Eliminate Restrictive Supervision: Allow hygienists to provide care in alternative settings to reach underserved rural populations who currently lack access to traditional dental offices.

We must prioritize the health of Nevadans over administrative convenience. We respectfully request that the Board reject the proposal to allow dental assistants to scale teeth and instead focus on sustainable, high-standard solutions.

We are asking the members of this Board to uphold the high standards of dental hygiene care in the state of Nevada.

Sincerely,

Barry D. Jewell, RDH

djewell715@gmail.com

Cynthia L. Jewell, RDH

cindyjewell19@gmail.com

To: Nevada Joint Health and Human Services Committee Members

senhhs@sen.state.nv.us

From: Batsheva Lederman

Date: March 24, 2026

Re: Opposition to Sections 77-79 of SB 495

As a licensed dental hygienist and supporter of the American Dental Hygienists' Association (ADHA), I strongly urge you to strike sections 77-79 in Nevada SB 495. These sections direct the Nevada Board of Dental Examiners to create an alternative training pathway for dental hygiene licensure. Specifically, this measure permits individuals to complete a course of training under the supervision of a licensed dentist—essentially, on-the-job training. This shortcut to licensure bypasses the critical education provided by CODA-accredited dental hygiene programs.

I believe this bill poses a significant risk to public health and safety by offering a substandard approach to addressing workforce shortages. It also introduces potential inconsistencies in training and undermines public confidence and trust in healthcare providers.

Dental hygienists are clinically trained healthcare professionals who must complete nearly 3,000 hours of education and training. This includes graduating from a CODA-accredited (Commission on Dental Accreditation) program, passing a standardized national written exam, completing a clinical competency exam, and passing a jurisprudence exam. Sections 77-79 would dismantle these critical safeguards and threaten the integrity and professional excellence of the dental hygiene profession.

I urge you to uphold the standards that protect patients and ensure that anyone seeking to practice dental hygiene in Nevada meets the educational and licensure requirements established by the state board. Please strike Sections 77-79 from SB 495! Allowing on-the job training to replace accredited education sets a dangerous precedent and compromises the quality of patient care.

Thank you for your attention to this matter and for your commitment to protecting the oral health of the public!

Batsheva Lederman

To: **Nevada Joint Health and Human Services Committee Members**
senhhs@sen.state.nv.us

From: Bonnie Lunitz

Date: March 24, 2026

Re: Opposition to Sections 77-79 of SB 495

As a licensed dental hygienist and supporter of the American Dental Hygienists' Association (ADHA), I strongly urge you to strike sections 77-79 in Nevada SB 495. These sections direct the Nevada Board of Dental Examiners to create an alternative training pathway for dental hygiene licensure. Specifically, this measure permits individuals to complete a course of training under the supervision of a licensed dentist—essentially, on-the-job training. This shortcut to licensure bypasses the critical education provided by CODA-accredited dental hygiene programs.

I believe this bill poses a significant risk to public health and safety by offering a substandard approach to addressing workforce shortages. It also introduces potential inconsistencies in training and undermines public confidence and trust in healthcare providers.

Dental hygienists are clinically trained healthcare professionals who must complete nearly 3,000 hours of education and training. This includes graduating from a CODA-accredited (Commission on Dental Accreditation) program, passing a standardized national written exam, completing a clinical competency exam, and passing a jurisprudence exam. Sections 77-79 would dismantle these critical safeguards and threaten the integrity and professional excellence of the dental hygiene profession.

I urge you to uphold the standards that protect patients and ensure that anyone seeking to practice dental hygiene in Nevada meets the educational and licensure requirements established by the state board. Please strike Sections 77–79 from SB 495! Allowing on-the-job training to replace accredited education sets a dangerous precedent and compromises the quality of patient care.

Thank you for your attention to this matter and for your commitment to protecting the oral health of the public!

A handwritten signature in black ink, appearing to read "Bonnie Lunitz". The signature is fluid and cursive, with a large, sweeping loop at the end.

To whom it may concern,

I am writing in reference to the NDA request on DA scaling as proposed in agenda item 6.a.v. at the meeting on March 25, 2026. I am against dental assistants scaling in any capacity. As a dental hygienist, and more importantly as a Nevada resident seeking dental care. Updating the NAC631.220 to include dental assistants scaling would be detrimental to the oral health of Nevadans. The proposal of dental assistants completing a partial cleaning, above the gumline, only for a dentist or dental hygienist to go back and complete scaling below the gumline only wastes the patient's and each employee's time. In order to bill a prophylaxis under CDT code D1110, which includes both scaling above (supragingival) and below (subgingival) the gumline of a healthy patient within predetermined parameters such as no bleeding or inflammation of the tissue and probing depths between 1-3 millimeters.

Dental assistants are knowledgeable in restorative treatment assisting the doctor, while hygienists are experts in prevention and periodontal disease. Assistants becoming endorsed to scale with very little formal education in periodontal disease is absurd. In the state of Nevada, dental assistants are not regulated. They are not required to attend any program or curriculum baseline or continue their education. Due to the option for on-the-job training, I do not believe it is appropriate for assistants to use ultrasonic or hand scalers to then become specially endorsed dental assistants with these permissions. Dental hygienists in Nevada graduate with a bachelor's degree and over 3200 hours of clinical patient experience and instrumentation technique refinement. They must pass numerous competencies and take five different board exams to become licensed in the state. Education includes anatomy with extensive focus on the head and neck muscles, nerves and bones, local anesthesia, pharmacology, radiology, law and ethics, pathology, and more! While removing calculus from the teeth, which most view as a hygienist's only job, they are also observing the tissue, screening for oral cancer or other lesions, reading bone-loss levels, ensuring no cysts or infections are visible on the radiograph, assessing airway, tongue ties, lip ties, signs of sexual abuse in minors, and more. Although often separated from the body, the mouth is the direct entrance to the body and signs of systemic problems are often apparent in the mouth too. As a periodontal specialist, a healthy patient receiving a supragingival-only cleaning, will be a periodontally-involved patient down the road if subgingival build up is never removed.

While the NAC 631.220 proposal states a dentist and/or hygienist will supervise and assist with completing the D1110 prophylaxis, no office I have ever been in has time to allot for squeezing in another patient check on top of patients in their own schedules. This is a request to lower the standard of care claiming there is a dental hygienist shortage! The

shortage, if there is one, must be addressed at the source of the problem, the dental hygiene schools and lack of funding. If the schools received more funds, more qualified dental hygienists would enter the job market each year.

I do support expanding supervision requirements for dental hygienists. As licensed providers that meet standardized requirements for practicing in the state of Nevada, it is another way to address a dental hygienist shortage. By allowing dental therapists and hygienists to practice in rural areas with updated supervision parameters, it is one way to reach underserved Nevadans and provide preventative care and triage dental needs.

Expanding one's scope of practice is absolutely critical for the advancement of dentistry and integration of healthcare. I support everyone learning more and adding to their knowledge and skill bases. Let us first start with regulating dental assistants. Impose a certificate and/or board requirement so they too can responsibly expand from a baseline curriculum with a standardized entrance requirement.

Sincerely,

Brenna Reynolds



Prophylaxis, Scaling and Root Planing Codes, and Billing

- **D1110 prophylaxis—adult**
Age 14 or older
- **D1120 prophylaxis—child**
Age 13 or younger

Definition: A primarily preventive treatment to control irritational factors by the removal of plaque and debris from the tooth structures in the permanent arches.

Indications: Applicable for patients with gingivitis or periodontium, where any supragingival deposits are removed to control irritational factors and prevent progression of gingivitis to prevent further progression of periodontitis.

Payment limitation: Subject to each client's policy. A common limitation is two per 12-month period. Additional prophylaxes are optional and may be billed. A prophylaxis is not payable with periodontal scaling and root planing on the same day.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:06 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:36 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Brianna Richards
Sent: Monday, March 23, 2026 10:49 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I would urge the Board to reconsider this proposition to keep our patients safe. The standards need to be upheld, not lowered. I strongly oppose agenda item 6.a.v.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are

prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Brianna Richards
3763 Big Dipper Ct
Sparks, NV 89436
brianna_clancy44@yahoo.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:59 PM
To: Rebekah Vanleer
Subject: Fw: Support for agenda item 6.a.iv and Opposition to agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:25 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Support for agenda item 6.a.iv and Opposition to agenda item 6.a.v

From: Brittany <britthenriod2014@gmail.com>
Sent: Tuesday, March 24, 2026 7:35 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Support for agenda item 6.a.iv and Opposition to agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada Dental Board,

I am writing to express my opposition to agenda item 6.a.v and my support for agenda item 6.a.iv and encourage you to consider why.

I am a licensed clinical practice dental hygienist of ten years. Although I appreciate the effort of the language to address all typical concerns about dental assistants scaling, I still cannot logically make sense of how a temporary scaling dental assistant will realistically work in practice for the following reasons. First, I am unsure of the interest of dental assistants wanting to go through 200 hours of course training, 50 supervised supragingival cleanings, application and endorsement, and then additional duties like supragingival scaling which could add anywhere from 5-30 minutes to their treatment time with potentially no increase in pay. Second, the language states that their work must be directly supervised by the dentist or hygienist. I wonder if dentists will actually sit and watch an assistant scale the whole time, ready to take over if needed? Also why would an employed

hygienist waste their work time observing someone else doing a job they know how to do? That takes away hygiene work time and therefore would decrease productivity. Makes no sense. The language also states that the “employing dentist must inspect and approve the completed procedure immediately after completion and then in order to bill for a full prophylaxis either the dentist or hygienist must immediately follow with subgingival scaling before dismissal”. This essentially means the patient has to go through a second cleaning. I don’t know very many patients who want something done twice. This equates to double chair time. Especially when a hygienist can easily clean both supragingivally and subgingivally at the same time. Very few patients only need supragingival cleaning. The few patients that only need supragingival cleanings are kids ages 10 and younger. That’s the only situation I feel it would be beneficial for both team members and patients. Last but not least, it is overall toeing the line of substandard care for patients. Like I said, most everyone needs subgingival scaling even if only in a few spots like the molars and lower anteriors. I worry that shortcuts will be made and approval will be given and follow up with a hygienist will not happen and then patients will suffer increased periodontal disease. I understand the concern of workforce shortage and recognize the interests of people to come up with a solution. However, I don’t see this as the practical solution unless you specify it’s for children 10 years of age or younger. It will not benefit teenagers and adults and will cost a clinic precious chair time and double everyone team members work load.

In regards to agenda item 6.a.iv about dental hygienists: authorization to perform certain services, it has already been approved through legislation and I agree with the amended language. It will be beneficial in my particular circumstance, my doctor often has army duty and doesn’t know about it until last minute. It will be nice to have his authorization to continue to see patients instead of rescheduling a bunch of patients every time while he’s gone on army duty and pushing patients out farther.

Thank you for considering my reasons for opposition to 6.a.v and my support for 6.a.iv based on my personal experience and expertise.

Sincerely,

Brittany Henriod, BS, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:45 AM
To: Rebekah Vanleer
Subject: Fw: Action item for upcoming meeting

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:40 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Action item for upcoming meeting

-----Original Message-----

From: Brittany Sanchez <besanch18@gmail.com>
Sent: Monday, March 23, 2026 9:11 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Action item for upcoming meeting

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom this concerns,

I am writing to oppose 6.a.v. This will directly affect patient safety and care. As a former registered dental assistant now hygienist I can Attest this would not be a skill that I would have wanted to know. The safety of patients isn't the only concern it's the safety of our dental assistants. Ergonomics and pay raises will be not considered. The time it takes a hygienist to learn each instrument and how to effective scale is not a weekend course. Two years and a national board to prove it's effective. Leave scaling to the specialists which is exactly what a dental hygienist is.

Would also like to support 6.a.iv dental hygienist are more than capable to administer treatments without supervision. We are the specialists.

Brittany Sanchez RDH former RDA

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:13 PM
To: Rebekah Vanleer
Subject: Fw: Opposing agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:40 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing agenda item 6.a.v

From: Bruna Lannes <lannesbt@gmail.com>
Sent: Monday, March 23, 2026 1:53 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am writing you to oppose agenda item 6.a.v.

It would be a disservice to provide care to patients without proper training, testing and education obtained through an extensive dental hygiene program. Improper methods and ability to perform comprehensive dental hygiene treatment could be more harmful than beneficial for patients. This would enable dental practices to provide care below the standard of care. Allowing dental assistants to practice dental hygiene procedures would not only devalue the highly trained hygiene profession but it would potentially put patient's health and care at risk.

-Bruna, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:02 PM
To: Rebekah Vanleer
Subject: Fw: testimony agenda item 6a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:31 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: testimony agenda item 6a.v

From: Candace Meyer <rdhcandace@yahoo.com>
Sent: Monday, March 23, 2026 6:12 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: testimony agenda item 6a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Nevada State Board of Dental Examiners

RE: Opposition to Allowing Unlicensed Personnel to Perform Supragingival Scaling

Dear Members of the Nevada State Board of Dental Examiners,

I respectfully oppose any proposal to permit unlicensed personnel to perform supragingival scaling in Nevada dental offices. This change conflicts with existing statute, lowers the standard of care, and places patients at unnecessary risk.

Nevada law clearly defines dental hygiene as including “preventive and therapeutic periodontal treatment, including scaling,” and restricts these functions to licensed professionals (NRS 631.030; NRS 631.040, 2024). Expanding this responsibility to unlicensed individuals undermines the intent of licensure requirements and creates inconsistency within the statutory framework. Additionally, Nevada regulations require care to meet the accepted community standard, with licensed providers accountable for maintaining that standard (NAC 631.275, 2024). Delegating a technique-sensitive clinical procedure to untrained personnel introduces foreseeable risk and potential liability, particularly in light of prohibitions against unlicensed practice (NRS 631.346, 2024).

Clinically, supragingival scaling is not a benign task. It involves the precise removal of calcified deposits from tooth surfaces adjacent to gingival tissues and requires knowledge of anatomy, instrumentation, and disease

processes. Evidence confirms that nonsurgical periodontal therapy is foundational in controlling inflammation and preventing disease progression, but its success depends on proper technique and complete biofilm removal (Sabatini et al., 2024). Inadequate training is associated with increased rates of gingival injury, root surface damage, hemorrhage, and postoperative sensitivity (Huang et al., 2023). Improper or incomplete scaling also promotes continued inflammation and accelerates plaque and calculus reaccumulation, contributing to the progression of periodontal disease (Sedghi et al., 2021; Ramachandran et al., 2022).

In clinical practice, I have treated patients—particularly young adults—who received years of routine “cleanings” in settings where scaling was performed by inadequately trained personnel. These patients frequently present with persistent gingivitis, significant inflammation, and discomfort during appropriate treatment. This reflects chronic under-treatment, not prevention, and results in delayed care and increased long-term disease burden.

While improving access to care is important, it must not come at the expense of safety or effectiveness. Preventive care is only beneficial when performed correctly and in accordance with evidence-based standards. Allowing unlicensed individuals to perform scaling does not expand quality care—it increases the likelihood of substandard care.

For these reasons, I urge you to reject this proposal and maintain existing licensure requirements to protect patient safety and uphold the standard of care in Nevada.

Respectfully,
Candace Meyer, RDH, RN

References

- Huang, X., Lin, Z., & Hong, Y. (2023). Multisensory preclinical training strategy for periodontal scaling reduces postoperative complications. *BMC Oral Health*.
- Nevada Revised Statutes § 631.030 (2024).
- Nevada Revised Statutes § 631.040 (2024).
- Nevada Revised Statutes § 631.346 (2024).
- Nevada Administrative Code § 631.275 (2024).
- Ramachandran, L., et al. (2022). Trauma and the periodontal tissues: A narrative review.
- Sabatini, S., et al. (2024). Effectiveness of ultrasonic and manual instrumentation in nonsurgical periodontal therapy: A systematic review. *Applied Sciences*, 14(5), 1950.
- Sedghi, L. M., et al. (2021). Periodontal disease: The good, the bad, and the unknown. *Frontiers in Cellular and Infection Microbiology*, 11, 766944.

March 24, 2026

Nevada State Board of Dental Examiners Members:

As a dental hygiene educator for the past 16 years and a licensed dental hygienist for 38 years, I STRONGLY OPPOSE Agenda Item 6.a.v. Dental hygienists are trained and tested throughout their nearly 3,000 hours of CODA accredited curriculum to graduate. They must also pass the National Board Dental Hygiene Examination covering head/neck anatomy, pathology, nutrition, microbiology, pharmacology, medical emergencies, and ethics. Finally, they must also take state and/or regional board exams and successfully pass to be able to apply for a license. This rigorous training ensures both patient safety and complete and comprehensive care for all patients.

Dental hygienists are not just “teeth cleaners”. We are highly trained practitioners who are responsible for not only assessing one’s oral health status but also emphasizing the correlation between oral health and overall health when delivering preventative care to patients. We are often the first line of defense in detecting a problem because of the amount of time that we spend with a patient. Suggesting minimal training and lowering the educational standards pose significant risks to patients. Allowing dental assistants, through the proposed Agenda Item 6.a.v., to supragingival scale is not effective prevention. By doing so, it misses harmful buildup below the gums and doesn’t allow for early detection of disease.

These standards have been in place to protect patients and the public. I urge the Board to respect the education, expertise and licensure of dental hygienists by rejecting Agenda Item 6.a.v.

Respectfully submitted,

Cara Lutes-Kirby, RDH, BSDH, MPH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:55 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:27 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Carli Lusk
Sent: Tuesday, March 24, 2026 9:48 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Carli Lusk
1885 Severn Dr
Reno, NV 89503
carlilusk82@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 3:00 PM
To: Rebekah Vanleer
Subject: Fw: Opposing agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:24 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing agenda item 6.a.v

From: CLK <carriekottke@gmail.com>
Sent: Tuesday, March 24, 2026 7:14 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am a licensed dental hygienist in the state of Nevada (practicing 31 years) and I'm strongly opposing the proposal of dental assistants supragingival scaling of teeth. As all dental hygienists know, aprox 80-90% of calculus is subgingival (below the gumline) of a maintained patient. Even unmaintained, the amount of subgingival calculus is increased. Whoever has proposed this and if passed, those who participate would be violating standard of care and create unnecessary oral health conditions. Please withdraw this proposal and keep the current regulations.

Carrie Kottke RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:16 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:16 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Caryn Solie
Sent: Sunday, March 22, 2026 9:05 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Caryn Solie
PO Box 2602
Sparks, NV 89432
csolierdh@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:53 PM
To: Rebekah Vanleer
Subject: Fw: Agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:59 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda item 6.a.v

-----Original Message-----

From: Cassy Johnston <cassy@pinedaledental.com>
Sent: Monday, March 23, 2026 9:03 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda item 6.a.v

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As a hygienist this item 6.a.v is lowering the standard of care for patients. The pt. will not know until they have full blown untreated or partially treated periodontal disease and are facing tooth loss due to improper care.

Please do not pass this into law.

Cassy Johnston

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:34 PM
To: Rebekah Vanleer
Subject: Fw: Oppostion of agenda item 6 a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:26 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Oppostion of agenda item 6 a.v

From: Catherine Carreiro <catherine.carreiro@unlv.edu>
Sent: Saturday, March 21, 2026 12:53 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppostion of agenda item 6 a.v

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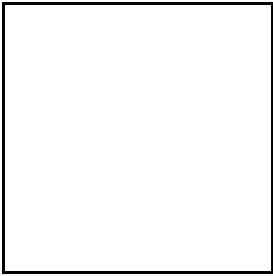
Hello

I wish to share my opinion on Agenda item 6 a.v. The commission on Dental Accreditation CODA, sets national education and clinical training standards to ensure safe, competent care. Allowing individuals who have NOT completed a CODA accredited program- bypasses proven safety bench marks, creates inconsistent training levels and lowers the standard of care in Nevada. In addition, as it currently stands there are no certification requirements for dental assistants in Nevada. Therefore, no agreed formal training or education to be a dental assistant in a Nevada dental office. I've worked with many dentist who openly admit their instrumentation skills are poor and acknowledge the value of their hygienist and the care they provide.

I've practiced for 25 years and in my experience there are few people who do not require subginival scaling during their hygiene appointments - so what is the benefit or need to pass this item? It only lowers the standard of care for our community. Nevada deserves better.

Thank you for your time.

Cathy Carreiro RDH



Catherine Carreiro RDH M.Ed

Clinical faculty

Clinical Science

University of Nevada, Las Vegas

catherine.carreiro@unlv.edu

Office: 702-774-2642

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Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:58 PM
To: Rebekah Vanleer
Subject: Fw: A Concerned Dental Consumer's Perspective — Please Protect the Public

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:26 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: A Concerned Dental Consumer's Perspective — Please Protect the Public

-----Original Message-----

From: Catherine Dennehy <catinfocloud@yahoo.com>
Sent: Tuesday, March 24, 2026 8:30 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: A Concerned Dental Consumer's Perspective — Please Protect the Public

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning,

My name is Catherine Dennehy. I'm a dental consumer and resident of Clark County for 25 years, so what happens in our community matters deeply to me.

I'm writing to urge the Board to stay true to its core mission: protecting the public.

This proposal has come before decision-makers in Carson City three times already, and each time it hasn't moved forward — and for good reason. It simply isn't in the best interest of patients like me.

When I sit in a dental chair, I'm trusting the person beside me with my health. That trust is built on knowing they are educated, trained, and properly licensed. A licensed dental hygienist isn't just a nice-to-have — they are my partner in understanding and maintaining my oral health. That relationship matters, and it shouldn't be compromised.

I'll be honest — this proposal feels less like a public health solution and more like a response to corporate dental pressure to cut payroll costs. If we truly want to tackle the access-to-care problem, the conversation needs to be about insurance companies controlling fees and services, not about lowering the bar for who can provide care.

And the timing couldn't be more critical. As more people are learning just how closely oral health is tied to overall wellness — heart health, diabetes, pregnancy outcomes — shouldn't we be raising the standard of care, not quietly chipping away at it? If we don't push back now, private dental practice may become a thing of the past, and patients will be the ones who suffer.

Please protect the dental health of Nevadans. Ensure that only qualified, licensed professionals are practicing dentistry and dental hygiene in our state — and hold firm to the laws and regulations that exist for our protection.

Thank you sincerely for your time and for the important work you do.

Warm regards,
Catherine Dennehy
Clark County Resident

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:52 PM
To: Rebekah Vanleer
Subject: Fw: Comment of opposition

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:28 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Comment of opposition

-----Original Message-----

From: Catherine Smith <catsmithrdh@gmail.com>
Sent: Tuesday, March 24, 2026 10:19 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Comment of opposition

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi my name is Catherine Smith, and as a licensed dental hygienist and supporter of the American Dental Hygienists' Association (ADHA), I strongly oppose agenda item 6.a.v and support item 6.a.iv. These sections direct the Nevada Board of Dental Examiners to create an alternative training pathway for dental hygiene licensure. Specifically, this measure permits individuals to complete a course of training under the supervision of a licensed dentist—essentially, on-the-job training. This shortcut to licensure bypasses the critical education provided by CODA-accredited dental hygiene programs. I believe this bill poses a significant risk to public health and safety by offering a substandard approach to addressing workforce shortages. It also introduces potential inconsistencies in training and undermines public confidence and trust in healthcare providers. Dental hygienists are clinically trained healthcare professionals who must complete nearly 3,000 hours of education and training. This includes graduating from a CODA-accredited (Commission on Dental Accreditation) program, passing a standardized national written exam, completing a clinical competency exam, and passing a jurisprudence exam. Sections. 77-79 would dismantle these critical safeguards and threaten the integrity and professional excellence of the dental hygiene profession. I urge you to uphold the standards that protect patients and ensure that anyone seeking to practice dental hygiene in Nevada meets the educational and licensure requirements. established by the state board. Allowing on-the- job training to replace accredited education sets a dangerous precedent and compromises the quality of patient care. Thank you for your attention to this matter and for your commitment to protecting the oral health of the public!

Thank you,
Catherine Smith

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:47 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:36 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose 6.a.v

-----Original Message-----

From: Yahoo <celestialrae86@yahoo.com>
Sent: Monday, March 23, 2026 9:52 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,
I strongly oppose agenda item 6.a.v
Thank you
Celeste Hansen RDH, BSDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:31 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:49 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Charlene Moreno
Sent: Monday, March 23, 2026 4:32 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

I personally know how dangerous this situation is. I was a dental assistant for 13 years and I am less than 4 weeks from graduating as a registered dental hygienist. In no way are dental assistants skilled or educated enough to use specific instrumentation to scale on a patient's teeth. This is a very technique sensitive skill that has taken over 2000 hours to achieve. It is absolutely imperative to keep the standards of dental hygiene providers with CODA approved programs.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards

and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Charlene Moreno
7917 Turtle Island Ct
Las Vegas, NV 89129
charleneemoreno@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:28 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda Item 6a V – Expansion of Dental Assistant Duties

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:51 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda Item 6a V – Expansion of Dental Assistant Duties

-----Original Message-----

From: Christina kaiserling <tkaiserling@icloud.com>
Sent: Monday, March 23, 2026 5:50 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda Item 6a V – Expansion of Dental Assistant Duties

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to express my strong opposition to Agenda Item 6a V, which proposes allowing dental assistants with approximately 200 hours of education to perform scaling procedures, including hand scaling, ultrasonic scaling, and air polishing.

As a licensed dental hygienist, I have undergone extensive education and clinical training to safely and effectively perform these procedures. Scaling is not a simple task—it requires a deep understanding of periodontal disease, anatomy, instrumentation, and the ability to recognize and respond to complications. Reducing this level of care to a significantly lower training threshold raises serious concerns regarding patient safety and quality of care.

This proposal does not address the root cause of workforce shortages. Instead, it risks compromising the standard of care and could ultimately lead to increased incidence of undiagnosed or improperly managed periodontal conditions.

Patient safety should always be the top priority. Expanding duties in this manner diminishes the value of comprehensive education and places the public at unnecessary risk.

I respectfully urge the Board to reject this proposal and instead explore solutions that support and strengthen the

dental hygiene workforce without compromising patient care.

Thank you for your time and consideration.

Sincerely,
Christina Williams, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:18 PM
To: Rebekah Vanleer
Subject: Fw: Oppose item 6.a.v.
Attachments: Oppose 6.a.v..docx

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:54 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Oppose item 6.a.v.

From: christine jacinto <jacintochristine1@yahoo.com>
Sent: Sunday, March 22, 2026 5:24 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose item 6.a.v.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board,

I am writing to formally express my strong opposition to agenda item 6.a.v. Agenda item 6.a.v presents a serious threat to the integrity of the dental hygiene profession and the health of our communities. Licensed dental hygienists graduate from accredited programs that include over 3,000 clinical hours. If assistants are permitted to scale, will they also be required to meet this same educational and clinical standard? Scaling is a complex clinical procedure requiring knowledge of anatomy, pathology, pharmacology, and infection control. Dental assistants do not receive this level of education and would require the same rigorous training as hygienists to perform these procedures safely. Not every assistant is prepared to meet this standard, and patient care and public trust depend on maintaining strong educational and clinical requirements.

This agenda item also creates significant potential for misuse. Some dental practices may choose to utilize assistants for basic cleanings, leaving licensed hygienists responsible for the most physically demanding procedures,

such as scaling and root planing. This imbalance could increase burnout among credentialed hygienists and drive many to leave the profession, further worsening the existing shortage of dental hygienists. Allowing assistants to scale also sends a discouraging message to licensed hygienists. It suggests that their education, training, and credentials are not valued, prompting many to seek employment in states that respect and properly compensate for their qualifications.

Rather than lowering professional standards, we should focus on expanding access to accredited dental hygiene programs. This includes increasing the number of qualified instructors and exploring innovative solutions, such as allowing dental offices to serve as supervised training sites for students. If the profession is experiencing a shortage, we must investigate the root causes: poor office morale, lack of benefits, overuse of hygienists without proper ergonomic support, and inadequate tools that contribute to injuries such as carpal tunnel syndrome. These issues require attention, not shortcuts that allow another dental profession to perform procedures hygienists are formally educated and clinically trained to provide.

I strongly urge the committee to strike this agenda item and instead support the development and expansion of high-quality education programs that produce well-trained, respected dental hygiene providers.

Thank you for your time and consideration.

Sincerely,

Christine Jacinto-Chacon

RDH, License #102663

Incline Village, Nevada

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:03 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:30 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Christine Kotek
Sent: Monday, March 23, 2026 5:37 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Christine Kotek
10701 S Eastern Ave Apt 814
Henderson, NV 89052
ckotek85@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:31 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:50 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda 6.a.v

From: Clarissa Felton <felton.clarissa@gmail.com>
Sent: Monday, March 23, 2026 4:57 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Board,

I am writing to respectfully oppose Agenda Item 6.a.v, which proposes allowing unlicensed or under-trained dental assistants to perform supragingival scaling.

As a dental professional, my primary concern is patient safety and maintaining the standard of care expected in the state of Nevada. Supragingival scaling is not merely a cosmetic procedure—it requires a thorough understanding of oral anatomy, disease progression, instrumentation, and the ability to recognize when conditions extend beyond the supragingival level. Without this knowledge, there is a significant risk of missed subgingival calculus, undiagnosed periodontal disease, and improper instrumentation that could harm patients.

Registered Dental Hygienists complete extensive, CODA-accredited education and thousands of hours of clinical training to safely and effectively perform these procedures. Reducing this requirement to a limited number of training hours for unlicensed personnel undermines the integrity of the profession and places patients at unnecessary risk.

Additionally, allowing this change may create confusion for patients regarding provider qualifications and could erode public trust in dental care. Patients deserve to know that the person performing their treatment has met rigorous educational and licensure standards.

While I understand the need to improve access to care, lowering clinical standards is not a safe or appropriate solution. Instead, efforts should focus on expanding the dental hygiene workforce, increasing access to preventive care through licensed professionals, and supporting programs that maintain high-quality care.

For these reasons, I strongly urge the Board to reject Agenda Item 6.a.v.

Thank you for your time and consideration.

Sincerely,
Clarissa Felton, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:30 PM
To: Rebekah Vanleer
Subject: Fw: Dental care

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:38 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Dental care

-----Original Message-----

From: Colleen Lawson <colleen.lawson@att.net>
Sent: Sunday, March 22, 2026 7:17 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Dental care

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I do not want a Dental Assistant cleaning my teeth. They are not properly educated for this role. Dental Hygienists are highly educated, qualified, licensed and regulated to perform such thorough care with specialized instruments.

Regards,

Colleen Lawson 🌸

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 3:00 PM
To: Rebekah Vanleer
Subject: Fw: Agenda item 6 a.v.

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:25 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda item 6 a.v.

From: Crystal Summers <summerscrdh@gmail.com>
Sent: Tuesday, March 24, 2026 7:24 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda item 6 a.v.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear NV Board Members,

I am strongly in opposition to agenda item 6 a.v. for tomorrow's meeting at 6pm on 3/25. I am currently in the process of obtaining my NV license and was horrified to see this back on the agenda. I was born and raised in Las Vegas, went to college in Reno and after 14 years of living in CA, am returning home because "Home means NV!" But this is not the NV I want to be in if standard of care for patients is diminishing. I have seen a shift in dentistry since I first started in 2010. Practices used to be more patient focused and now it seems that production and money are the bigger focus all while neglecting patient care. I have been lucky enough to work in private practices where nothing is sold that isn't needed. My current practice doesn't sell anything. Patients trust us. We recently had to hire a new RDH due to the one that was there for the last 10 yrs moving away. The hygienists coming in were doing 20 min cleanings. This is what they are used to- blow and go dentistry. Patients complained and we weren't happy. Honestly, it has made me terrified to find a good office in Vegas. I refuse to work for any corporate office that has this business model. When I looked at job listings recently, I found that a huge majority are for corporate offices. I would assume they are all in favor of this bill because of course they are short on hygienists. No self respecting hygienist that truly has patient care as top priority would work in such an office. So the real question that should be in play is not whether we should allow assistants to scale above the gumline, what would that really serve the patient, especially one with gum disease? It should

be how do we protect and upkeep the oath we all took to do no harm and put the patient first? Also, by means of getting rid of private equities from running dental offices. These are over saturated and have contributed to the "problem."

Sincerely,
Crystal Summers RDH

To Whom It May Concern:

I am David Tran, a Registered Hygienist, I would like to talk about how cleaning supragingival (above the gum) cleaning does not really help patients. It gives a patient a false sense of health. Every few weeks I have a patient who has had their cleaning every 6 months at another office, but when we take radiographs, we can see that there is sometimes a significant amount of calculus (tartar) left in their mouth.

A good example of this is in the UK for a long time many of the patients only had Supragingival cleaning, but when they arrive in the United States, we would find that many of these patients need a deep cleaning and have had a large amount of bone loss. They went every 6 months, but the cleaning was very superficial. In the end, the patients have to suffer permanent damage. The system in the UK has changed. This example shows that allowing only to do supragingival cleans is just what it is superficial without taking out any disease.

A hygienist must know a good amount of information that takes approximately 10x more education than what is currently purposed.

1. We check for signs of head and neck cancer. We check the gum and look for improvement areas, such as the firmness and stiffness of gingival tissue and what is within normal limits.
2. How something in your stomach acid from (acid reflux) can burn away your teeth, or consumption of soda will do the same.
3. That grinding, nail biting, improper alignment of teeth will cause chipping at the root of the teeth and wear on the occlusal portion of teeth. How different types of bacteria effect the teeth and how to deal with these bacteria.
4. And much more than that.

Of course, Dentist are train to see these things, dentistry is such a fast-paced environment that it is good to have a second pair of trained eyes to increase patient care and not just the through put of patients. We are not considering that Dentist are trained to preform dental procedures such as prophylaxis and periodontal maintenance.

I understand where the need for more hygienists is needed to take care of our needy populations and the delay in appointments. The problem we have is hygienists that would like to be paid for what we do. The dentist is squeezed by the insurance company that has no increase premiums for service rendered. The operations of a dental office increase, but

reimbursements remain the same. It comes down to dental reimbursement and paying hygienist and Dentist a better wage so that the field can work the way it was meant to be, but allowing assistant to cleaning teeth is cutting corner and giving a false sense of health. I hope we can maybe try to get the insurance reimbursement to increase so we could have the providers we need to keep treating patients. Everything has gotten expensive and without and increase dentistry payout it is going to have to compromise our dentistry and the health of our patients instead of getting better.

I am a Hygienist who loves what I do, and I have always tried my best to improve patient care and help the office with through put to make running and office financially make sense. I believe that if both hygienists and dentists come together, we could come up with ways to solve this problem of taking care of patients while keeping our patients healthy. If anyone would like to reach out to me to have a conversation about this, I welcome it. I am personally working as a dental hygienist with an assistant and between me and another hygienist we average about 180 patients seen a week, so I know that this is possible. We see about 46 deep cleanings a week and 134 other different types of cleaning. Please reconsider allowing assistant to do supragingival cleanings. I just feel that it is unethical and it would cause harm to patients instead of where it's intended to help.

I support allowing hygienists to see patients unsupervised. We have been trained from medical emergency and health history and would not see patients that would be high medical risk. If so, we know to ask for medical clearance from a medical provider

Sincerely,

David Tran

davidtranrdh@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:06 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to 6 a.v.

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:30 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to 6 a.v.

From: Dea Minnitte <dminnitte@yahoo.com>
Sent: Sunday, March 22, 2026 10:57 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to 6 a.v.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Nevada State Board of Dental Examiners,

I am in strong opposition to allowing a dental assistant to perform supragingival scaling with only 200 hours of training. I've been an RDH in Nevada for 18 years and 16 of those years have been spent working in rural Nevada. Lowering the standard of care because there is a shortage of hygienists is not an appropriate solution to the problem. Below I have listed specific concerns I have regarding 6 a v, as well as ideas to increase the number of RDH's in Nevada.

Concerns:

1. Using my office as an example, there is no way the dentist or I have time in our schedules to check an assistant's "supragingival scaling" pre and post treatment! Checking someone's scaling is what dental hygiene school is for. This is not safe to be an "on the job training."
2. What happens with the subgingival plaque and calculus? Is it just left visit after visit by the assistant until the patient finally see's an RDH? I know the assistant's work is not going to be checked every time. Those of us who work in dentistry know how often we run behind and barely have time to use the restroom let alone go check an assistant's scaling. So when this patient that's been getting their "supragingival cleanings" ends up seeing an RDH they are likely going to need perio treatment. This is suppose to be beneficial to patients who have been lied to thinking their "cleanings" were being done properly?
3. Is this truly about the patients or making money?

4. If the State Board supports this there will be a mass exodus of the RDH's you do have in Nevada. What's the incentive to stay an RDH if assistants are doing the cleanings? The RDH is just suppose to get all the SRP and perio messes every day all day?

Suggestions to increase number of RDH's in Nevada.....

1. Provide funding to expand RDH programs to be able to graduate more students
2. Create a fast track program specifically for dental assistants to continue their education to become an RDH
3. Create a RDH program in one of the smaller towns/ cities in Nevada like Fallon, Winnemucca, Ely, or Elko. The cost of living in these areas is less than Reno and Vegas and youth in our rural communities may be more likely to pursue hygiene and then move back to their communities to provide care.
4. Make getting a license in this state quicker and easier ~ If an RDH has been working full time in another state they shouldn't have to take another clinical board exam to apply for a license.

Sincerely,

Dea Minnitte-Hamrey, RDH, BS

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:30 PM
To: Rebekah Vanleer
Subject: Fw: Oppose

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:37 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Oppose

From: Deborah Fend <hygienedeb@gmail.com>
Sent: Sunday, March 22, 2026 6:09 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose

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I would like opinion to oppose 6.a.v.
If this passes it would provide substandard care for patients.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:46 PM
To: Rebekah Vanleer
Subject: Fw: Opposition statement 6aV

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:31 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition statement 6aV

From: D S <hygqn1@hotmail.com>
Sent: Tuesday, March 24, 2026 11:59 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition statement 6aV

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President Dr. Ronald West, DMD and members of the Board:

For the record, my name is Deborah Scott
and I reside in Reno, NV .

I am a dental hygienist and work in education and active clinical practice.

I'm m writing in opposition to proposed rule NAC 6aV.

I feel this proposition to allow minimally trained dental assistants to scale patients is dangerous for dental assistants who are not trained and educated to the level of dental hygienist. This also creates liabilities for the assistant and the dental practice including the ultimate liability the dentist/practice owner.

Thank you for this opportunity to testify before you today. I am happy to answer any questions.

Sincerely,
Deborah Scott

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:54 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:58 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: Elaia Anderson <elaiaandersonrdh@gmail.com>
Sent: Monday, March 23, 2026 8:45 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

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Dear Nevada State Board of Dental Examiners,

My name is Elaia Anderson and I am a healthcare professional residing in Clark county 89032 I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our

existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,
Elaia Anderson



Elaia Anderson

Registered Dental Hygienist

 2065748043

 elaiaandersonrdh@gmail.com

 Las Vegas, NV

[LinkedIn](#)

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:11 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSE agenda item 6.a.v
Attachments: Letter to board.pdf

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:48 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: OPPOSE agenda item 6.a.v

From: Ellyn Bagley <ellyn@escobarfamilydentistry.com>
Sent: Monday, March 23, 2026 3:29 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSE agenda item 6.a.v

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Please see the attached PDF as well the letter in the body of this email.
Thank you for your consideration.

Nevada State Board of Dental Examiners:

My name is Ellyn Bagley and I have been a licensed dental hygienist in Nevada for 14 years and was born and raised in our state. As a licensed dental hygienist in the state and a constituent in your district, I am writing to express my strong opposition to item 6.a.v, which would allow an alternative path to dental hygiene licensure through on-the-job training. This provision bypasses the formal education and licensure standards currently required by our state and completed by every practicing Nevada dental hygienist.

I currently work in a private practice and manage RDH's as well as dental assistants. I believe there are certain roles that each play in patient care and I see those roles play out every single day. Every role has value but they differ greatly and blurring those lines is dangerous for the patient and the Dentist who we expect to hold the accountability if something goes wrong.

As both a manager and a provider I have extensive knowledge concerning the fact that dental assistants and hygienists are different. The presence of pocket depth or calculus is not the sole factor in determining if a patient can be scaled by an RDH or an on the job trained assistant. There are so many aspects of a dental hygiene appointment including critically looking at health history, determining what hygiene treatment the patient needs and would benefit from, and discussing the connection of oral health and systemic conditions that so many suffer from. Furthermore, who would be responsible for this training? It would likely fall on the Dentist which would even further strain practices and patient care would suffer. It would introduce inconsistencies in training and undermine public confidence and trust in healthcare providers. I aim to practice with excellence every day as a result of the education I have, how could we expect the same with on-the-job training? An understanding of disease pathology and progression is needed in order to treat patients appropriately, especially with the incidence of periodontal disease continually on the rise and this would be impossible without formal education.

To be accepted into the dental hygiene program, multiple science courses are required as prerequisites. Once accepted, the level of instruction includes multiple 300 and 400 level courses. I, as a dental hygienist am a clinically trained healthcare professional who completed nearly 3,000 hours of education and training. This includes graduating from a CODA-accredited (Commission on Dental Accreditation) program, passing a standardized national written exam, completing a clinical competency exam, and passing a jurisprudence exam. Once licensed we are committed to being lifelong learners and continuing our education.

I urge you to uphold the standards that protect patients and ensure that anyone seeking to practice dental hygiene in Nevada meets the educational and licensure requirements established by our state board. I can acknowledge there is a shortage however we must find a way to uphold the quality of care and safety of our patients.

Thank you for your attention to this matter and for your commitment to protecting Nevadans.

Ellyn Bagley RDH

ellyn@escobarfamilydentistry.com

775-813-9904

--

Ellyn Bagley
Office Manager
Escobar Family Dentistry
532 Humboldt St
Reno, NV 89509
775-786-6168



escobar family dentistry



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Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:04 PM
To: Rebekah Vanleer
Subject: Fw: Oppose agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:30 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose agenda item 6.a.v

From: Emily Caser <eciv82@gmail.com>
Sent: Monday, March 23, 2026 12:28 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

My name is Emily Caser, registered dental hygienist since 2015. I am writing to the board today to oppose agenda item 6.a.v

To allow a dental assistant to perform dental hygiene procedures will place the public in harms way.
We all took an oath to do no harm.

To allow a dental assistant, who will only be minimally trained by a dentist, and only have to take a test administered by a dentist, and will be undertrained, as dentists are so busy with treatment where will they have the time to train the dental assistant for yet another task to complete?

And the hygienist is so slammed with cleanings themselves we refuse to train our replacements.

We took many years of training to get our license, and we require many CE courses throughout the year. Something assistants are now just going to bypass to perform our same duties? To have knowledge of a thorough health history? To know updated rules and regulations from AHA, AAP, premed and contraindications for specific patients?

To understand the anatomy of a tooth and correctly adapt the scaler/cavitron tip along root surface to remove sub gingival calculus? Are these things going to be taught?

Assistants will be burned out. They have too many tasks to do, and are stressed out already when asked to just polish a patient for a dentist, when they have to do the prophylaxis.

Now we want to add the rest of the cleaning to their list?

I hope the dentists are prepared to have to increase wages for the DAs, because every assistant I have talked to is aware they will need a pay increase to do more duties.

This same concept has been proposed to prior legislative sessions; and was denied THREE TIMES.

If the NSBDE claims there is a shortage of dental hygienists in the state of Nevada, the answer is not to underpay dental assistants to do RDH job, and now competing with each other? What RDH will want to come to Nevada? This will not help the shortage!

As these have been suggested before, here are the same ideas to help shortage:

Approve the dental and dental hygiene compact (this would allow hygienists to move to Nevada with fewer obstacles when transferring their license across state lines).

Campaign to increase funding to our existing dental hygiene programs to increase the number of graduating students each year.

Train dental offices to utilize the assisted dental hygiene model.

*I would much rather work as "assisted hygiene" than have the Assistant do it.

I will continue to let my patients know ..ALL patients...that they MUST notify the board to get this proposal oppose and denied. That they have to ask, even if the dental assistant is doing their polish, that the HYGIENIST IS COMPLETING THEIR CLEANING. if not, walk out, reschedule, go to another office where they have a hygienist.

Thank you for your time.

Emily Caser,
RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:16 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to agenda item 6a V

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 1:05 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to agenda item 6a V

From: Erin Hegne <erinhegne@gmail.com>
Sent: Monday, March 23, 2026 11:21 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to agenda item 6a V

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,
I am writing to express my strong opposition to Agenda Item 6a V, which proposes allowing dental assistants to perform supragingival scaling under a temporary special endorsement authorized by a supervising dentist.

As a Registered Dental Hygienist working primarily in the public health sector, I dedicate my career to providing safe, evidence-based preventive care to patients across Nevada. Supragingival scaling is not a simple or purely mechanical task—it requires comprehensive education, clinical judgment, and the ability to recognize underlying periodontal conditions, systemic implications, and patient-specific risk factors. These competencies are developed through rigorous accredited training programs and licensure requirements specific to dental hygiene.

Allowing unlicensed or under-trained dental assistants to perform procedures involving the removal of calculus, plaque, and stain—even under the premise of a “temporary special endorsement”—poses significant risks to patient safety. The use of hand instruments, ultrasonic scalers, and air-polishing devices demands a thorough understanding of instrumentation techniques, infection control, tissue management, and the identification of contraindications. These are not skills that can be adequately taught or assessed through abbreviated or temporary training pathways.

Furthermore, this proposal undermines the integrity of the dental hygiene profession and lowers the standard of care that patients in Nevada both expect and deserve. It creates a precedent where clinical

procedures requiring licensure and accountability are delegated to individuals without the same level of education, regulation, or oversight.

I am particularly concerned with the language in Agenda Item 6.A.V stating that assistants may be “authorized by the dentist” to perform these duties. While dentists play a critical leadership role in patient care, authorization alone cannot replace standardized education, licensure, and competency validation established through the Board and accredited institutions.

In contrast, I would like to express my support for Agenda Item 6.A.IV, which I believe provides a resolution to the workforce shortage that is propelling the dentists in Nevada to undermine dental hygienists and the minimum of 2,932 hours of education that we have received. I believe that 6.A.IV would allow hygienists to practice to the full extent of our scope of practice while keeping patient care and safety at the forefront of our minds.

I respectfully urge the Board to reject Agenda Item 6.A.V in its current form and to prioritize patient safety, professional standards, and the long-term integrity of dental care in Nevada.

Thank you for your time and consideration of this important matter.

Sincerely,

Erin Hegne, RDH, BSDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:50 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:30 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda

From: Faja Jones <faja.jones@gmail.com>
Sent: Tuesday, March 24, 2026 11:20 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners, My name is Fa'ja Jones and I am a dental hygiene student residing in 89108. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v. Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care. Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of substandard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions. Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model. Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v. Thank you for your time and for protecting the health of our community.

Sincerely,
Fa'ja Jones 702-499-9073
Faja.jones@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:47 AM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:36 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Fei Yu
Sent: Monday, March 23, 2026 8:34 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

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Dear Nevada BOD Nevada BOD,

I meant seriously, some of those DAs could not even do polishing right or take proper X-rays. and now we want to give them the tool to actually "could do" some real damage?!

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are

prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Fei Yu
1263 Creek Haven Cir
Reno, NV 89509
dhunono21@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:51 PM
To: Rebekah Vanleer
Subject: Fw: Agenda item 6.a.v oppose

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:29 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda item 6.a.v oppose

From: Florie Mancilla <vanessamancilla@yahoo.com>
Sent: Tuesday, March 24, 2026 11:09 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda item 6.a.v oppose

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This is not safe

This lowers the standard of care

This affects the trust that public health has in dental professionals

I have worked as a dental assistant and dental hygienist in public health and I can tell you the training that an assistant receives is nowhere near the skillset a dental hygienist has.

This will be you or your children in the dental chair one day, think about that.

This is substandard training!

[Yahoo Mail: Search, Organize, Conquer](#)

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:48 PM
To: Rebekah Vanleer
Subject: Fw: Agenda item 6.a.v and agenda item 6.a.iv

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:30 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda item 6.a.v and agenda item 6.a.iv

From: fmpierce56@aol.com <fmpierce56@aol.com>
Sent: Tuesday, March 24, 2026 11:34 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda item 6.a.v and agenda item 6.a.iv

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am **opposed** to the agenda item 6.a.v. . The use of scaling instruments and ultrasonic scaling instruments

by non licensed personnel is dangerous.

These instruments can inflict serious damage to teeth and surrounding tissue when not used properly.

As a Dental Hygienist for many years I know the skill involved in using these types of instruments.

The supragingival calculus removal involves more than the visual removal of debris. Usually there is more calculus

under the gingival margin that needs to be removed even if only 1mm below the margin of tissue that can be felt

with an explorer. which makes it subgingival calculus.

The education of a dental hygienist takes 2,000 to 3,000 hours of working with patients.

Sincerely,

Frances Pierce RDH.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:21 PM
To: Rebekah Vanleer
Subject: Fw: Opposing Agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:54 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing Agenda item 6.a.v

-----Original Message-----

From: Gabby Davalos <gabbydavalos@ymail.com>
Sent: Monday, March 23, 2026 7:12 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opppsing Agenda item 6.a.v

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Good evening, my name is Gabriela, I am registered dental hygienist. I write to you to oppose agenda item 6 a.v. It is not safe to have dental assistants scaling teeth; they do not have the proper education to properly treat patients. One can be trained on the job, but if they do not understand the reasoning behind what they are doing and they don't know the anatomy and what to look for, it can get dangerous. Prior to becoming at dental hygienists I worked as a dental assistant. I did not go to school for dental assistant I was trained on the job. I just did what I was told as an assistant but did not understand the reasoning behind it. Many times in pediatric offices dentists have assistants scale , which they are not allowed to do. The dentists train these assistants to scale teeth. I have been told from these assistants they don't have a clue what they are doing they just randomly scrap the teeth they don't know how to look for calculus or properly remove it. As a hygienist, I see a lot of these patients who come from pediatric offices that have inflamed gums some even needing SRPs because they were not getting the calculus properly removed and have burnished calculus. Hygienist do not have the time to supervise these assistants and check their work, and it will be very confusing for patients on what is happening and a waste of everyone's time. Even patients with a healthy mouth have subgingival calculus and just cleaning supragingival puts the patients at risk. Thank you for taking a moment to read this. I hope this does not pass.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:20 PM
To: Rebekah Vanleer
Subject: Fw: Opposing agenda item 6.a.v and supporting 6.a.iv

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:55 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing agenda item 6.a.v and supporting 6.a.iv

From: GiancarloA <giancarloarreguin@gmail.com>
Sent: Monday, March 23, 2026 7:40 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing agenda item 6.a.v and supporting 6.a.iv

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Nevada State Board of Dental Examiners,

I am writing this to formally oppose the proposal to permit unlicensed dental assistants to perform supragingival scaling in Nevada.

As a licensed dental hygienist, I am deeply concerned that this change would weaken the educational and clinical standards that are currently required to provide safe dental care to the public. Dental hygienists complete CODA-accredited programs that include extensive coursework in anatomy, periodontology, radiology, infection control, and clinical instrumentation, followed by competency examinations before being licensed to treat patients. These requirements are in place for a reason — scaling procedures require proper training, clinical judgment, and the ability to recognize disease.

Removing these standards and allowing individuals without accredited education to perform scaling puts patients at risk for improper treatment, missed diagnoses, and potential harm to both hard and soft tissues. Even when limited to supragingival scaling, the procedure still requires the knowledge and skill to identify periodontal conditions that may not be obvious without proper training.

Lowering the standard of care does not solve access-to-care issues and should not come at the expense

of patient safety. Nevada residents deserve to receive treatment from qualified, licensed professionals who have met established educational and clinical requirements.

I respectfully urge the Board to reject this proposal and to continue protecting the public by maintaining the current standards for dental hygiene practice in Nevada.

Respectfully,
Giancarlo Armando Arreguin
Registered Dental Hygienist – Nevada

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:09 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to agenda item 6.a.v Expanding Dental Assistant Scope to Include supragingival Scaling Procedures

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:20 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to agenda item 6.a.v Expanding Dental Assistant Scope to Include supragingival Scaling Procedures

-----Original Message-----

From: Gina Bryer <ginabryer808@gmail.com>
Sent: Sunday, March 22, 2026 10:11 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to agenda item 6.a.v Expanding Dental Assistant Scope to Include supragingival Scaling Procedures

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

>
> Dear Members of the Nevada State Board of Dental Examiners,
>
> I am writing to express my strong opposition to agenda item 6.a.v that would allow dental assistants to perform supragingival scaling procedures on patients.
>
> Dental scaling is not a routine or purely mechanical task—it is a clinical procedure that requires the ability to assess periodontal health, recognize disease progression, and respond appropriately to complications. Licensed dental hygienists receive extensive education and clinical training in areas such as periodontal assessment, instrumentation techniques, infection control, and patient safety. This level of preparation is essential to ensure that patients receive safe, effective, and high-quality care.
>
> Expanding the scope of dental assistants to include scaling raises significant concerns regarding patient safety and quality of care. Without the depth of training required of licensed hygienists, there is an increased risk of incomplete calculus removal, damage to soft tissues, and failure to identify underlying periodontal disease or other oral health conditions. These risks could ultimately lead to delayed diagnosis, progression of disease, and

increased long-term healthcare costs.

>

> Additionally, such a change could create confusion among patients regarding provider qualifications and undermine the established standards of care within the dental profession. Patients deserve to know that the individual performing their clinical procedures has the appropriate licensure and training.

>

> While I fully support the important role dental assistants play in improving efficiency and access to care, expanding their duties to include scaling is not an appropriate or safe solution. Efforts to address access to care should instead focus on increasing the dental hygiene workforce, supporting education, and utilizing licensed professionals to the full extent of their training.

>

> I respectfully urge the Board to prioritize patient safety and maintain the current standards of care by keeping scaling procedures within the scope of licensed dental hygienists and dentists.

>

> Thank you for your time and consideration.

>

> Sincerely,

> Gina Capitanio, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:26 PM
To: Rebekah Vanleer
Subject: Fw: Letter of Opposition

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:52 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Letter of Opposition

From: Gloria Silva <gsilvardh@gmail.com>
Sent: Monday, March 23, 2026 6:28 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Letter of Opposition

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Gloria Silva and I am a concerned registered dental hygienist residing in Las Vegas, Nevada. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v. Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Gloria Silva, BSRH, RDH

(702) 236-0496

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:46 PM
To: Rebekah Vanleer
Subject: Fw: Agenda Item 6.a.v Public Health Concerns Regarding Scope Expansion for Dental Assistants

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:37 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda Item 6.a.v Public Health Concerns Regarding Scope Expansion for Dental Assistants

-----Original Message-----

From: Hannah Lee <hannah.lee.87@gmail.com>
Sent: Monday, March 23, 2026 9:53 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda Item 6.a.v Public Health Concerns Regarding Scope Expansion for Dental Assistants

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to respectfully express concern regarding the proposal to allow unlicensed and under-trained dental assistants to perform supragingival scaling. While I deeply value the important role dental assistants play in supporting patient care, this proposed change raises significant concerns related to public health, patient safety, and the overall quality of care.

Supragingival scaling is not merely a technical procedure, it requires clinical judgment, the ability to assess oral and systemic health conditions, identify signs of disease, and respond appropriately to patient needs. Dental hygienists complete extensive education and clinical training to safely and effectively perform these services. Expanding this responsibility to individuals without equivalent preparation introduces avoidable risks, including missed diagnoses, improper treatment, and potential long-term consequences for patients.

Rather than lowering the standard of care, I encourage the Board to consider sustainable, patient-centered solutions that address access to care while maintaining safety and quality. There are several viable alternative pathways:

1. Approving the dental and dental hygiene compact would allow licensed hygienists to more easily relocate to Nevada, helping to alleviate workforce shortages without compromising care standards.

2. Increasing funding for existing dental hygiene programs to expand clinical capacity and allow more students to graduate each year, strengthening the pipeline of qualified providers.
3. Supporting and training dental offices to implement the assisted dental hygiene model would improve efficiency while ensuring care remains within the appropriate scope of trained professionals.
4. Eliminating supervision requirements for dental hygienists would enable them to provide essential healthcare services in underserved and rural communities where access to a dentist is limited.

These approaches prioritize both access and patient safety, ensuring that Nevadans continue to receive high-quality care from appropriately trained professionals.

I respectfully urge the Board to carefully consider the potential risks associated with this proposal and to instead invest in strategies that uphold the integrity of the profession and protect the health of the public.

Thank you for your time and thoughtful consideration.

Sincerely,
Hannah Lee, BS, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:52 PM
To: Rebekah Vanleer
Subject: Fw: Public Comment on Agenda Items 6.a.iv and 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:29 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Cc: Andrea Barraclough <abarraclough@dental.nv.gov>
Subject: FW: Public Comment on Agenda Items 6.a.iv and 6.a.v

From: Hannah Luna <hlouluna@gmail.com>
Sent: Tuesday, March 24, 2026 10:52 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Public Comment on Agenda Items 6.a.iv and 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Hannah and I am a dental hygiene student in Nevada. I am writing to provide public comment on the upcoming agenda items.

I would like to express my strong support for Agenda Item 6.a.iv. This item helps uphold the standards of care within dentistry and prioritizes patient safety, which is essential to our profession.

I also respectfully but strongly oppose Agenda Item 6.a.v regarding allowing unlicensed or under-trained dental assistants to perform scaling procedures. As a dental hygiene student, I have undergone extensive education and clinical training to safely and effectively perform scaling. This procedure is not simply removing buildup, but requires knowledge of anatomy, disease processes, instrumentation, and patient management to avoid causing harm.

Allowing individuals without proper licensure and training to perform scaling puts patients at risk for injury, incomplete treatment, and mismanagement of periodontal disease. It also undermines the education and clinical standards that dental hygienists are required to meet.

Patient safety should always come first. Scaling should remain within the scope of properly trained and licensed dental professionals.

Thank you for your time and consideration.

Sincerely,
Hannah Luna

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:11 PM
To: Rebekah Vanleer
Subject: Fw: Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:19 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda Item 6.a.v

From: Heather Benson <lvflosser@cox.net>
Sent: Sunday, March 22, 2026 9:31 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Nevada State Board of Dental Examiners,

I am writing in opposition to Agenda Item 6.a.v, which proposes allowing dental assistants to perform supragingival scaling.

As a Nevada RDH for the past 28+ years, I have significant concerns regarding patient safety, quality of care, and the overall standard of clinical practice if this change is implemented. Supragingival scaling is not simply a mechanical task—it requires clinical judgement, and understanding of periodontal health, and the ability to recognize underlying disease processes. Even what appears to be “above the gumline” can quickly involve areas where improper technique may cause harm or overlook early signs of periodontal disease.

Registered dental hygienists receive extensive education and clinical training specifically in periodontal assessment, instrumentation, and patient management. This training ensures not only the safe removal of deposits but also the identification of conditions that require further diagnosis or treatment. Expanding the scope of practice to dental assistants—who do not receive the same depth of education in these areas—risks lowering the standard of care and can lead to missed diagnoses or improper treatment. Really ask yourself if you would be willing to put yourself or your family members in the

hands of a less skilled, less trained, and less educated assistant for your dental hygiene needs for the foreseeable future. I would dare venture that you would prefer to be treated by a registered dental hygienist with extensive education and clinical training.

Additionally, this change may create confusion for patients regarding provider roles and qualifications potentially undermining trust in dental care. Patients deserve clarity about who is providing their treatment and assurance that those individuals are appropriately trained and licensed for those procedures. Should this Agenda Item progress, at the very least, it should require the patient to be informed of the credentials of the provider at every single appointment.

While I understand the desire to improve efficiency and access to care, these goals should not come at the expense of patient safety or the integrity of the dental profession. This is not the answer. It is my understanding that a dentist or dental hygienist would be required to check patients before and after the assistant scales. Neither the dentist nor hygienists have time for this added procedure. It would lower the care and attention that is required while treating a patient. I refuse to be pulled in too many directions while I am treating patients, because optimal patient treatment and care is what I strive to provide for every single one of my patients.

For these reasons, I respectfully urge the Board to reject Agenda Item 6.a.v.

Thank you for your time and consideration.

Sincerely,
Heather Benson, RDH
Las Vegas, NV

To the Nevada State Board of Dental Examiners,

I am writing to express my strong opposition to the proposal that would allow unlicensed dental assistants to perform supragingival scaling in the state of Nevada.

As a licensed dental hygienist practicing in Nevada, I completed a CODA-accredited dental hygiene program that required extensive didactic education, clinical training, and competency examinations before I was permitted to perform scaling on patients. These requirements exist to protect the public. It requires knowledge of anatomy, periodontal disease, instrumentation, infection control, and the ability to recognize conditions that may require referral or further treatment. Periodontal disease is not something to take lightly as it has been linked to overall systemic health such as diabetes, cardiovascular disease, and other serious conditions. This is considered a medical risk that needs to be assessed and recognized by licensed professionals. It can include missed diagnoses, improper treatment, and harm to patients.

Allowing individuals without this level of education and licensure to perform scaling lowers the standard of care and puts patients at unnecessary risk. Supragingival calculus removal requires proper training to avoid damage to enamel, restorations, and soft tissue, as well as the ability to identify underlying periodontal disease that may not be immediately visible.

Expanding clinical duties to unlicensed personnel does not improve access to care if it compromises patient safety and quality. The board should instead focus on supporting accredited dental hygiene programs and expanding registered dental hygienist's autonomy. Increasing access to care by utilizing and fully supporting licensed professionals would protect the public while addressing the workforce.

Nevada patients deserve to be treated by properly educated and licensed professionals. I strongly urge the Board to reject this proposal and to continue upholding the educational and licensing standards that protect the public.

Respectfully,

Italia Bracamontes., RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:50 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:36 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Jaclyn Oswald
Sent: Monday, March 23, 2026 9:20 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I'm saddened to know we are facing this issue yet again. The value of the dental hygiene profession is being diminished again by proposing such a thoughtless proposition. As a RDH, we took an oath to provide standard of care to every one of our patients, to do no harm, to continue our education in order to offer the best quality of care we can provide... and this agenda will blindside patients and put them in harms way. I am 100% against agenda item 6.a.v and oppose it. Please do not allow this to go through. I work hard every day I am at work. My patients appreciate my thoroughness. Quality of care matters to patients and ultimately to help prevention of oral health disease. If this goes through, there will not only be a decline in oral health but also in systemic health. Please do not allow this to pass.

Regarding agenda 6.a.iv, I am in support of. This will allow more access to care for the population.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Jaclyn Oswald
7288 Afternoon St
Las Vegas, NV 89131
jjoswald2@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:31 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:49 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Jacqueline Cerna
Sent: Monday, March 23, 2026 4:09 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Jacqueline Cerna
5462 Olympic Spirit Ln
Las Vegas, NV 89113
jackiecerna12@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:27 PM
To: Rebekah Vanleer
Subject: Fw: Opposing agenda item 6.a.v.

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:51 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing agenda item 6.a.v.

From: Jada White <jadagirl2496@gmail.com>
Sent: Monday, March 23, 2026 5:54 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing agenda item 6.a.v.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom this may concern,
I am writing you to oppose agenda item 6.a.v. This law passing will comprise the quality of care to patients. Dental hygiene schools teach proper technique and care for the patients. As well as depth within the curriculum. Dental hygienist should have a degree to ensure patient safety. Dental hygienists also provide education to their patients which school specifically teaches.

Jada

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 3:01 PM
To: Rebekah Vanleer
Subject: Fw: Opposing 6 a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:24 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing 6 a.v

From: Jamee Eggett <jjeggett@gmail.com>
Sent: Tuesday, March 24, 2026 6:51 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing 6 a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello, my name is Jamee Eggett and I'm a Dental Hygienist in the state of Nevada and Utah. I oppose this change. Something similar to this has tried to be passed multiple times without success.

As a clinician and as a patient, I would want my teeth cleaned by someone who has spent the time and put in the practice hours to receive their license and credentialing, so that when I'm getting a preventive cleaning, I know I'm not being set up for disease in a few years. There is much more that goes into scaling than what can be shown by just looking over someone's shoulder and watching to learn.

I do agree that something needs to be done, but I do not believe this is the solution.

Sincerely,

Jamee Eggett, RDH, BS

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:29 AM
To: Rebekah Vanleer
Subject: Fw: NSBDE agenda item 6.a.v (opposition letter)

Follow Up Flag: Follow up
Flag Status: Completed

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Tuko <tuko2ko@sbcglobal.net>
Sent: Monday, March 23, 2026 1:15 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: NSBDE agenda item 6.a.v (opposition letter)

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

James J McKernan
1301 Granite Dr
Reno, Nv. 89509
Tuko2ko@sbcglobal.net

March 23, 2026

Nevada State Board of Dental Examiners
2651 N Green Valley Pkwy #104
Henderson, Nv. 89014

nsbde@dental.nv.gov

Dear Members of the Board,

I am writing to express my strong opposition to the proposed agenda item 6.a.v permitting dental assistants to perform supragingival scaling after a limited period of training.

By way of background, I have practiced as a dental hygienist in the state of Nevada for 46 years and had the honor of serving on the Nevada State Board of Dental Examiners for nine years. My

perspective is grounded in both extensive clinical experience and regulatory oversight, with a primary commitment to maintaining the highest standards of patient care and safety.

The disparity in education and clinical preparation between licensed dental hygienists and dental assistants is substantial and concerning. Dental hygienists typically complete approximately 2,900 hours of rigorous academic and clinical training to develop the knowledge and technical proficiency required to safely and effectively perform scaling procedures. In contrast, the proposal would allow dental assistants to perform supragingival scaling with only approximately 200 hours of training. This significant gap raises serious concerns regarding competency, patient safety, and quality of care.

While the proposal is limited to supragingival scaling, it is important to emphasize that the most clinically significant aspect of periodontal therapy is subgingival scaling. Subgingival instrumentation is essential for the removal of bacteria, biofilm, calculus, and endotoxins beneath the gumline—factors directly associated with the prevention and management of periodontal disease. Supragingival scaling alone is largely cosmetic in nature and does not adequately address the underlying causes of periodontal pathology.

Allowing individuals with limited training to perform even supragingival procedures risks creating a false sense of treatment completeness for patients, potentially delaying necessary periodontal care. It may also increase the likelihood of improper technique, incomplete calculus removal, or unintended harm to the dentition and surrounding tissues.

The protection of the public has always been the central mission of the Board. In my professional opinion, this proposal does not align with that mission. Maintaining high standards for education, licensure, and scope of practice is essential to ensuring safe, effective, and evidence-based patient care.

I respectfully urge the Board to reconsider this proposal and to continue upholding the rigorous standards that have long protected the oral health of Nevada residents.

Thank you for your time and consideration.

**Sincerely,
James J McKernan RDH
Nv License #1079**

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:28 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6.a.v.

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:51 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose 6.a.v.

-----Original Message-----

From: Jamie Urtiaga <jamieurtiaga@gmail.com>
Sent: Monday, March 23, 2026 5:44 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>; Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6.a.v.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am a RDH and I oppose this change allowing DA to scale

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:49 AM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:35 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

-----Original Message-----

From: Jan Briones <briones.jandanica@gmail.com>
Sent: Monday, March 23, 2026 7:59 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Jan Danica Briones and I am a concerned patient, Nevada resident, and hygiene student residing in Las Vegas, NV 89141. I am writing to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect

patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Jan Danica Briones
702-682-2223

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:24 PM
To: Rebekah Vanleer
Subject: Fw: Oppose-agenda item 6.A.V

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:54 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose-agenda item 6.A.V

From: jana sak <sakjana9@gmail.com>
Sent: Monday, March 23, 2026 7:04 PM
To: NSBDE@nv.dental.gov; Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Re: Oppose-agenda item 6.A.V

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

On Mon, Mar 23, 2026 at 6:58 PM jana sak <sakjana9@gmail.com> wrote:

I am a Dental Hygienist with over 30 years of experience. This situation is absurd. The legislation already failed, and now they're attempting to be secretive. By they, I mean the Dental Board that governs us, which is unbelievable. This is a scam, and only the dentists seem to prioritize their own interests and profits. There is no shortage of dental hygienists; there's a shortage of ethical dentists. What they're doing is unethical and could endanger the public. That's why we need our own board, and dental hygienists should be able to practice independently and refer patients to dentists. This has gone on far too long, and the Nevada Dental Board's attempt to push this through is very underhanded. Please protect the public and preserve the integrity of the dental hygiene profession, which is a specialized field. Not everyone can do it—requiring education, A bachelors degree and 30 hours of continuing education every two years, CPR certification, and infection control training, which is very important. The Dental board is just trying to get away with being able to certify just anybody off the streets So they can make a profit what really needs to be looked at his insurance companies and the standard of pay that hasn't changed in over 30 years.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:21 PM
To: Rebekah Vanleer
Subject: Fw: oppose agenda item 6 a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:54 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: oppose agenda item 6 a.v

From: jana sak <sakjana9@gmail.com>
Sent: Monday, March 23, 2026 7:17 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: oppose agenda item 6 a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please oppose agenda item 6AV. This is a sneaky attempt by the Nevada dental board to allow substandard care for Nevada citizens. This is just another underhanded attempt. It was not passed through legislation, and now they're trying to sneak it in very covertly, which only puts the public at risk. Most dental hygienists have a bachelor's degree, and we need 30 hours of continuing education every two years, with four hours dedicated to infection control. We also need to be CPR certified. What really needs to happen is that dental hygienists should have their own profession and definitely their own licensing board because this is what the board is doing to us. We pay them every two years to keep our license and ensure a standard of care, and now they are trying to let anyone off the street do our job. That's what it comes down to — it's a profession, and not just anyone can do this. We are professionals. Please oppose this and help maintain high standards here in Nevada by only allowing registered dental hygienists to perform continuing care. Bypassing this would put our Nevada citizens at risk.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:47 AM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:35 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Janet Crosswhite
Sent: Monday, March 23, 2026 8:03 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

As a PHEDH, I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling. I see first hand of how an unlicensed qualified dental professional could potentially cause harm to a patient and or contribute to advance periodontal health issues.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines

these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Janet Crosswhite
7260 W Azure Dr Ste 140-14
Las Vegas, NV 89130
heavenlysmilesmobiledental@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:25 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:53 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Janice Raviz
Sent: Monday, March 23, 2026 6:33 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

In no way does agenda 6.a.v have the patients' best interest in mind. This is enabling subpar standard of care and, not to mention, is an insult to the RDHs that have invested a minimum of two years at an accredited dental hygiene program to achieve the skills and licensure to be able to provide proper dental care to the community.

This policy is a "band aid" to the root of the problem which is the need for insurance reform and supporting the states dental hygiene programs to be able to turn over more hygienists to alleviate the shortage.

For those who are lobbying for this policy, truly ask yourself if you would accept a subpar cleaning while sitting in the dental chair or if you would put your family in that position as well.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Janice Raviz
7816 Silver Mallard Ave
Las Vegas, NV 89131
ravizj@yahoo.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 3:02 PM
To: Rebekah Vanleer
Subject: Fw: Opposition 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:23 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition 6.a.v

From: Jennifer Gabara <jennifergabara@gmail.com>
Sent: Tuesday, March 24, 2026 4:48 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Fwd: Opposition 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

I am writing to formally oppose 6.a.v. This is not the answer the hygiene shortage. This will not increase access to care - it will only increase substandard care leading to worse health outcomes long-term.

Clinicians without proper training risk increasing infections, undiagnosed caries, periodontal disease, as well as cancers of the head and neck.

Dental hygiene saves lives through prevention which only occurs through adequate training and board examinations.

Thank you,
Jennifer Gabara

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:45 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:37 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Jennifer Mantonona
Sent: Monday, March 23, 2026 10:09 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Jennifer Mantanona
9303 Gilcrease Ave Unit 1004
Las Vegas, NV 89149
j.mantanona09@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:31 PM
To: Rebekah Vanleer
Subject: Fw: Comment on legislation

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:36 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Comment on legislation

-----Original Message-----

From: Jennifer Mason <jenniferdhygiene@gmail.com>
Sent: Saturday, March 21, 2026 9:54 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Comment on legislation

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

NSDBE,

I would like to make a comment on a proposed agenda item.

I OPPOSE agenda item 6.a.v.

Dental assistants do not hold the proper training and education to scale teeth even if it's only supragingival. Supragingival only scaling does not give patients thorough and adequate care. If passed, this will cause neglect to patients over the long term. Will patients get to pay less money for an "easier" cleaning? How will these supragingival cleanings be coded for insurance claims? There is no current dental code for an above the gum line only cleaning.

There is a lot more to this than just allowing assistants to clean without any proper steps taken.

Thank you for your time.

Jennifer Mason, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:08 PM
To: Rebekah Vanleer
Subject: Fw: Support of Agenda item 6.a.iv

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 1:05 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Support of Agenda item 6.a.iv

From: Jessica Allen <jesallen1282@gmail.com>
Sent: Tuesday, March 24, 2026 12:23 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Support of Agenda item 6.a.iv

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am writing in support of agenda item 6.a.iv

Expand the scope of practice for licensed dental hygienists.

Increase public access to care by decreasing barriers.

Elevate the standard of care.

Give Dental Hygienists the autonomy they have earned.

We do more than clean teeth, we save lives.

Sincerely
Jessica Allen RDH
Licensed in OR and AK

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:16 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 1:05 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda item 6.a.v

From: Jessica Allen <jesallen1282@gmail.com>
Sent: Monday, March 23, 2026 11:56 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am writing to oppose Agenda item 6.a.v.

I am licensed dental hygienist in Alaska and Oregon. I have worked in public health, oral surgery, and private practice. I oppose Agenda item 6.a.v because it will not improve health outcomes in Nevada. By decreasing the education and practical hours required to scale teeth it puts the public at risk, decreases the trust in oral health professionals and actually limits access to comprehensive oral health care. You may think this a way to solve a present staffing shortage but passing this only puts public health at risk.

Thank you.

Jessica Allen RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:53 PM
To: Rebekah Vanleer
Subject: Fw: 6.a.iv support

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:28 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: 6.a.iv support

From: Jessica Wilson <adkolson@gmail.com>
Sent: Tuesday, March 24, 2026 10:13 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: 6.a.iv support

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

I am writing in support of the proposed expansion allowing licensed dental hygienists to practice within their scope without direct supervision of a dentist.

This change reflects the education, training, and clinical competency of dental hygienists as licensed healthcare professionals. Under Nevada Revised Statutes Chapter 631, dental hygienists are already held to rigorous standards, including formal education, clinical training, and successful completion of national and regional examinations. Allowing hygienists to practice within their established scope without direct supervision is a logical and appropriate evolution of that framework.

Expanding hygienist autonomy will improve access to preventive oral healthcare, particularly for underserved and rural populations. Preventive services such as assessments, prophylaxis, and patient education are critical to overall health and can be delivered safely and effectively by licensed hygienists without requiring the physical presence of a dentist.

This proposal also aligns with broader healthcare trends that utilize licensed professionals to the full extent of their training in order to improve efficiency, reduce barriers to care, and better serve patients. Importantly, this expansion maintains the integrity of the existing licensing structure. Unlike proposals that shift clinical procedures to unlicensed or minimally trained personnel, this change relies on qualified, regulated providers who are already accountable to the Board and bound by professional standards of care.

Allowing hygienists to practice without direct supervision does not eliminate collaboration with dentists, but rather enables more flexible models of care while maintaining appropriate referral and oversight when needed.

For these reasons, I respectfully support the proposed expansion and encourage the Board to move forward with its adoption.

Thank you for your consideration.

Jessica Wilson RDH

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:53 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:28 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to 6.a.v

From: Jessica Wilson <adkolson@gmail.com>
Sent: Tuesday, March 24, 2026 10:17 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

I am submitting this comment in opposition to the proposed regulation expanding the scope of dental assistants or Expanded Function Dental Assistants (EFDAs) to include supragingival scaling.

While I understand this proposal is being considered within the framework of the Expanded Function Dental Assistant provisions established under Nevada Revised Statutes Chapter 631, this change raises significant legal, structural, and patient safety concerns.

Scaling, including supragingival scaling, is a core component of dental hygiene practice as defined within Nevada's statutory licensing framework. It is not merely a mechanical task, but a clinical procedure involving the removal of calculus and integration into a broader assessment of oral health. Allowing this function to be performed by assistants, even under an EFDA designation, risks undermining the statutory purpose of dental hygiene licensure and blurring the distinction between licensed clinicians and auxiliary personnel.

Additionally, this proposal appears to expand EFDA duties beyond what was clearly contemplated by the Legislature. This issue has been presented in various forms and not adopted legislatively. Moving forward through regulation raises concerns regarding administrative overreach and circumvention of legislative intent.

There are also significant liability concerns. Dental hygienists should not be placed in a position where they are expected, either formally or informally, to evaluate, check, or assume responsibility for

procedures performed by assistants or EFDAs. Doing so creates ambiguity in the standard of care and exposes hygienists to professional liability for work they did not perform and may not have supervised. Responsibility for delegated procedures must remain clearly with the supervising dentist.

From a patient protection standpoint, transparency is essential. Patients should be clearly informed when a procedure is being performed by an assistant or EFDA rather than a licensed dental hygienist. This disclosure should be explicit and standardized to avoid confusion and ensure informed consent. Finally, if the Board proceeds with expanding EFDA duties, strict supervision limits must be established. Allowing a dentist to oversee multiple assistants performing clinical procedures such as scaling raises serious concerns regarding adequate supervision, patient safety, and quality of care. Clear and conservative ratios should be implemented to ensure that supervision is meaningful and not merely nominal.

At present, the EFDA educational and licensing framework is not yet fully operational. Expanding clinical duties prior to the establishment of standardized training, competency validation, and oversight mechanisms is premature and increases risk to patients and licensees alike.

Further, I understand that the board is trying to balance access to care and patient safety. Patient safety should be held in importance-above access to care. The spirit in which the board is meant to operate is to protect the public not dentists business interest. Restricting the endorsement for operation within underserved rural communities would help to serve those populations and balance access to care where it is most desperately felt.

For these reasons, I respectfully urge the Board to reject or significantly reconsider this proposed expansion unless and until there is clear statutory authority, established education and competency standards, and appropriate safeguards to protect both patients and licensed professionals.

Thank you for your consideration.

Jessica Wilson

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:54 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:28 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to 6.a.v

From: Jessica Wilson <adkolson@gmail.com>
Sent: Tuesday, March 24, 2026 10:11 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

I am submitting this comment in opposition to the proposed regulation expanding the scope of dental assistants or Expanded Function Dental Assistants (EFDAs) to include supragingival scaling.

While I understand this proposal is being considered within the framework of the Expanded Function Dental Assistant provisions established under Nevada Revised Statutes Chapter 631, this change raises significant legal, structural, and patient safety concerns.

Scaling, including supragingival scaling, is a core component of dental hygiene practice as defined within Nevada's statutory licensing framework. It is not merely a mechanical task, but a clinical procedure involving the removal of calculus and integration into a broader assessment of oral health. Allowing this function to be performed by assistants, even under an EFDA designation, risks undermining the statutory purpose of dental hygiene licensure and blurring the distinction between licensed clinicians and auxiliary personnel.

Additionally, this proposal appears to expand EFDA duties beyond what was clearly contemplated by the Legislature. This issue has been presented in various forms and not adopted legislatively. Moving forward through regulation raises concerns regarding administrative overreach and circumvention of legislative intent.

There are also significant liability concerns. Dental hygienists should not be placed in a position where they are expected, either formally or informally, to evaluate, check, or assume responsibility for

procedures performed by assistants or EFDAAs. Doing so creates ambiguity in the standard of care and exposes hygienists to professional liability for work they did not perform and may not have supervised. Responsibility for delegated procedures must remain clearly with the supervising dentist.

From a patient protection standpoint, transparency is essential. Patients should be clearly informed when a procedure is being performed by an assistant or EFDA rather than a licensed dental hygienist. This disclosure should be explicit and standardized to avoid confusion and ensure informed consent. Finally, if the Board proceeds with expanding EFDA duties, strict supervision limits must be established. Allowing a dentist to oversee multiple assistants performing clinical procedures such as scaling raises serious concerns regarding adequate supervision, patient safety, and quality of care. Clear and conservative ratios should be implemented to ensure that supervision is meaningful and not merely nominal.

At present, the EFDA educational and licensing framework is not yet fully operational. Expanding clinical duties prior to the establishment of standardized training, competency validation, and oversight mechanisms is premature and increases risk to patients and licensees alike.

Further, I understand that the board is trying to balance access to care and patient safety. Patient safety should be held in importance-above access to care. The spirit in which the board is meant to operate is to protect the public not dentists business interest. Restricting the endorsement for operation within underserved rural communities would help to serve those populations and balance access to care where it is most desperately felt.

For these reasons, I respectfully urge the Board to reject or significantly reconsider this proposed expansion unless and until there is clear statutory authority, established education and competency standards, and appropriate safeguards to protect both patients and licensed professionals.

Thank you for your consideration.

Jill Doyle, Retired Registered Dental Hygienist
Post Office Box 2404
Minden, NV 89423
March 23, 2026

Subject: Written comment regarding AGENDA ITEMS 6 a. iv. and v. (NSBDE Meeting on March 25, 2026)

To: The Nevada State Board of Dental Examiners and their Staff

I practiced dental hygiene for almost forty years in both Southern and Northern Nevada. During this time, I practiced in over a dozen dental offices and this experience gives me a unique perspective from which to weigh in on these issues.

The proposed action to direct staff to develop revised rules for future Board action largely eliminating formal education and licensure standards through an “assistant permit program” puts patients at risk. It is regressive and short sighted. This is a thinly veiled plan to reduce a dental practice’s overhead by substantially supplanting licensed dental hygienists with undertrained staff, who in reality, will not be adequately monitored by either the dentist or the hygienist given the realities of dental practice schedules. Nevada finds itself, many times, at the “bottom of various life quality lists,” we do not need to add to this problem by reducing practice standards for dental hygiene specifically and for good oral health care more generally.

In my experience, dental practices that treat their dental hygienists in a professional manner, do not have trouble finding hygienists to work in their practice. Dentists who complain about the compensation licensed hygienists can receive usually are the offices that have trouble attracting and retaining quality dental hygiene candidates. This “concern” for patient care, wrapped in the perception there is a shortage of hygienists, is a financial decision without adequate due regard to the adequacy of patient care.

A true story about one of my classmates in my dental hygiene program half a century ago makes this point. My classmate had been in the Air Force and worked as a “Dental Hygienist.” She had been trained in a program like that the Dental Board is considering to direct the Staff to develop, 200 hours of training. My classmate was very resentful, that after being a “practicing Dental Hygienist” for years in the USAF, she should have to receive and complete an additional 2,000 plus hours of education and clinical experience to allow her to sit for the state and national board examinations. When we graduated, I asked her what her thoughts were on the requirements for licensing dental hygienists and she said, “I didn’t know what I didn’t know.”

The proposed rule development direction to Staff seeks rulemaking text that the assistant can receive can receive a temporary permit upon completion of 200 hours of training. The hallmark of the current regulatory framework is the hygienist receives licensure from the Board after (1) successful completion of a degreed, state-approved educational program that entails well over 2,000 hours of education and clinical practice, and (2) successful completion of a Board approved examination. The current framework protects the efficacy and quality of patient care through the involvement of a number of *independent* entities each ensuring that all licensees are suitably trained and adequately experienced to provide this type of patient care. The proposed rule development request largely eviscerates this proven, patient protective framework.

There are constructive ways to deal with the topics the proposed rule development request seeks to address, they include actions like:

1. Approve the dental and dental hygiene compact. (This would allow hygienists to move to Nevada with fewer obstacles.)
2. Campaign to increase funding to our existing dental hygiene programs.

Both of these recommendations properly address perceived shortages in numbers of properly trained dental hygienists on a sustainable, long-term basis without jeopardizing the quality of patient care. But the Board should give serious consideration to a third action, which is:

3. Eliminate current supervision regulations for dental hygienists and adopt substantial revisions to allow greater flexibility and independence of professional dental hygiene practice. This would allow dental hygienists to better provide oral healthcare services to underserved populations in Nevada, both metropolitan and rural. This is not novel, other states have done this with great success.

The assistant permit program concept (sometimes termed a “proctorship” or “professional mentor/mentee program”) has apparently been proposed in previous legislative sessions and has not been passed by that branch of government. Do not engage in a “race to the bottom” respecting oral health care through administrative rulemaking on a topic the Legislature has already refused to consider. It would be prudent to consider rule restructure of dental hygienist supervision requirements to allow present and future dental hygienists to practice most effectively throughout the state and alleviate some of our State’s underserved patient needs.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:05 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:30 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Jobelle Quick
Sent: Sunday, March 22, 2026 11:24 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

Prevention of disease is out the window once unregistered dental assistants are allowed to do superficial “dental cleanings”. Dentists will not have the time to check their work for “thoroughness”. Majority of patients have periodontal disease of different stages, so most patients require and deserve subgingival scaling for treatment even for maintenance visits. The continued push for assistants to scale is not the answer. On the other hand, allowing registered dental hygienists more autonomy is the start of increased access to dental care for the public.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards

and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Jobelle Quick
265 Newelton Ct
Henderson, NV 89074
jobelle.dhyg@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:57 AM
To: Rebekah Vanleer
Subject: Fw: Opposing to 25 MARCH 2026 Agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:33 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing to 25 MARCH 2026 Agenda item 6.a.v

From: Joseph Wineman <jwineman@roseman.edu>
Sent: Monday, March 23, 2026 7:45 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing to 25 MARCH 2026 Agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada Board of Dental Examiners,

As a practicing dentist in Nevada, I am writing to formally **OPPOSE** the proposed creation of a temporary supragingival scaling special endorsement for dental assistants (TSSSEDA) **Agenda Item 6.a.v**. While the initiative proposes to expand access to dental care, I believe the endorsement may lead to compromised patient outcomes, more wait times, increased professional time to supervise and possibly introduce the potential for insurance fraud.

Key Concerns:

1. Training Scope & Practical Application

Starting with a dental assistant who has worked in the profession for 5-7 years depending on the length of service with current employer at least presents a candidate who knows the profession. However, dental assisting is much different than dental hygiene. The suggested 200-**hour** training program (only 5 weeks in duration) includes critical components such as infection control, dental plaque and calculus formation, instrumentation, patient assessment, and lab experience with mechanical and ultrasonic devices. Although these course topics are foundational, the temporary endorsement may allow assistants to perform supragingival scaling without the full breadth of training (RDHs have 200 **weeks** of training) or experience required for a licensed dental hygienist.

2. Patient Safety and Procedural Consistency

Even after completing 200 training hours and observing 50 supragingival cleanings by a licensed hygienist, dental assistants may lack the clinical judgment for unexpected issues like medication interaction, bleeding gums, patient anxiety, or equipment failure. This can cause inconsistent treatment quality and potential patient harm.

3. Dentist Oversight and Accountability

The endorsement requires supervising dentists or dental hygienists to evaluate patients both before and after supragingival scaling. This process may lead to scheduling delays since a dental professional must complete the treatment appointment and verify the accuracy of the procedure. Dental assistants in this new category are not allowed to operate independently.

4. Cost vs. Quality Trade-Off

The endorsement will **NOT** reduce costs for patients and decreased training and lack of real oversight could lead to diminished quality of care. As a result, patients may not receive a thorough dental prophylaxis (removal of supragingival calculus) potentially decreasing long-term oral health benefits and increasing the risk of complications.

Recommendation:

While the 200-hour training and 50 patient observation requirements provide some foundation, they do not match the comprehensive education and clinical experience of licensed dental hygienists. I recommend the Board reject this proposal and require all CODA-accredited institutions in our state to either establish new RDH programs or expand current enrollment, faculty, and graduation rates. This approach will maintain our profession's high standards, ensure more RDHs join the workforce, and support patient safety and accountability.

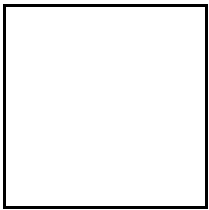
Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph A. Wineman, DMD". The signature is fluid and cursive, with a long horizontal line extending from the end.

Joseph A. Wineman DMD, ABGD; License Number 4291

Past President, Southern Nevada Dental Society
Past President, Nevada Dental Association
President, Nevada Academy of General Dentistry



**Joseph A. Wineman DMD MHA FICD
ABGD**

**Roseman University, CODM
Adjunct Faculty**

C: 702-326-9461 | P: 702-968-1652

Email: jwineman@roseman.edu
4 Sunset Way Bldg #4B, Henderson, NV 89014

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www.roseman.edu

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:19 PM
To: Rebekah Vanleer
Subject: Fw: Agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:56 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda item 6.a.v

From: Juliana Wence <juliana.wence@gmail.com>
Sent: Monday, March 23, 2026 7:49 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good evening,

It has come to my attention that the state is proposing that unlicensed personnel perform dental cleanings. In my time in the military, this is the method they used to train us dental assistants to perform dental prophylaxes. Watch a few, practice a few, and then be on your own. As a young airman, I had no idea what I was doing. I cannot tell you how many patients received unintentional gingivoplasties at the hands of mine and my peers' scaling instruments. In one instance, I was cleaning a colonel's teeth with a Cavitron and the tip went right through the soft enamel on his front tooth because I did not know the proper technique. We also caused numerous chipped fillings and soft tissue injuries. I can guarantee our patients did not receive adequate dental cleanings. We did not receive adequate training. They explained and demonstrated WHAT to do but knowing WHY is equally important... and we did not receive that. That is why dental hygienists require the education they have. Even if unlicensed personnel are not going subgingival, there is plenty of damage that can be done supragingivally. And without going subgingival, it is not an adequate cleaning. I personally would not want this type of "access to care". I would want it done right. This is unsafe and doing a disservice to patients who likely do not know better. This is a healthcare service that must be left to the professionals.

Thank you,

Juliana Wence

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:14 PM
To: Rebekah Vanleer
Subject: Fw: Opposing 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:17 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing 6.a.v

From: Justine Greenhalgh <justinesroe@gmail.com>
Sent: Sunday, March 22, 2026 9:14 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am a licensed dental hygienist in Nevada and I am in opposition of 6.a.v. The proposal to allow dental assistants to perform supragingival scaling raises serious concerns regarding patient health, as effective periodontal care requires complete subgingival calculus removal. This concept has already been presented to legislative sessions and rejected three times. This approach risks compromising patient outcomes in favor of substandard treatment. Additionally, claims of a dental hygienist shortage in Nevada may be exacerbated by this proposal, as it could discourage licensed hygienists from practicing in a state where their role is diminished. Requiring hygienists to supervise assistants performing these duties would also reduce efficiency, increase workload strain, and potentially contribute to burnout and higher attrition rates—further worsening workforce challenges. To more effectively address workforce concerns, alternative solutions should be considered. These include adopting the dental hygiene compact to ease interstate licensure, increasing funding for dental hygiene education programs to increase the number of graduates each year, and removing supervision requirements to improve access to care in underserved rural communities. Thank you for your time.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:53 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:59 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: Karen Egurrola <kare.egurrola@gmail.com>
Sent: Monday, March 23, 2026 9:07 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Karen Egurrola and I am a registered dental hygienist residing in Las Vegas. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v. Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care. Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions. Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model. Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,
Karen Egurrola
Kare.egurrola@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:59 AM
To: Rebekah Vanleer
Subject: Fw: Supporting 6a.iv

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:33 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Supporting 6a.iv

-----Original Message-----

From: Karen Lohmeyer <halobill@sbcglobal.net>
Sent: Monday, March 23, 2026 7:42 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Supporting 6a.iv

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Including the support of 6a.iv with previous letter sent on opposing 6.av Thank you for your consideration in this matter.

Karen Lohmeyer RDH BS
Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:17 PM
To: Rebekah Vanleer
Subject: Fw: Opposing Agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:12 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Opposing Agenda item 6.a.v

From: Karen Lohmeyer <halobill@sbcglobal.net>
Sent: Sunday, March 22, 2026 8:25 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing Agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am writing to you respectfully to oppose the proposed agenda item 6.a.v that would allow dental assistants to perform supragingival scaling with only 200 hours of training. While I appreciate efforts to improve access to care, this proposal raises serious concerns regarding patient safety and quality of treatment. Supragingival scaling, though it may appear routine, requires a thorough understanding of oral anatomy, disease processes, instrumentation, and the ability to recognize conditions that may require further clinical intervention. A limited training period does not adequately prepare individuals to perform these duties. Dental hygienists undergo extensive education and clinical training. Reducing these standards potentially can put patients at risk. I strongly urge you to consider this proposal and maintain the current standards that put patients first in maintaining their safety and the high quality of dental care they deserve.

Thank you for your time and consideration in this matter.

Karen Lohmeyer RDH BS

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:12 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:19 AM
To: Arielle Cymerman <acymerman@dental.nv.gov>; Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Karina Contreras
Sent: Sunday, March 22, 2026 9:21 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing as a licensed dental hygienist to express my strong opposition to the proposed change allowing dental assistants to perform supragingival scaling.

While I understand the intent may be to improve access to care, this proposal raises serious concerns regarding patient safety, ethical standards, and the overall quality of dental care delivery.

Scaling is not a simple or purely mechanical task, even if it's only supragingival. It requires comprehensive education in oral anatomy, periodontal disease progression, instrumentation techniques, and the ability to recognize clinical signs that may indicate underlying pathology. Dental hygienists undergo extensive training to safely and effectively perform these procedures, as well as to identify conditions that may require further evaluation or intervention. Allowing individuals without this level of education and clinical preparation to perform scaling increases the risk of incomplete care, missed diagnoses, and potential harm to patients.

I urge the Board to carefully consider the long-term implications of this proposal and to prioritize patient safety, ethical care, and professional standards. Thank you for your time

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration

that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Karina Contreras
3755 Thistledown Ct
Reno, NV 89512
karinagcontreras@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:13 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6a, V

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:18 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose 6a, V

From: Kasandra Roman <roman.kasandra@yahoo.com>
Sent: Sunday, March 22, 2026 9:18 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6a, V

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Thank you,
Kasandra Roman
[Sent from Yahoo Mail for iPhone](#)

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:27 PM
To: Rebekah Vanleer
Subject: Fw: Opposition of 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:51 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition of 6.a.v

From: Kayla Anglade <kay.anglade7@gmail.com>
Sent: Monday, March 23, 2026 5:58 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition of 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to express my strong opposition to Agenda Item 6a V, which proposes allowing dental assistants with approximately 200 hours of education to perform scaling procedures, including the use of hand scalers, ultrasonic devices, and air-polishing instruments.

While I understand the intent to address workforce shortages, this proposal raises serious concerns regarding patient safety and the overall standard of care. Scaling is a critical clinical procedure that requires extensive education, training, and clinical judgment to properly assess periodontal health, identify disease, and avoid causing harm to the patient. A limited training period of 200 hours is not sufficient to ensure competency in these areas.

Allowing undertrained individuals to perform such procedures risks misdiagnosis, incomplete treatment, tissue damage, and delayed identification of periodontal disease. This ultimately places the public at unnecessary risk and undermines the quality of care patients deserve.

Additionally, this proposal does not effectively solve workforce shortages. Instead, it shifts responsibility to less-qualified providers rather than investing in sustainable, long-term solutions such as supporting the education and recruitment of licensed dental hygienists and other highly trained professionals.

I respectfully urge the Board to prioritize patient safety and uphold the integrity of dental care standards by opposing this measure.

Thank you for your time and consideration.

Sincerely,

Kayla Anglade, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:43 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to March 25 agenda item 6 a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:32 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to March 25 agenda item 6 a.v

From: Kelly Taylor <kjtrdh@gmail.com>
Sent: Tuesday, March 24, 2026 12:08 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to March 25 agenda item 6 a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dentistry,

I am writing to express my firm opposition to Agenda Item 6.a.v, which would permit dental assistants to remove supra gingival calculus, plaque, and stain from exposed tooth surfaces using hand instruments, ultrasonic scalers, or air-polishing devices through a temporary special endorsement.

The Board's legal and ethical responsibility is to safeguard the public's health, safety, and welfare. Its role is not to accommodate practice efficiencies or workforce shortages if doing so compromises the standard of care. Every regulatory decision should be grounded in the principle of protecting patients above all else.

The procedures described in this proposal are clinical in nature and require a high level of education, training, and professional judgment. Licensed dental hygienists complete comprehensive, accredited programs that prepare them to assess oral conditions, recognize underlying disease, and perform instrumentation safely. A temporary endorsement for dental assistants does not provide equivalent preparation and cannot ensure the same level of competency.

Expanding these duties to dental assistants, even under supervision, creates unnecessary risk. Inadequate training may lead to improper technique, missed signs of disease, or damage to oral tissues. These are preventable outcomes that run counter to the Board's duty to minimize patient harm and uphold established standards within the profession.

In addition, this proposal may blur the distinction between licensed and unlicensed providers, leading to confusion for patients about who is qualified to perform specific procedures. Maintaining clear professional roles is essential to preserving public trust and confidence in dental care.

While improving access to care is an important goal, it should not be achieved by lowering clinical expectations or redefining scope of practice in a way that jeopardizes patient safety. More appropriate solutions include investing in the education, recruitment, and retention of licensed dental hygienists and supporting sustainable workforce development strategies.

Approving this agenda item would signal a shift away from prioritizing patient protection toward accommodating operational demands. Such a direction is inconsistent with the Board's core mission. For these reasons, I respectfully urge you to reject Agenda Item 6.a.v and to continue prioritizing the safety and well-being of Nevada's residents.

Thank you for your time and consideration.

Sincerely,

Kelly J Taylor, RDH

NV License 4380

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:45 AM
To: Rebekah Vanleer
Subject: Fw: Opposition to NAC 631.220, Item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:39 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to NAC 631.220, Item 6.a.v

From: Kerry Kuster <kkuster@tmcc.edu>
Sent: Monday, March 23, 2026 9:06 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to NAC 631.220, Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

President Dr. Ronald West, DMD, and Esteemed Members of the Nevada State Dental Board:
For the record, my name is Kerry Kuster, and I reside in Sparks, Nevada. I am a Registered Dental Hygienist and have been licensed in the state of Nevada for 31 years. I currently serve as a tenured professor in the Dental Hygiene Program at Truckee Meadows Community College (TMCC), where I have been an instructor for the past 10 years.

I write today in strong opposition to NAC 631.220, agenda item 6.a.v, which proposes allowing dental assistants with only 200 hours of education to perform dental scaling procedures. This proposal raises serious concerns regarding patient safety, quality of care, and the integrity of our profession. Permitting individuals who are unlicensed and insufficiently trained to perform such a critical clinical procedure will inevitably compromise patient outcomes and place the public at risk.

Eliminating or bypassing Commission on Dental Accreditation-approved educational standards is not a viable or responsible solution to addressing workforce shortages. These standards exist to ensure that practitioners are thoroughly prepared with the knowledge, clinical judgment, and technical proficiency required to provide safe and effective care.

In my role as an educator at TMCC, I have direct knowledge of the rigorous academic and clinical preparation our dental hygiene students undergo. Their curriculum includes extensive didactic coursework paired with approximately 2,900 hours of supervised clinical patient care. This level of training is essential to develop the competencies required for safe scaling and patient assessment.

Dental assistants, under the proposed model, would not receive comparable education or clinical experience.

Furthermore, there are significant concerns regarding who would be responsible for training and assessing these assistants, and whether consistent standards of competency could be ensured across settings.

It is imperative that we uphold patient safety and maintain the high professional standards that protect the public. Approving this proposal would represent a significant and concerning departure from those standards.

Thank you for the opportunity to provide testimony today. I would be happy to answer any questions you may have.

Sincerely,

Kerry Kuster, RDH, MS

Kerry M. Kuster, RDH, MS

Dental Hygiene Professor

Truckee Meadows Community College

Reno, NV 89512

(775) 674-7593

kkuster@tmcc.edu

Pronouns: She, Her, Hers

--

Public Records Notice: In accordance with Nevada Revised Statutes (NRS) Chapter 239, this email and responses, unless otherwise made confidential by law, may be subject to the Nevada Public Records laws and may be disclosed to the public upon request.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:03 PM
To: Rebekah Vanleer
Subject: Fw: Public Comment on Agenda Items 6.a.v and 6.a.iv – Patient Safety and Professional Standards

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:31 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Public Comment on Agenda Items 6.a.v and 6.a.iv – Patient Safety and Professional Standards

From: Khyre <iamkhyre@gmail.com>
Sent: Monday, March 23, 2026 5:40 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Public Comment on Agenda Items 6.a.v and 6.a.iv – Patient Safety and Professional Standards

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Khyre Rutherford, and I am a dental hygiene student with a strong commitment to patient care, safety, and the integrity of our profession.

I am writing to express my concern regarding agenda item 6.a.v, which proposes allowing unlicensed and under-trained dental assistants to perform supragingival scaling. I respectfully oppose this proposal. Dental hygiene procedures, including supragingival scaling, require a deep understanding of oral anatomy, instrumentation, infection control, and patient assessment. These are not skills that can be safely performed without proper CODA-accredited education and clinical training. Allowing individuals without this foundation to perform scaling puts patients at risk for improper care, missed diagnoses, and potential harm.

Patient safety should always be the priority. Lowering the standard of care not only jeopardizes the public but also undermines the education and licensure process that registered dental hygienists are required to complete.

Additionally, I would like to express my support for agenda item 6.a.iv regarding adjustments to RDH supervision language. Expanding the ability of licensed dental hygienists to practice without direct dentist supervision can improve access to care while still maintaining high professional standards.

Registered Dental Hygienists are extensively trained and qualified to provide preventive services safely and effectively.

In summary:

- I strongly OPPOSE agenda item 6.a.v
- I SUPPORT agenda item 6.a.iv

Thank you for your time and consideration. I urge the Board to prioritize patient safety and uphold the professional standards that protect the public.

Sincerely,

Khyre Rutherford

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:34 PM
To: Rebekah Vanleer
Subject: Fw: Public comment on agenda

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:23 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Public comment on agenda

-----Original Message-----

From: Kristen Grayson <kgrayson724@hotmail.com>
Sent: Friday, March 20, 2026 10:36 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Public comment on agenda

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to express my strong opposition to agenda item 6.a.v, which proposes allowing unlicensed or insufficiently trained dental assistants to perform supragingival scaling. At the same time, I want to voice my full support for agenda item 6.a.iv, which updates supervision language to allow licensed Registered Dental Hygienists (RDHs) to practice without dentist supervision.

Supragingival scaling is a clinical procedure that requires formal CODA-accredited education, competency assessment, and licensure. Allowing individuals without this training to perform scaling undermines patient safety, weakens professional standards, and creates unnecessary risk for the public. Dental assistants are valuable members of the dental team, but scaling is not within their educational preparation or scope. Expanding duties without accredited training is not in the best interest of Nevada patients.

In contrast, supporting RDH autonomy aligns with evidence-based practice, national workforce trends, and Nevada's need for increased access to preventive oral health care. RDHs are highly trained, licensed professionals whose education includes extensive instruction in scaling, assessment, infection control, and patient management. Allowing hygienists to practice without direct dentist supervision strengthens Nevada's oral health workforce and improves access to care while maintaining high standards of safety and quality.

For these reasons, I respectfully urge the Board to:

- OPPOSE agenda item 6.a.v
- SUPPORT agenda item 6.a.iv

Thank you for your consideration and for your commitment to protecting the oral health of Nevadans.

Sincerely,
Kristen Grayson RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:20 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to agenda item 6a V

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:43 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Opposition to agenda item 6a V

From: Kristin Temme <toothfairyrhdh13@gmail.com>
Sent: Sunday, March 22, 2026 2:49 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to agenda item 6a V

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,
I am writing to express my strong opposition to Agenda Item 6a V, which proposes allowing dental assistants to perform supragingival scaling under a temporary special endorsement authorized by a supervising dentist.

As a Registered Dental Hygienist with 19 years of clinical experience, I have dedicated my career to providing safe, evidence-based preventive care to patients across Nevada. Supragingival scaling is not a simple or purely mechanical task—it requires comprehensive education, clinical judgment, and the ability to recognize underlying periodontal conditions, systemic implications, and patient-specific risk factors. These competencies are developed through rigorous accredited training programs and licensure requirements specific to dental hygiene.

Allowing unlicensed or under-trained dental assistants to perform procedures involving the removal of calculus, plaque, and stain—even under the premise of a “temporary special endorsement”—poses significant risks to patient safety. The use of hand instruments, ultrasonic scalers, and air-polishing devices demands a thorough understanding of instrumentation techniques, infection control, tissue management, and the identification of contraindications. These are not skills that can be adequately taught or assessed through abbreviated or temporary training pathways.

Furthermore, this proposal undermines the integrity of the dental hygiene profession and lowers the standard of care that patients in Nevada both expect and deserve. It creates a precedent where clinical

procedures requiring licensure and accountability are delegated to individuals without the same level of education, regulation, or oversight.

I am particularly concerned with the language in Agenda Item 6.A.V stating that assistants may be “authorized by the dentist” to perform these duties. While dentists play a critical leadership role in patient care, authorization alone cannot replace standardized education, licensure, and competency validation established through the Board and accredited institutions.

In contrast, I would like to express my support for Agenda Item 6.A.IV, which I believe provides a resolution to the workforce shortage that is propelling the dentists in Nevada to undermine dental hygienists and the minimum of 2,932 hours of education that we have received. I believe that 6.A.IV would allow hygienists to practice to the full extent of our scope of practice while keeping patient care and safety at the forefront of our minds.

I respectfully urge the Board to reject Agenda Item 6.A.V in its current form and to prioritize patient safety, professional standards, and the long-term integrity of dental care in Nevada.

Thank you for your time and consideration of this important matter.

Sincerely,

Kristin Temme, BSDH, M.Ed

Registered Dental Hygienist with 19 Years of Clinical Experience

Date: March 23, 2026

To: Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, NV 89014

From: Lancette VanGilder, BS, RDH, PHEDH, CEAS, FADHA, ADHA President

Subject: Support NAC 631.210 and Public Health Endorsed Programs, Oppose NAC 631.220

Dear President West and Members of the Nevada State Board of Dental Examiners:

On behalf of the American Dental Hygienists' Association (ADHA) and as a licensed dental hygienist in Nevada, I write to provide testimony on three agenda items for the March 25, 2026, board meeting. The ADHA strongly supports initiation of workshop discussion on the dental hygiene portion of NAC 631.210 and strongly opposes any effort under NAC 631.220 to authorize dental assistants to perform scaling procedures. In addition, we urge the dental board to not place unnecessary and over restrictive administrative burdens on public health programs that are working to meet the needs of the underserved communities in Nevada.

Nevada statute has long recognized the legitimacy and safety of authorization-based practice for licensed dental hygienists. NRS 631.311 has allowed this framework for more than twenty years, first enacted in 2003 and expanded again in 2019. These statutory provisions reflect a clear legislative determination: licensed dental hygienists are educated, examined, and qualified healthcare professionals who can safely provide care under authorization without requiring dentist supervision.

For that reason, moving forward with NAC 631.210 is not a radical change. It is a long-overdue regulatory alignment with existing Nevada law, evidence-based practice, and the realities of modern care delivery. Delaying implementation of authorization-based practices has unnecessarily constrained access to preventive oral health services. It has also reinforced an outdated regulatory model that undervalues the education, clinical judgment, and professional accountability of licensed dental hygienists. A modern regulatory framework should recognize dental hygienists as the licensed oral health professionals they are and should allow them to practice to the full extent already enacted by Nevada statute.

Nevada's own public health planning documents have recognized oral health workforce challenges, provider maldistribution, and access barriers across the state. These realities support policies that more effectively deploy licensed dental hygienists where prevention, early intervention, and continuity of care are needed most. **Failure to implement this long-standing statutory authority has not protected the public; it has instead restricted care and limited the state's ability to utilize the dental hygiene workforce efficiently.**

By contrast, the Board should not attempt through NAC 631.220 what the Nevada Legislature has repeatedly declined to enact through statute. Dental assistant scaling has been rejected or left unenacted three separate times across 2023 and 2025. In 2023, Nevada established the licensure and regulatory framework for expanded function dental assistants without granting authority to perform scaling. In 2025, AB 334 and SB 495 again attempted to include similar intent, and it did not pass in the Legislature. This is not an unclear legislative record. It is a consistent pattern demonstrating that Nevada lawmakers have not authorized dental assistant scaling, and the Board should not attempt to create by regulation what the Legislature has refused to place into statute.

Scaling is not an entry-level support function. It is a clinical procedure requiring college education in oral anatomy, periodontology, biofilm and calculus management, medical history, contraindications, instrumentation, tissue response, infection prevention, patient and risk assessment, and professional accountability. The American Dental Hygienists' Association policy states that *"scaling procedures require advanced education, assessment, instrumentation, and critical thinking skills and should be performed by licensed dental hygienists, licensed dental therapists, or licensed dentists educated through accredited pathways."* Authorizing individuals who are undertrained and unlicensed would lower the standard of care and create avoidable risk for Nevada patients.

The issue before the Board is therefore straightforward. The hygiene portion of NAC 631.210 advances a lawful, evidence-based, and long-recognized authorization model for licensed professionals. The dental assistant scaling proposal does the opposite: it bypasses education, examination, licensure, and legislative intent. One expands access while preserving professional standards. The other lowers standards while disregarding the Legislature's repeated decisions.

Regarding the public health endorsement section of the agenda, it is imperative to maintain strong infection control standards and professional accountability; however, as a Public Health Endorsed Dental Hygienist serving some of Nevada's most rural and underserved communities, I see firsthand that endorsed providers are already vetted through a rigorous approval process and are practicing safely in areas where access is otherwise extremely limited. In many of these communities, there are no dentists nearby; very few (if any) providers that accept Medicaid, and patients often have not received dental care for years, if ever. Imposing additional administrative burdens or restrictive conditions on these qualified providers will not strengthen public protection.

The Board's mission is to protect the health, safety, and welfare of the public. I respectfully ask that every action taken on these agenda items be measured against that duty.

Lancette VanGuilder, BS, RDH, PHEDH, CEAS, FADHA

President

American Dental Hygienists' Association

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:32 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:34 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Opposition to Agenda Item 6.a.v

From: lareepurdum@gmail.com <lareepurdum@gmail.com>
Sent: Saturday, March 21, 2026 7:38 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the NSDBE,

I am writing to express my opposition to agenda item 6.a.v.

As a practicing dental professional in Nevada, I take patient safety and standards of care seriously. Allowing unlicensed and under-trained dental assistants to perform supragingival scaling raises significant concerns. Scaling—even supragingivally—is not a simple task. It requires a thorough understanding of oral anatomy, disease processes, instrumentation, and the ability to recognize when something is not normal. These are skills developed through accredited education and clinical training, not short-term instruction.

Lowering the educational standard to perform these procedures puts patients at unnecessary risk. It also creates confusion about the role of licensed dental hygienists, whose training is specifically designed to ensure safe, effective preventive care. Patients trust that when they receive a cleaning, it is being performed by someone properly trained and licensed to do so.

I understand the need to improve access to care. However, reducing standards is not the solution. Expanding the use of licensed hygienists, supporting workforce development, and addressing reimbursement barriers are more appropriate ways to meet patient needs without compromising safety.

I respectfully urge the Board to reject agenda item 6.a.v and uphold the educational and professional standards that protect Nevada patients.

Thank you for your time and consideration.

Sincerely,

LaRee Purdum, RDH

Sparks, NV

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:47 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda Item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:31 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda Item 6.a.v

From: Laura Cambra <2thfairylaura@gmail.com>
Sent: Tuesday, March 24, 2026 11:55 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda Item 6.a.v

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Dear Members of the Nevada State Board of Dental Examiners,

I am writing to you today as a registered dental hygienist to formally express my strong opposition to agenda item 6.a.v.

Specifically, I oppose the proposal to allow dental assistants to perform scaling procedures. It is my professional opinion that such a change would prevent patients from receiving the same standard of care they currently expect and deserve.

Over the past year, since this matter was discussed in the legislature, I have spoken to countless patients regarding the potential for lowered educational requirements for those performing these procedures. My patients have been consistently appalled by this idea; in fact, not one patient I have spoken with has supported this proposal. It is your duty as the board to protect the public and listen to their opinions.

I do support 6.a.iv as removing restrictions on dental hygienists will help bring more care to at risk and rural populations.

I urge the Board to protect the safety of the public by rejecting 6.a.iv and passing 6.a.iv.

Sincerely,

Laura Cambra, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:00 PM
To: Rebekah Vanleer
Subject: Fw: 6.a.iv--SUPPORT supervision of Dental Hygienist without a Dentist

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:32 AM
To: Arielle Cymerman <acymerman@dental.nv.gov>; Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: 6.a.iv--SUPPORT supervision of Dental Hygienist without a Dentist

From: Laura Richardson <lauradrichardson1@gmail.com>
Sent: Monday, March 23, 2026 6:54 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: 6.a.iv--SUPPORT supervision of Dental Hygienist without a Dentist

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I (Laura D Richardson RDH) SUPPORT supervision without a Dentist.

We need and deserve our own governing board.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:02 PM
To: Rebekah Vanleer
Subject: Fw: 6.a.v OPPOSE--Supragingival scaling by dental assistants

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:32 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: 6.a.v OPPOSE--Supragingival scaling by dental assistants

From: Laura Richardson <lauradrichardson1@gmail.com>
Sent: Monday, March 23, 2026 6:37 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: 6.a.v OPPOSE--Supragingival scaling by dental assistants

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I (Laura D Richardson RDH) strongly OPPOSE supragingival scaling by Dental Assistants.

Would you allow a "home roofer" to pour your foundation concrete on your new build house????

Would you allow a LPN to provide a potentially life damaging procedure on your infant child????

As my father told me, "you are not paid for what you do, you are paid for what you know and what you don't know you know where to go to find the answer.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:56 AM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:34 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Laura Moss
Sent: Monday, March 23, 2026 7:46 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am also concerned that the Nevada Dental Board has been telling me I need several thousands of dollars of CE licensing fees specialized course work etc for years in order to scale teeth. Will these fees be reimbursed if this measure passes? I will be contacting an attorney to answer these questions. Please put the health and safety of the public first which is your duty to do.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Laura Moss
511 Gardenia Blossom St
Henderson, NV 89015
lauralrdh@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:55 PM
To: Rebekah Vanleer
Subject: Fw: 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:58 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: 6.a.v

From: lauren mirsky <lbmirsky@gmail.com>
Sent: Monday, March 23, 2026 8:42 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am writing to voice my opinion against bill 6.a.v which would allow untrained dental assistants to scale teeth and utilize cavitrons without proper training and licensure. This bill would be harmful to the general public.

Vote NO and do not allow untrained and unlicensed personnel to replace highly trained, skilled, and licensed dental hygienists.

Lauren Mirsky, RDH, MS
7460 Opus One Drive
Reno, NV 89605

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:02 PM
To: Rebekah Vanleer
Subject: Fw: Agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:57 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Agenda item 6.a.v

From: Lauren Musil <laurenm566@aol.com>
Sent: Monday, March 23, 2026 8:12 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the NSBDE,

I am writing to express my strong opposition to agenda item 6.a.v, which seeks to permit dental assistants to perform supragingival scaling and other procedures traditionally reserved for licensed dental hygienists. As a licensed dental hygienist in Nevada with 18 years of clinical experience, I believe this proposal presents a serious risk to patient safety and undermines the professional standards that protect the public.

My concerns are as follows:

- Scaling Is a Skilled Clinical Procedure

Scaling is not a simple or purely mechanical task. It is both preventive and therapeutic, requiring a thorough understanding of periodontal anatomy, oral microbiology, and disease progression. The ability to differentiate between health and disease—and to respond appropriately—comes from years of formal education and clinical training.

- Increased Risk to Patient Safety

Dental hygienists complete rigorous, CODA-accredited education and must demonstrate clinical competency through licensing examinations. Allowing dental assistants, who do not receive this level of training, to perform scaling increases the risk of incomplete calculus removal, undiagnosed periodontal disease, and improper technique. This can lead to “supervised neglect,” where disease progresses while the patient believes they have received adequate care.

- Potential for Irreversible Harm

Even supragingival scaling, when performed improperly, can result in permanent damage, including soft tissue trauma and unnecessary removal of tooth structure. These are irreversible outcomes that should only be entrusted to fully trained and licensed professionals.

- A Slippery Slope for Professional Standards

Expanding the scope of practice for dental assistants in this manner sets a concerning precedent. It creates a slippery slope in which increasingly complex procedures may be delegated to less-trained individuals over time. This gradual erosion of professional standards ultimately compromises the quality of care and diminishes the role and value of licensed dental hygienists.

- Workforce Shortages Should Not Compromise Care

While workforce shortages may be a concern, lowering standards of care is not an appropriate solution. Protecting patient health and maintaining clinical excellence must remain the priority over convenience or cost-saving measures.

For these reasons, I respectfully urge you to reject [Bill Number/Proposal] and instead focus on solutions that support and expand the role of licensed dental hygienists in Nevada, allowing them to practice to the full extent of their education and training.

Thank you for your time and consideration.

Sincerely,

Lauren Musil, RDH

702-858-3197

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:48 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:30 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: leah o <leahobine@gmail.com>
Sent: Tuesday, March 24, 2026 11:30 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Leah Obine and I am aHealthcare professional residing inLas Vegas, NV 89117. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Leah Obine
(702) 510-7344
Leahobine@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:52 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSITION TO 6a V

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:29 PM
To: Arielle Cymerman <acymerman@dental.nv.gov>; Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: OPPOSITION TO 6a V

-----Original Message-----

From: Ledena Brooke <ledenab@icloud.com>
Sent: Tuesday, March 24, 2026 11:03 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSITION TO 6a V

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Board of Dental Examiners,
I am writing to express my wholehearted opposition to 6a V, allowing dental assistants to scale teeth.
I am asking that you continue to protect the Nevada public by allowing only CODA educated, National Board qualified dental hygienist to scale teeth.
Respectfully,
Ledena Brooke, BSDH
Nevada License #2593
Sent from my iPad

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:15 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Proposed Expansion of Dental Assistant Duties

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:16 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Opposition to Proposed Expansion of Dental Assistant Duties

From: Lee Sheldon <plac1man@gmail.com>
Sent: Sunday, March 22, 2026 9:10 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Proposed Expansion of Dental Assistant Duties

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please read for public comment.

Lee N. Sheldon, DMD

Periodontist
3912 West Eau Gallie Blvd
Melbourne, FL 32935
321-259-9980
DrLee@solidbite.com

March 23, 2026

Nevada State Board of Dental Examiners

RE: Opposition to Proposed Expansion of Dental Assistant Duties to Include Supragingival Scaling
Dear Members of the Board,

I am a periodontist with over four decades of clinical experience in the diagnosis and treatment of periodontal disease. I am writing to express my opposition to the proposal that would allow dental assistants to perform supragingival scaling. Although I practice in Florida, the biological and clinical principles of periodontal disease are universal, and the concerns raised by this proposal apply broadly to patient care.

In clinical practice, there is no clear or reliable boundary between supragingival and subgingival calculus. Calculus frequently extends beneath the gingival margin, and the presence or absence of

visible deposits does not accurately reflect the presence or severity of disease. Inflammation is not always apparent, particularly in smokers, and bleeding is not a consistent indicator. What may appear to be a simple supragingival deposit is often part of a broader subgingival disease process. We can't just stop the scaler at an arbitrary line. Such compromises the patient.

For this reason, scaling is not a discrete mechanical task. Scaling requires continuous assessment, interpretation, and decision-making. The provider must be able to recognize disease, determine its extent, and respond appropriately during treatment.

Delegating this procedure to individuals who are not educated, trained, or licensed to assess periodontal disease introduces a predictable risk: incomplete treatment, missed pathology, and progression of disease. This risk is not theoretical. 42% of the U.S. adult population over the age of 30 has chronic periodontitis. Therefore, a substantial portion of the patient population presenting for "routine" care may already have underlying periodontal disease that is not clinically obvious. In this context, the inability to recognize and appropriately respond to disease during scaling creates a significant and widespread risk of undertreatment.

The proposed requirement that a licensed provider subsequently evaluate or confirm the assistant's work does not mitigate this concern. It introduces redundancy without improving safety and raises important questions regarding responsibility and standard of care. If a licensed clinician must ultimately assess and correct the procedure, then the procedure itself cannot be considered safely delegable.

From a patient standpoint, this proposal also raises concerns regarding transparency and trust. Patients reasonably expect that procedures involving the identification and treatment of disease are performed by appropriately trained and licensed professionals.

Workforce challenges are real, but lowering the standard of care is neither appropriate nor safe. In summary, this proposal attempts to separate a clinical procedure from the clinical judgment that makes it safe and effective. That separation is not supported by the biological or clinical realities of periodontal disease.

For these reasons, I strongly urge the Board to reject this proposal.

Respectfully,
Lee N. Sheldon, DMD
Periodontist

--

Dr. Lee Sheldon
Periodontist

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:20 PM
To: Rebekah Vanleer
Subject: Fw: Public Comment on Agenda Items 6a IV and 6a V

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:43 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Public Comment on Agenda Items 6a IV and 6a V

From: Leslie Ayres <leslie.bsdh@gmail.com>
Sent: Sunday, March 22, 2026 3:25 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Public Comment on Agenda Items 6a IV and 6a V

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to express my strong support for Agenda Item 6a IV and my opposition to Agenda Item 6a V ahead of your upcoming meeting this Wednesday.

I respectfully urge the Board to allow dental hygienists to practice to the full extent of their education and licensure without unnecessary supervision. Expanding the ability for hygienists to provide care independently, within our established scope, is a critical step toward improving access to care and addressing ongoing workforce challenges in our state.

At the same time, I strongly oppose the proposal to permit dental assistants with only 200 hours of education to perform scaling procedures, including hand scaling, ultrasonic scaling, and air polishing. These are complex clinical procedures that require extensive training, skill, and clinical judgment to perform safely and effectively. Allowing inadequately trained individuals to carry out these services puts patient safety at risk and undermines the quality of care.

This proposal does not meaningfully address workforce shortages. Instead, it lowers the standard of care and may ultimately cause harm to the public. Patients deserve treatment from appropriately trained and licensed professionals.

Thank you for your time, consideration, and commitment to protecting public health and maintaining high standards in dental care.

Sincerely,
Leslie Crane, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:30 PM
To: Rebekah Vanleer
Subject: Fw: 6.a.v opposition

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:50 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: 6.a.v opposition

-----Original Message-----

From: Mendoza <4dozers@gmail.com>
Sent: Monday, March 23, 2026 5:19 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: 6.a.v opposition

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

I am writing to vehemently oppose 6.a.v! I have been a dental hygienist for over 20 yrs and the education I have received is above and beyond what you would allow for a dental assistant to be able to scale teeth. Please do not pass this bill, everyone who works on patients in the capacity of a hygienist needs to attend formal schooling! Giving assistants this responsibility with only minimal education is irresponsible on your part, it will increase patient trauma and not be a helpful tool to fill the need.

Thank you,
Leslie Mendoza, RDH w/NV and CA licensure.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:32 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:48 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Liesel Tavey
Sent: Monday, March 23, 2026 3:51 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Liesel Tavey
7519 Devonshire Ln
Reno, NV 89511
liesel37@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:16 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:16 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Lilia Mesropyan
Sent: Sunday, March 22, 2026 8:58 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

As a dental hygienist, I strongly oppose the proposed change to allow unlicensed dental assistants to perform supragingival scaling. This procedure requires formal education, clinical training, and a deep understanding of periodontal health, patient safety, and disease management—competencies that are developed through CODA-accredited dental hygiene programs and licensure.

Allowing individuals without this level of training to perform scaling not only undermines the integrity of our profession but also raises serious concerns regarding patient safety and quality of care. As providers who are directly responsible for preventive and periodontal services, we must ensure that standards remain high and evidence-based.

I respectfully urge the Nevada State Board of Dental Examiners to reject this proposal and continue to support the role of licensed dental hygienists in delivering safe and effective care.

Thank you for your consideration.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Lilia Mesropyan
9615 Starfish Reef Way
Las Vegas, NV 89178
liliamesropyan@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:16 PM
To: Rebekah Vanleer
Subject: Fw: Opposition/Support Letter

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:51 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition/Support Letter

From: Lilian Bogdanova <lilian0590@yahoo.com>
Sent: Monday, March 23, 2026 11:10 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition/Support Letter

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To The Nevada State Board of Dental Examiners,

I am writing in opposition of agenda item 6.a.v regarding dental assistants performing supra-gingival scaling. Although assistants will receive some extra training, it will not be enough to learn how to accurately and precisely scale, even supra-gingivally. It will compromise the safety of the public and provide sub standard care. In addition, this has been previously proposed during the last legislative session and has already been denied. Please consider how we may support our local dental hygiene program aid them in funding to be able to accept more students and have a larger graduating class.

On the other hand, I do support agenda item 6.a.iv regarding the changes to supervision for a dental hygienist. This is a great option to increase the amount of dental hygienists in the state, and to increase the amount of patients that dental hygienists can treat when a dentist is not present in the office.

Thank you for your consideration,
Lilian Braner, RDH, BSDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:31 PM
To: Rebekah Vanleer
Subject: Fw: Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:37 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Agenda Item 6.a.v

-----Original Message-----

From: Lindsay Scott <lindsayannee@aol.com>
Sent: Saturday, March 21, 2026 10:23 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am opposing Agenda item 6.a.v for the safety and wellness of our public.

I'd like this to be a part of public record.

Lindsay Brien

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:15 PM
To: Rebekah Vanleer
Subject: Fw: Opposition of 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:39 AM
To: Arielle Cymerman <acymerman@dental.nv.gov>; Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Opposition of 6.a.v

-----Original Message-----

From: Lindsay Brunner <lindsaysbrunner@gmail.com>
Sent: Monday, March 23, 2026 12:56 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition of 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I want to firmly stand my ground on opposing agenda item 6.a.v. This not only undermines every single hygienist and what they went to school for, for years to be able to do. We have so much more training on so many different topics. A few examples are medications and their interactions, as well as side effects they have that influence the oral cavity. We also understand the process of cavity formation, the role diet plays in caries prevention, the proper ways to brush and floss etc. We also have taken many classes on oral lesions and what they look like. Allowing assistants to do this job is substandard of care and if this gets passed it should absolutely be required for them to tell patients that they are an assistant and not a registered dental hygienist. And if you think this is going to solve the lack of hygienists and the pay issue you are so wrong. Assistants will end up wanting the same pay as hygienists with half the training. You're setting patients up to become perio patients from improper removal of calculus, and not only that but a prophy is not only removing Supra calc. So allowing assistants to scale Supra gingivally is a sub par cleaning and neglect as far as I'm concerned.

Lindsay Brunner

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:34 PM
To: Rebekah Vanleer
Subject: Fw: Regarding Agenda Item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:25 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Regarding Agenda Item 6.a.v

From: Lisa Cronin <juna223@hotmail.com>
Sent: Saturday, March 21, 2026 9:51 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Regarding Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Nevada State Board of Dental Examiners,

As a proud, licensed Dental Hygienist of 25 years, I am writing to express my strong opposition to Agenda Item 6.a.v, which proposes allowing uneducated, unlicensed dental assistants to perform supragingival scaling.

Dental hygienists complete rigorous education and training—typically four years of college-level coursework, including biomedical sciences, pre-medical prerequisites, national board examinations, and clinical competency testing. This extensive preparation ensures that patients receive comprehensive, effective, and safe preventive care.

Allowing individuals without this education or licensure to perform scaling procedures undermines both patient safety and the integrity of the dental profession. Supragingival scaling performed in isolation is **not** effective preventive care. It does not address the subgingival biofilm and calculus that contribute to periodontal disease, nor does it provide the level of assessment and clinical judgment required to identify early signs of pathology.

This proposal diminishes the value of the dental hygiene profession and risks misleading patients into believing they are receiving adequate periodontal care when they are not. I urge the Board to uphold the standards that protect the public and to reject Agenda Item 6.a.v.

Please respect the education, licensure, and clinical expertise of Nevada's dental hygienists, and preserve the integrity of the dental profession.

Thank you for your consideration.

Sincerely,

Lisa Cronin RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:36 PM
To: Rebekah Vanleer
Subject: Fw: Support for Authorization-Based Practice for Dental Hygienists and Opposition to Delegation of Scaling Procedures to Dental Assistants

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 8:37 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Support for Authorization-Based Practice for Dental Hygienists and Opposition to Delegation of Scaling Procedures to Dental Assistants

From: Lisa Daniels <HygieneChick@outlook.com>
Sent: Friday, March 20, 2026 12:17 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Support for Authorization-Based Practice for Dental Hygienists and Opposition to Delegation of Scaling Procedures to Dental Assistants

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to express strong support for proposed updates to NAC 631.210 that expand the use of **authorization in lieu of supervision** for licensed dental hygienists, and to respectfully oppose the proposal to permit dental assistants to perform supragingival scaling procedures.

At its core, this issue is not simply about workforce numbers—it is about **maintaining the standard of care while improving access to services.**

Dental hygienists are licensed healthcare professionals who complete **no less than 2,932 hours of formal education and clinical training**. This education includes, but is not limited to, pharmacology, periodontology, pathology, anatomy, radiology, and patient assessment. These are not ancillary skills—they are essential to safely performing procedures such as scaling, which require the ability to recognize disease, adapt treatment in real time, and prevent harm.

The proposed authorization model appropriately leverages this training. By allowing hygienists to practice to the full extent of their education without unnecessary supervision requirements, the Board can immediately improve access to care **without lowering clinical standards**. Authorization maintains the dentist’s role in diagnosis and overall patient management, while removing logistical barriers that currently limit efficiency in practice settings.

In contrast, the proposal to allow dental assistants to perform supragingival scaling introduces significant concerns:

First, the training requirements outlined—approximately 200 hours—are not comparable to the thousands of hours required for licensure as a dental hygienist. Scaling is not a purely mechanical task. Even when intended to be “supragingival only,” instrumentation frequently enters the sulcus, and the ability to differentiate between health, gingivitis, and periodontitis is critical to preventing patient harm.

Second, the proposal does not meaningfully resolve workforce shortages. It requires **direct, one-to-one supervision** by a dentist or dental hygienist, mandates that a licensed provider examine the patient, and requires completion of subgingival scaling by a licensed provider before dismissal. This results in **duplicative care**, not increased capacity.

Third, the model assumes that dental hygienists will train and supervise individuals to perform portions of procedures that fall squarely within their licensed scope of practice. This is neither a sustainable workforce strategy nor an efficient use of licensed providers.

Finally, the proposal creates a fragmented care model in which two providers are required to complete what one licensed dental hygienist is fully qualified to perform

independently. This increases complexity, liability, and inefficiency without delivering a clear benefit to patients.

If the Board's goal is to improve access to preventive oral healthcare, the most effective and responsible solution is to **remove unnecessary supervisory barriers for licensed professionals—not to delegate clinical procedures to individuals who do not meet the established standards for licensure.**

For these reasons, I strongly urge the Board to support the authorization language changes within NAC 631.210 and to reject the expansion of supragingival scaling duties to dental assistants.

Thank you for your consideration and for your commitment to protecting the health and safety of the public.

Lisa Daniels, RDH
President-Elect, NDHA



Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:07 PM
To: Rebekah Vanleer
Subject: Fw: opposing agenda 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:29 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: opposing agenda 6.a.v

From: L McCook <lamccook@gmail.com>
Sent: Sunday, March 22, 2026 10:35 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: opposing agenda 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear leaders

please oppose agenda 6.a.v in which would allow dental assistants to perform supragingival scaling on patients. The training on scaling takes years to master as well as having a thorough training on a patients medical history and contraindications before being able to scale teeth. Not being able to scale fully which harm the patients overall health and would lead to more problems down the road. Please reconsider this bill.

thank you
Lisa

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:07 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda Item 6.a.v – Proposed Amendment to NAC 631.220 - dental assistants supragingival scaling special endorsement
Attachments: Opposition to Agenda Item 6.a.v – Proposed Amendment to NAC 631.220 - Google Docs.pdf

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 1:05 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda Item 6.a.v – Proposed Amendment to NAC 631.220 - dental assistants supragingival scaling special endorsement

From: Liz Ch <lizandraberrio@gmail.com>
Sent: Tuesday, March 24, 2026 12:55 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda Item 6.a.v – Proposed Amendment to NAC 631.220 - dental assistants supragingival scaling special endorsement

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Board,

I am writing as a Registered Dental Hygienist in Nevada to express my **strong and urgent opposition to Agenda Item 6.a.v**, which proposes allowing dental assistants to obtain a special endorsement to perform supragingival scaling.

As a recent graduate of an accredited dental hygiene program, I dedicated years of my life to rigorous education, clinical training, and competency evaluation to safely perform procedures that may appear simple, but are not. Supragingival scaling is not just “removing plaque.” It requires the ability to assess tissue health, recognize early signs of periodontal disease, understand systemic implications, and make clinical judgments in real time. These are skills developed through structured education, not short-term training.

Lowering the standard of care in response to a workforce shortage is deeply concerning. It sends the message that the safety and well-being of patients can be compromised for convenience. As healthcare providers, we have an ethical responsibility to protect the public, not expose them to increased risk of missed diagnoses, improper instrumentation, and incomplete care.

I understand the pressure to address access-to-care issues. However, this proposal does not solve the root problem, it simply shifts responsibility to individuals who have not been trained to the level required for safe, comprehensive care. There are more effective and sustainable solutions, including expanding accredited dental hygiene programs, supporting faculty, and increasing access of hygiene license portability from state to state.

Seeing similar measures adopted in other states, such as Arizona, is not reassuring, it is alarming. Nevada has the opportunity to lead by example and uphold the highest standards in oral healthcare, rather than follow a path that diminishes the role and expertise of licensed dental hygienists. Reducing barriers for already trained and licensed professionals would help address shortages without compromising patient safety or educational standards.

I respectfully and strongly urge the Board to **reject this amendment to NAC 631.220**. The decision you make will directly impact the quality of care patients receive and the future of our profession.

Please prioritize patient safety, uphold educational standards, and protect the integrity of dental hygiene in Nevada.

Thank you for your time and consideration.

(Attached is the PDF version of this letter)

Respectfully,
Lisandra Chavez Berrio, BSDH, RDH
License# **103247**

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:28 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6.A.V

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:39 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Oppose 6.A.V

From: Lori Biunno <flavorslori@gmail.com>
Sent: Sunday, March 22, 2026 8:11 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6.A.V

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Nevada State Board of Dental Examiners,
As a proud, licensed Dental Hygienist of 30 years, I am writing to express my strong opposition to Agenda Item 6.a.v, which proposes allowing uneducated, unlicensed dental assistants to perform supragingival scaling.

Dental hygienists complete rigorous education and training—typically four years of college-level coursework, including biomedical sciences, pre-medical prerequisites, national board examinations, and clinical competency testing. This extensive preparation ensures that patients receive comprehensive, effective, and safe preventive care.

Allowing individuals without this education or licensure to perform scaling procedures undermines both patient safety and the integrity of the dental profession. Supragingival scaling performed in isolation is not effective preventive care. It does not address the subgingival biofilm and calculus that contribute to periodontal disease, nor does it provide the level of assessment and clinical judgment required to identify early signs of pathology.

This proposal diminishes the value of the dental hygiene profession and risks misleading patients into believing they are receiving adequate periodontal care when they are not. I urge the Board to uphold the standards that protect the public and to reject Agenda Item 6.a.v.

Please respect the education, licensure, and clinical expertise of Nevada's dental hygienists, and

preserve the integrity of the dental profession.
Thank you for your consideration.

Sincerely,
Lori Biunno R.D.H.

March 22, 2026

Opposition Statement for NSBDE agenda Item 6.a.v
Support Statement for NSBDE agenda item 6 a.iv

President Dr. Ronald West, DMD and members of the Board:

As a dental hygienist with 25 years of clinical experience and 19 years as a dental hygiene educator and program director at TMCC in Reno, Nevada, I strongly oppose agenda item 6.a.V, which would permit dental assistants with limited education and training to perform supra-gingival scaling. There are over 850 hours of clinical experience, dental hygiene students are required to complete and almost 2100 hours of didactic courses. This gives graduates the skill level required to pass their written and clinical boards to be a safe and effective dental hygienist.

Scaling is not simply “**cleaning teeth**”; it involves assessing gum health, identifying periodontal disease, and removing calculus above and below the gum line without damaging tissue. Minimally trained assistants may miss signs of disease, cause trauma to the gums or enamel, or leave harmful deposits behind, which can ultimately worsen conditions like periodontal disease rather than prevent them. Dental hygienists receive diagnostic training that goes beyond cleaning teeth, including performing periodontal charting, recognizing systemic links such as those associated with diabetes and oral health, and identifying abnormalities that may require referral; in contrast, dental assistants generally do not receive this level of education, so critical issues may go unnoticed.

Scaling requires clinical judgment, technical skill, and diagnostic awareness that come from formal dental hygiene education and licensure. Expanding duties to minimally trained assistants may seem practical in the short term, but it introduces significant risks without addressing the underlying shortage.

While agenda item 6 a.V promotes expanding the scope of dental assistants, then the scope for dental hygienists needs to expand. I support agenda item 6 a.IV, allowing dental hygienists to practice under no supervision. Benefits include, increased efficiency in the dental system allowing dentists to focus on complex procedures such as surgery, restorations, and diagnosis, while hygienists independently handle routine preventive care, reducing bottlenecks and shortening wait times.

In summary, dental hygienists are highly trained professionals who provide top-quality care, focusing on prevention, treatment, and patient education. Their expertise makes them an essential part of the dental team, ensuring optimal oral health and supporting overall patient well-being.

Sincerely,
Lori McDonald

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:12 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:18 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Lyn Hunter
Sent: Sunday, March 22, 2026 9:24 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

Hygienists don't only scale teeth. Our value is in the overall health of our patients. By allowing untrained assistants to supragingivally scale patients is a complete disservice to our patients. Even during the most routine prophylaxis patient, sublingual areas must be checked to ensure there is no residual calculus. These areas would be neglected and patients would have an increased incidence of periodontal disease. It's completely unethical to allow an untrained individual to possibly inflict harm to patients due to their ignorance.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards

and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Lyn Hunter
4362 Cranbrook Cir
Las Vegas, NV 89103
lynahunter4@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:08 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:29 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Lyra Mendoza
Sent: Sunday, March 22, 2026 10:22 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

18 years in the practice. I wouldn't want such procedures done on myself, family or friends by someone with out the important education.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are

prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Lyra Mendoza
1131 Wigwam Pkwy Apt 19212
Henderson, NV 89074
lyra.mendoza@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:22 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSE 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:54 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: OPPOSE 6.a.v

From: madonna hernandez <madcleo@hotmail.com>
Sent: Monday, March 23, 2026 7:07 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSE 6.a.v

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This a not standard of care!
This is NOT SAFE!!
This impacts public trust!!
The Nevada dental board should be shamed !!!!

I ONLY SUPPORT 6.a.iv

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Dear Members of the Nevada State Board of Dental Examiners,

I am writing to respectfully provide comment on the proposed changes outlined in agenda items 6.a.iv and 6.a.v.

I strongly oppose agenda item 6.a.v, which would allow unlicensed and insufficiently trained dental assistants to perform supragingival scaling. This procedure is not merely cosmetic—it requires a thorough understanding of oral anatomy, disease processes, infection control, and patient assessment. Permitting individuals without CODA-accredited education and appropriate licensure to perform scaling risks compromising patient safety, lowering the standard of care, and undermining the education and training of licensed dental professionals. Nevada patients deserve care delivered by individuals who are properly trained, licensed, and held to established professional standards.

Conversely, I strongly support agenda item 6.a.iv, which would update supervision language to allow Registered Dental Hygienists (RDHs) to practice without direct dentist supervision. RDHs are highly educated, licensed healthcare professionals who are trained to assess, prevent, and treat oral disease. Expanding their ability to practice independently would improve access to care, particularly in underserved and rural communities across Nevada, while maintaining a high standard of patient safety and clinical competence.

In summary, I urge the Board to prioritize patient safety, uphold the integrity of professional education, and support access to quality care by:

- Rejecting agenda item 6.a.v
- Approving agenda item 6.a.iv

Thank you for your time, consideration, and commitment to protecting the oral health of Nevada residents.

Respectfully,
Marcela Cardenas, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:57 PM
To: Rebekah Vanleer
Subject: Fw: Opposing 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:26 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing 6.a.v

From: Jill Hahn <hahn4224@gmail.com>
Sent: Tuesday, March 24, 2026 8:31 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi there,

My name is Margaret Hahn and I am writing to inform you that I OPPOSE 6.a.v.

This does not benefit the patient's care, now that they receive comprehensive and preventative care, and they would then be receiving care from an unlicensed, undertrained, lesser educated staff. I know I certainly wouldn't want this type of personnel working on my mouth with sharp instruments with zero education on how to use these instruments. State Legislation has stopped this 3 times already for public safety concerns. Stop the nonsense.

Having a dentist check before and after the assistant is done scaling is going to cause unnecessary burn out and cause them to run behind. I still recommend alternative solutions for dentists to have their hygienist work an accelerated schedule, seeing more patients with the help of a hygiene assistant to manage such a schedule.

I am in Support of 6.a.iv. -allowing the change of language of hygienists practicing without supervision.

Margaret J Hahn

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:59 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda Item 6.A.V – Amendment to NAC 631.220
Attachments: Letter.pdf

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:25 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda Item 6.A.V – Amendment to NAC 631.220

From: Marlon <marlonchu93@gmail.com>
Sent: Tuesday, March 24, 2026 7:36 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda Item 6.A.V – Amendment to NAC 631.220

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Board,

I am writing as a patient to express my concerns regarding Agenda Item 6.A.V, which would allow dental assistants, with a special endorsement, to perform supragingival scaling.

As someone who receives regular dental care, I feel more comfortable knowing that cleanings and procedures like scaling are performed by licensed dental hygienists who have extensive training in this area. Even if supragingival scaling may seem simple, I personally rely on these visits not just for cleaning, but also for identifying any potential issues early on.

I worry that allowing this procedure to be performed by dental assistants could affect the quality and consistency of care patients receive. From a patient's point of view, it's important to feel confident that the person providing treatment has the highest level of training for that specific procedure.

I understand the need to improve access to care, but I believe that maintaining strong professional standards is also essential to ensuring patient safety and trust.

For these reasons, I respectfully ask the Board to reconsider this proposed amendment.

Thank you for your time and for considering the perspective of patients like myself.

Sincerely,

A concerned patient.

Subject: Formal Opposition to Expansion of Dental Assistant Scope to Include Scaling

To the Nevada State Board of Dental Examiners,

My name is Marvelyn Navarro, RDH, the current President of the NDHA, and I am writing as both a licensed dental hygienist in Nevada and a concerned member of the public to formally express my strong opposition to any proposal that would allow dental assistants to perform supragingival scaling. While I understand the concerns about workforce shortages, this proposal is not a solution; it raises serious questions about patient safety and workforce sustainability. I strongly urge that matters of this magnitude should be addressed through the public and legislative process.

Scope of practice is established through the Nevada Revised Statutes (NRS Chapter 631), and any significant expansion of clinical duties, especially those involving irreversible procedures such as scaling, should be addressed through legislation. This concept has already been brought forward through the legislative process and was **not** passed, and these decisions must continue to be handled through the appropriate and transparent process.

Scaling, whether supragingival or subgingival, is not a simple task. It is part of a comprehensive clinical process that includes assessment, diagnosis, and disease management. Supragingival scaling alone does not treat periodontal disease, does not address subgingival biofilm or calculus, and does not prevent disease progression. Introducing a model where assistants perform isolated supragingival scaling creates fragmented care that lacks clinical judgment and continuity. It is also important to note that not even Expanded Function Dental Assistants (EFDAs) in Nevada are permitted to perform scaling. Expanding this duty to non-licensed and non-regulated dental assistants would represent a significant and unsafe departure from current standards.

Nevada is already facing a shortage of dental hygienists, not due to a lack of interest, but due to burnout and unsustainable working conditions. This proposal will not improve that reality. Instead, it will further devalue the role of the dental hygienist, increase frustration among clinicians, and contribute to more hygienists leaving the workforce. If a dental hygienist is expected to double-check or correct the work of an assistant, this does not improve efficiency; it creates redundancy and inefficiency. In reality, the hygienist would still be responsible for completing the care appropriately, meaning the hygienist is already doing the job.

It is also important to acknowledge that there is a current shortage of dental assistants. Expanding their scope by adding clinical responsibilities, such as scaling, does not address this shortage. In speaking with many assistants directly, there is a clear concern about taking on additional workload beyond their current responsibilities. This proposal risks placing further strain on an already limited workforce rather than providing meaningful support.

If the true goal is to improve access and efficiency, there are more appropriate and evidence-based solutions available. Accelerated hygiene models, improved workforce retention strategies, and supporting hygienists in practicing at the top of their license are all viable pathways that strengthen the profession rather than dilute it.

This proposal also raises important concerns regarding patient transparency and ethics. Will patients be informed that a licensed dental hygienist is not treating them? Will services performed by assistants be billed as prophylaxis? How will accountability and standardization of care be maintained? Without clear answers, this introduces risks related to misrepresentation, billing integrity, and erosion of patient trust.

As a clinician and advocate for patient safety, I strongly urge rejection of any proposal allowing dental assistants to perform scaling and support solutions that address workforce challenges without compromising care.

This is not simply a workforce issue; it is a matter of patient safety, professional integrity, and the future of dental hygiene. Nevada patients deserve care delivered by appropriately educated, licensed, and accountable professionals.

Thank you for your time and consideration.

Respectfully,

Marvelyn Navarro, RDH

Nevada Licensed Dental Hygienist – President of NDHA



Nevada Dental Hygienists Association
nevadadentalhygiene@gmail.com
3/23/2026

RE: Public Comment in Opposition agenda item: 6. a.v and Support for 6.a.iv

Nevada State Board of Dental Examiners

Dear Members of the Board,

On behalf of the Nevada Dental Hygienists' Association (NDHA), we respectfully submit our opposition to agenda item 6. a.v and support for agenda item 6.a.iv. As licensed providers committed to prevention, periodontal therapy, and patient safety, we believe this proposal compromises the standard of care and places the public at risk.

Periodontal disease is a chronic inflammatory condition affecting nearly 50% of the American population and is linked to systemic conditions such as cardiovascular disease and diabetes. Scaling is not a routine task but a therapeutic procedure requiring clinical judgment, disease recognition, and the ability to respond to patient-specific findings. Assigning this responsibility to an undertrained, unlicensed individual minimizes the complexity of care and increases the potential for harm.

Dental hygienists complete approximately 2,932 hours of CODA-approved formal education and clinical training, compared to roughly 200 hours in dental assisting programs. The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients. Allowing a lesser-educated, under-trained, unlicensed, and unregulated individual to perform scaling procedures lowers the standard of care and introduces risk.

This proposal has previously been presented and *rejected three times*, through the legislative process, and should continue to be addressed through appropriate legislative

channels that allow for transparency and public input. Advancing this change outside of that process raises concern. Additionally, this proposal does not resolve workforce shortages and may instead worsen them. Dental hygienists are already experiencing burnout and leaving the profession. Requiring hygienists to oversee or verify procedures performed by assistants creates inefficiency and redundancy. This proposal also creates a concerning precedent that may discourage future dental hygienists from entering the profession, as they may feel they are being asked to compete with less educated, unlicensed personnel performing similar procedures despite the significant time, cost, and rigor required to obtain a dental hygiene license.

From an operational standpoint, requiring a licensed dental hygienist to re-evaluate supragingival scaling performed by an assistant is inefficient and unnecessary. A dental hygienist is already trained and licensed to perform this procedure safely and effectively. This does not expand access to care; it complicates it. Dental hygienists are licensed, regulated, and held accountable to defined standards of care. This proposal introduces a model where procedures are performed without equivalent oversight, creating a gap in patient protection.

The NDHA supports solutions that improve access to care without compromising safety. These include pursuing a Dental Hygiene Interstate Compact to allow licensed hygienists to practice in Nevada more efficiently, increasing funding for dental hygiene education programs, and expanding assistant-assisted hygiene models within an appropriate scope. We also support modernizing practice laws by transitioning from supervision to authorization for licensed dental hygienists. This change would increase patient access, improve workflow, and enhance overall efficiency within dental practices. Under an authorization model, a dental hygienist would be able to perform procedures even when the dentist is not physically present in the office, increasing access to care and productivity. Dental hygienists are already licensed, educated, and trained providers, and this expanded autonomy could be appropriately implemented for those with one to three years of clinical experience.

In conclusion, this proposal lowers the standard of care, places patients at risk, and undermines a licensed profession. The solution to workforce challenges is not to replace licensed providers with undertrained personnel, but to invest in and support the dental hygiene workforce.

The Nevada Dental Hygienists' Association strongly urges the Board to reject this proposal and instead pursue evidence-based, patient-centered solutions that protect the public.

Respectfully,

Marvelyn Navarro, RDH – President, Nevada Dental Hygienists' Association

Dear NSDBE,

I am writing in strong support of updating the current language from “supervision” to “authorization” within the Nevada Administrative Code (NAC) and Nevada Revised Statutes (NRS) as it relates to the scope of practice for licensed dental hygienists.

Under the current statute, “supervision” requires a dentist to be physically present in the office while procedures are being performed. This requirement creates unnecessary barriers to care and limits the efficiency of dental practices, despite dental hygienists being licensed, educated, and highly trained healthcare providers.

Nevada law already recognizes the concept of **authorization**, allowing dentists to delegate procedures to dental hygienists who are qualified to perform them. Aligning the language across the NAC and NRS to reflect “authorization” rather than “supervision” would modernize our practice model, improve workflow efficiency, and allow hygienists to provide preventive and periodontal services, such as prophylaxis and periodontal maintenance, when a dentist is not physically present.

This change would:

- Increase access to care, particularly for periodontal patients in need of routine maintenance
- Improve productivity and efficiency within dental practices
- Support a strained workforce by maximizing the use of licensed providers
- Reflect advancements in modern dentistry and team-based care

Additionally, this request aligns with previously established legislative intent in Nevada, where authorization-based delegation has already been recognized within statute. Ensuring consistency between statute and regulation is both logical and necessary.

Dental hygienists are already trained and licensed to perform these procedures safely and effectively. Updating this language does not expand scope; it simply removes outdated barriers to delivering care.

I wholeheartedly support this change and urge its adoption to better serve both patients and providers across Nevada.

Thank you for your time and consideration.

Sincerely,
Marvelyn Navarro, RDH
NDHA President

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:19 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:56 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose 6a.v

From: Mary Fincher <me.finch@hotmail.com>
Sent: Monday, March 23, 2026 7:49 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am writing to oppose proposal 6 a.v that would allow an unlicensed, untrained dental assistant who is authorized by the dentist, to remove supragingival calculus, soft plaque, and stain from exposed tooth surfaces utilizing hand instruments, ultrasonic scalers, or air-polishing devices. Allowing unlicensed individuals will compromise patient care and safety. Further More it borders on being unethical and we are sworn to do no harm. Removing supragingival deposits while leaving subgingival deposits will cause periodontal disease in patients who would not have developed it if treated by a dental hygienist. As we remove supragingival and subgingival deposits, plaque and biofilm from each and every patient. There are many ethical considerations to address both the Dentists concerns and the dental hygienists' concerns, however, comprising patient care and safety IS not the answer. The following suggestions are some ways the Dentists and Hygienists could come together to address these concerns.

- Approve the dental and dental hygiene compact (this would allow hygienists to move to Nevada with fewer obstacles when transferring their license across state lines).
- Campaign to increase funding to our existing dental hygiene programs to increase the number of graduating students each year.
- Train dental offices to utilize the assisted dental hygiene model.
- Eliminate supervision for dental hygienists, which would allow us to provide healthcare services to underserved rural populations who do not have access to a dental office.

I urge you to put the health and safety of your patients above your bottom line. I urge you to remember your responsibility as a healthcare professional the treat your patients ethically and allow them to receive the highest quality care they deserve by a licensed Dental Hygienist.

Mary Fincher RDH

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Nevada State Board of Dental Examiners
Public Board Meeting March 25, 2026
Written Testimony
OPPOSE NEW Agenda Item 6.a.iv – NAC 631.210
SUPPORT NEW Agenda Item 6.a.v – NAC 631.220

Dear Nevada State Board of Dental Examiners,

My name is Mary Teresa (Terri) Chandler, RDH, (RDH #3420), and I have been a practicing dental professional in Nevada, since 1984. My career in dentistry began as a certified dental assistant, expanded function dental auxiliary, and in 1999, I became a licensed dental hygienist. As the NSBDE agenda items pertain to both the roles and responsibilities of dental assistants and dental hygienists, these are the focus areas of this written testimony.

I am in SUPPORT of NEW Agenda Item 6.a.iv – NAC 631.210.

KEY POINTS:

- This is not independent practice for dental hygienists. It will require a bona fide relationship with a dentist/employer at the practice where the dental hygienist works.
- This expands the collaborative practice model for both the dentists and the dental hygienists.
- In a mutually respectful relationship, dentists and dental hygienists establish trust and confidence in each other's professional training and standard of care. Ultimately, the final decision to approve authorization for the dental hygienist falls to the dentist as the practice owner. Currently, under NAC 631.210, a dental hygienist can treat a patient of record with an examination within 18 months, without the dentist being present in the office. The only real preclusion would be administering anesthesia and laser treatment.
- There are many instances when the dentist might not be in the office and could authorize the dental hygienist to perform treatment for a patient of record. Services could include prophylaxis and administering anesthesia for scaling and root planning.
- Not only will authorization create more dental hygiene scheduling opportunities for the public, but it will also improve access to care across the State.

As a former dental assistant, I can attest that our role is to be the practice timekeeper, support the dentist's rendering of treatment, ensure the schedule is kept on time, triage and assess dental patients, serve as the primary sterilization technician, and serve as the inventory and supply lead. Dental assistants fill a critical role in the practice and experience a very busy workday filled with multiple duties. Within this current structure, I'm not sure how the dentist (employer) can provide in-office training for the dental assistants to add on dental hygiene duties to include supra-gingival scaling, stain removal, and plaque removal with proficiency in

highly skilled equipment, like using ultrasonic scalers, hand instruments, rotary cup coronal polisher and air polishers.

I OPPOSE NEW Agenda Item 6.a.v – NAC 631.220 until there are more details surrounding how this “special endorsement” for dentist to conduct an in-office dental assistant scaling training program. How will this program be administered? What are the education standards? How will dentist(s) be monitored for consistency with the program design, and how will they be regulated and governed by the NSBDE?

KEY POINTS:

- Has there been a survey of Nevada dental assistants to determine whether this vital workforce is even interested in taking on additional roles and responsibilities, including supragingival tooth scaling?
- Will there be time requirements for the dentist's in-office training?
- Will the training be conducted after hours and on weekends to avoid disrupting the practice's regular workflow? How will the training be reported to the NSBDE prior to the “special endorsement” certificate is issued to the dental assistant.
- Will the NSBDE require registration of scaling dental assistants and charge a biennial licensing/certification fee, as it does for other licensees in the State?
- Will Malpractice Policies cover services rendered by the dental assistants who are scaling the patient’s teeth?
- Will dental insurance plans recognize the dental assistant scaling of the patient’s teeth as a standard D1110 – adult prophylaxis or D1120 – child prophylaxis?
- Will there be a need for a new CDT code that correctly defines the dental assistant scaling of supragingival calculus, plaque and stain?
- How much training will be required before the supragingival scaling is billable to the public?
- Will there be annual CPR and CEU requirements?

Respectfully submitted,



Mary Teresa (Terri) Chandler, RDH
(702) 521-4550
tchandlerrdh16@gmail.com

Nevada State Board of Dental Examiners
Public Board Meeting March 25, 2026
Written Testimony

Dear Nevada State Board of Dental Examiners,

As the Founder and CEO of Future Smiles (a 501(c)(3) nonprofit), Mary Teresa (Terri) Chandler, RDH, it has been my honor to administer Future Smiles over the last 17 years. My experience with the Public Health Dental Hygiene Endorsement (PHDHE) and approved public health program protocols are the focus of this written testimony.

Future Smiles began as a school-based sealant program and, to this day, our MOBILE program travels to 75 schools providing caries risk assessment, screenings, sealants and fluoride varnish. Our target population are low-income children who attend Title I schools. On average, 50% are enrolled in Medicaid and 50% are uninsured. Survey data reveal that our families have an average of 5 members with an average monthly income of \$1,960. After program services, a communication letter is sent home with each child, outlining the services provided, areas of concern, and listing community dental providers that accept Medicaid or offer sliding fees for low-income families. In addition, our case managers contact parents to assist with Medicaid enrollment and care navigation to a dental provider.

Under NRS 631.34583(b) (1-3), there are guidelines for “public health program” locations. But where it is unclear regarding “program approved by the Board,” does this mean that all PHDHE programs could open a brick-and-mortar? It is important for the NSBDE to clearly identify the brick-and-mortar locations to be utilized as a PHDHE public health program and for telehealth.

Furthermore, it must be emphasized that diagnostic services, x-rays, and comprehensive examinations are solely intended to render treatment for dental disease. If public health programs expand their scope to include diagnostics but only refer patients to other dental providers, this leaves the public without follow-up care. Diagnostics without actual restorative services absorb the Medicaid dental benefit for x-rays and comprehensive examinations, and are a disservice to the public. The NSBDE needs to establish clear guidelines for public health programs regarding program capacity and the lawful expectation for fair, ethical care for the public, particularly the Medicaid population.

Under NRS 631.34583 (b) 1-3,

(b) “Public health program” means a program approved by the Board or any program administered by:

- (1) The Department of Health and Human Services;
- (2) A health district; or
- (3) A school district.

According to the NSBDE website, there are currently 2,457 licensed Nevada Dentist. The Nevada Department of Analytics posts ongoing data (dashboard from August 2025) regarding Medicaid trends for providers and active participants. Across the state, there are 467 active providers, of which 363 are in Clark County. Of all the licensed dentists across the state, only 19% are contracted Medicaid providers who actively treat this specific population.

The dashboard also reports that there are 36,519 active recipients, of whom 29,078 (84%) reside in Clark County. Children under the age of 21 make up the biggest user population with 28,766 (80%) across the state and, of these, 22,519 (78%) reside in Clark County. The 2024 Q1 Dental Overview Quarterly Reports reveal that, on average, only 9% of the enrolled Medicaid members received dental treatment.

I share this data with the NSBDE to illuminate one simple truth: most dentists (81%) in Nevada are not contracted with Medicaid, nor do they actively treat the Medicaid population. The PHDHE programs offer a unique solution for access to care within the Medicaid population; however, case management, navigation to a “dental home,” and tracking this navigation would be difficult for many of these small programs. Furthermore, the requirement for annual reporting and referral-tracking data would pose an administrative challenge for both the programs and the NSBDE staff. Providing a list of local dental sources that accept Medicaid or offer sliding-fee discounts is a reasonable expectation for public health programs to provide to the public they serve.

KEY POINTS

- NRS 631.287 Special endorsement of license to practice public health dental hygiene (PHDHE): The law authorizes a dental hygienist, under NSBDE-approved public health protocol, to serve the public without authorization or supervision from a dentist.
 - These typically include mobile, portable, and pop-up program delivery models.
 - Can a brick-and-mortar facility also be under public health program operations?
 - Can a telehealth comprehensive examination by a dentist be incorporated into the public health protocol?
 - There needs to be safeguards for the public regarding Medicaid utilization, especially when diagnostic services, x-rays, and comprehensive examinations are performed by a dentist. The dentist conducting the examination also needs to provide follow-up treatment after the examination, otherwise this would be considered patient abandonment.

- A dental screening is a preliminary evaluation of the mouth to identify potential oral health issues and to prescribe preventive treatments, sealants, and fluoride varnish. All public health programs should provide parents with information about the services provided and follow-up care. Community dental resources are provided that identify local Medicaid and sliding fee dental providers. At the time of biennial license renewal, programs are required by the NSBDE to document each PHDHE provider's two-year list of services provided within the public health program. However, additional population data, completion of care, and other annual data collection required for reporting to the NSBDE would constitute an administrative hardship for public health programs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mary Teresa Chandler". The signature is fluid and cursive, with a large initial "M" and "T".

Mary Teresa (Terri) Chandler, RDH
(702) 521-4550
tchandlerdh16@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:57 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:57 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda Item 6.a.v

From: Melissa Guerrica <melissaguerrica@gmail.com>
Sent: Monday, March 23, 2026 8:13 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

As a native Nevadan and a 20-year career dental hygienist, I am writing to adamantly oppose Agenda item 6.a.v. In the state of Nevada, registered dental hygienists undergo a rigorous formal education program that provides them with the knowledge, skills, and clinical practice whereby they can become LICENSED professionals. Professionals who ascribe to a strong code of ethics and who bear an accountability to serve the public with the highest standard of care. In addition to a rigorous series of didactic learning, registered dental hygienists undergo a demanding clinical regimen, accruing nearly 2900 hours of clinical practice. That is a far cry from the unregulated supervisory hours an expanded function assistant would reportedly be required to complete. Additionally, registered dental hygienists' value of service far exceeds simply placing an instrument to a tooth's surface. Dental hygienists are healthcare professionals, well learned in head and neck anatomy, pharmacology, systemic disease, and biological processes. We serve to diagnose and treat disease and ultimately improve the systemic health of our patients. This proposal is a danger to the health of Nevadans. The price to be paid for this proposal will be paid for by the public, Nevadans who will suffer a degrading reduction in the standard of care, and for whom I can imagine the amount of undiagnosed and untreated disease will create further ramifications. Additionally, this proposal blatantly opens the door for misappropriation, misuse, and abuse. I question how the Board intends to administer the appropriate and rigorous regulation of its implementation.

I would instead propose that the Board approve the dental hygiene compact, thereby facilitating the transfer of licenses across state lines and allowing for an influx of dental hygienists. I encourage the Board to seek an increase in funding and support for Nevada's current dental hygiene programs, thereby allowing a greater number of graduating students each year. Additionally, eliminating supervision for dental hygienists allows for greater access to care for underserved populations. And finally, dental practices can implement an assistant hygiene model of care, thereby utilizing the assistant and the hygienist within their scope of practice and without compromising the standard of care.

I hope that the Board will see the disservice to Nevadans this proposal will create. Standards of care should not be compromised for the sake of convenience.

Thank you for your time,

Melissa C Guerrica, RDH, BA
(License #101501)

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:04 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSING AGENDA ITEM 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:57 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: OPPOSING AGENDA ITEM 6.a.v

From: Melody Perry <melodystudentdh@gmail.com>
Sent: Monday, March 23, 2026 8:08 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSING AGENDA ITEM 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good evening,

My name is Melody, and I am in opposition of Agenda Item 6.a.v. I am currently a Dental Hygiene student, halfway through the program, with ~10 years of dental assisting experience. My insight into both roles and their education requirements makes me deeply concerned about the negative impacts of Agenda 6.a.v on patient health.

Before entering my program, I attended a trade school for dental assisting, then gained broad work experience in the field. Despite this, the advanced education and clinical training required for the dental hygienist are essential for providing sufficient patient care. Shortcuts would compromise patient health.

Allowing dental assistants to scale supragingivally will negatively impact patient health, as only the removal of both sub/supragingival calculus is required to promote a healthy periodontium. I also feel the need to mention that the same concept of this agenda was proposed 3 previous times and was denied

every time. Nevadans and Hygienists have spoken; we cannot allow patients' oral health to be compromised.

I understand the concern about the current shortage of dental hygienists in Nevada. I suggest eliminating the supervision for dental hygienists. Hygienists are providers in healthcare, and this will allow them to be able to work in underserved rural areas that do not have access to care. Thus, reaching a greater patient population.

I urge you to deny Agenda 6.a.v to protect our fellow Nevadans from receiving substandard care.

Sincerely,

Melody Perry, *Dental Hygiene Student*

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:19 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:56 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose 6.a.v

From: Michelle Twichell <mtwich@icloud.com>
Sent: Monday, March 23, 2026 7:51 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Board of Dental Examiners,

As a registered dental hygienist with 37 years of experience, I strongly oppose proposal 6.a.v.

This concept has already been rejected by the legislature three times, largely due to public concern about allowing individuals to perform the duties of licensed dental hygienists through minimal on-the-job training. Periodontal disease requires proper assessment and clinical judgment developed through formal education and training. Allowing inadequately trained personnel to perform these procedures increases the risk of undiagnosed disease and could expose providers and the Board to potential liability.

There are also concerns regarding transparency and insurance implications. Will patients be informed if their prophylaxis is not being performed by a licensed professional? Additionally, will insurers begin to reimburse at lower rates if supragingival cleanings are viewed as partial prophylaxis procedures?

While workforce shortages are a challenge, there are safer and more appropriate solutions than lowering professional standards and potentially putting the public at risk.

Sincerely,

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:14 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:18 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Mindy Smerski
Sent: Sunday, March 22, 2026 9:29 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Mindy Smerski
3714 Valley Ridge Ave
Elko, NV 89801
mindysmerski@gmail.com

March 22, 2026

Dear NSBDE,

For the record, my name is Minette Galura-Boquiren and I reside in Las Vegas. I am a dental hygienist that has worked both in a DSO and in private practice for the last 10 years.

I am in opposition for March 25th agenda item 6 a.v. that would allow for dental assistants to scale supragingival calculus. Currently, there is no regulation or licensure of dental assistants in the State of Nevada at all. Therefore, a dental assistant could be one that completed an accredited dental assisting program, or they could have a background working in any industry, such as retail or food, with no prior dental experience. I know this because I have personally worked with dental assistants with similar prior work experiences. One dental assistant previously worked at Victoria's Secret while the other worked at McDonald's. Neither dental assistant knew the names of the tooth surfaces, tooth numbers, or tooth anatomy.

More importantly, dental assistants do not have over 2900 hours of clinical training like a dental hygienist to be able to effectively and safely remove calculus. It is a disservice to patients by allowing sub-standard care as well as a potential harm to patients, if the NSBDE allows for dental assistants to scale without proper education and training.

Instead to better serve Nevadans, I am in favor of license portability to allow for more dental hygienists to move to Nevada to be able to practice. I also support the elimination of supervision of dental hygienists by dentists to allow for further access to care for patients. And lastly, I am in support of further funding of dental hygiene programs in our state to allow for more dental hygienists to enter and graduate from programs.

Thank you for this opportunity to submit my testimony and for your kind consideration.

Sincerely,

Minette Galura-Boquiren, BS, RDH
NV license #102189

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:51 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:29 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

-----Original Message-----

From: Monica Estrada <estrada0510@gmail.com>
Sent: Tuesday, March 24, 2026 11:15 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners, My name is Monica Estrada and I am a concerned patient and Nevada resident residing in Henderson. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v. Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care. Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions. Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model. Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v. Thank you for your time and for protecting the health of our community.

Sincerely,
Monica Estrada
Estrada0510@gmail.com

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:48 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:36 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Nicole Heckman
Sent: Monday, March 23, 2026 9:40 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

Please note my record of opposition of the proposal to agenda item 6.a.v.

In addition to it being completely unethical to pass this agenda, it is ridiculous to imagine a dental hygienist or dentist to have the time and opportunity to step in to take over a cleaning taking place by a hygiene assistant. I would not do it as a dental hygienist. I also feel that by passing this action, it will push some quality hygienists out of practice; which would not benefit the cause. I cannot see any benefit from passing the agenda. It would add chaos to the practice, added stress to the patients and staff, as well as providing zero benefit of improved oral health if one were unable to clean subgingivally and in areas of inflammation. The agenda makes no sense. It would be incredibly risky to have an untrained clinician attempting to provide adequate patient care. It is truly mind blowing that this action is even up for discussion and is being pushed so hard by dentists. It is very hard to understand.

Thank you for reconsidering this agenda and maintaining high ethical standards for the dental and dental hygiene professions.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Nicole Heckman
327 Corbett St Unit 1
Carson City, NV 89706
nikkismilesheckman74@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:06 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSING agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:29 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: OPPOSING agenda item 6.a.v

From: oxana Baertschiger <oxanabaertschiger@hotmail.com>
Sent: Sunday, March 22, 2026 10:48 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSING agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

Dear Members of the Board,

I am writing to formally express my opposition to agenda item 6.a.v, any proposal that would allow dental assistants to perform supragingival scaling in the state of Nevada. This concern is rooted in the need to protect patient safety, uphold the standard of care, and preserve the integrity of the licensed dental hygiene profession.

While supragingival scaling may appear to be a limited procedure, it cannot be separated from the broader clinical context of periodontal health. Effective prevention and management of periodontal disease require comprehensive assessment and removal of both supra- and subgingival calculus. Limiting care to supragingival scaling alone risks leaving pathogenic deposits beneath the gumline, which can contribute to ongoing inflammation, disease progression, attachment loss, and ultimately tooth loss. Patients may mistakenly believe they have received appropriate treatment, creating a false sense of security and delaying necessary care.

Licensed dental hygienists are extensively educated and trained not only in instrumentation, but also in anatomy, periodontology, radiographic interpretation, and clinical decision-making. This depth of training allows hygienists to assess periodontal conditions, identify disease, and determine appropriate treatment. Dental assistants, while valuable members of the dental team, do not receive the same level of education or clinical preparation to safely perform scaling procedures or evaluate periodontal health.

There are also significant concerns regarding patient safety and quality of care. Improper instrumentation techniques may lead to gingival trauma, incomplete calculus removal, or burnished deposits, all of which can negatively impact patient outcomes. Additionally, without the ability to assess periodontal pocketing, attachment loss, or early signs of disease, there is an increased risk that pathology will go undetected.

From an ethical and regulatory perspective, expanding scaling duties to dental assistants lowers the established standard of care and prioritizes convenience over patient health. It may also increase liability risks for supervising dentists and practices if patients experience disease progression due to incomplete or inappropriate treatment.

Furthermore, periodontal disease is closely linked to systemic health conditions, including diabetes and cardiovascular disease. Inadequate oral care may contribute to broader health complications, particularly among vulnerable populations who already face barriers to accessing comprehensive dental services.

If access to care is the primary concern, there are more appropriate and evidence-based solutions. Expanding opportunities for licensed dental hygienists to practice in public health settings, increase findings to our existing dental hygiene school to increase the number of graduating students each year and allow dental hygienists to transfer their dental hygiene license to Nevada with fewer obstacles. In conclusion, allowing dental assistants to perform supragingival scaling does not address the underlying challenges in access to care and instead introduces significant risks. Maintaining this procedure within the scope of licensed dental hygienists is essential to ensuring safe, effective, and comprehensive patient care.

Thank you for your time.

Sincerely,

Oxana Baertschiger RDH

Sent from my iPhone

3-23-26

To: NSBDE,

I am a licensed Dental Hygienist in Nevada and I am writing this letter to oppose the Agenda Item 6.a.v.

This is not the way to any shortage problems, it is a way to let under trained and under educated assistants to do a job that requires more than what they can offer. It provides a danger to the public by doing an incomplete service and does not promote the necessary treatments required to stop periodontal (gum)disease. This same legislation has been proposed and defeated 3 times previously and what we need in this state is a draw for more hygienists and the schools to educate them not to discourage them by having this take place.

I am also for approving and support agenda item 6.ai.v for changing the RDH supervision language to: **without the supervision of the dentist**. This will allow **more access to care for the underserved**.

**Please consider my letter and sincere thoughts on these items and Oppose agenda item 6.a.v
And Support 6.ai.v.**

**Respectfully,
Patricia Lee Anderson, RDH, BS
NV License #2243**

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:26 PM
To: Rebekah Vanleer
Subject: Fw: Statement Regarding Agenda Items 6.a.iv and 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:53 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Statement Regarding Agenda Items 6.a.iv and 6.a.v

From: Regi Ann <ginabaila@gmail.com>
Sent: Monday, March 23, 2026 6:29 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Statement Regarding Agenda Items 6.a.iv and 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Board Members and Lawmakers,

My name is Regina Lwin, and I am a Registered Dental Hygienist practicing here in Las Vegas. I am writing to formally oppose agenda item 6.a.v and express my strong support for agenda item 6.a.iv. It can be difficult for those outside the dental field to fully grasp the clinical value and complexity of what a dental hygienist does. Even I, before entering the profession, underestimated the rigor required; however, I quickly learned that the role is far more demanding than I ever anticipated.

In many ways, hygienists are the "nurses of dentistry." Just as a hospital would never replace licensed nurses with on-the-job trained assistants, the dental field requires the specialized education and licensure that hygienists provide to ensure patient safety and effective care.

Instead of devaluing the role, we should be focused on two things:

- Expanding the scope of the RDH: Utilizing our full clinical potential to improve patient outcomes.
- Streamlining licensure reciprocity: We should make it easier for qualified hygienists to move to Nevada by reducing redundant testing and excessive fees. This addresses the workforce shortage without compromising the quality of care.

Finally, I strongly encourage the decision-makers behind these laws to tour our local dental hygiene schools. Seeing the intensity of the curriculum and clinical training firsthand is essential before making any decisions that would fundamentally change our profession.

Thank you,

Regina Lwin

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:09 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:20 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Regina Lwin
Sent: Sunday, March 22, 2026 10:08 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

Who do you want using sharp instruments in your mouth?

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines

these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Regina Lwin
11620 Desert Hollow Ave
Las Vegas, NV 89138
ginagenni@yahoo.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:16 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:38 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Renee Irvine
Sent: Monday, March 23, 2026 12:44 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Renee Irvine
3186 Crooked Ct
Elko, NV 89801
rirvine10@hotmail.com

I am submitting this comment in opposition of the proposed regulation 6.a.v allowing dental assistants or EFDAs to perform supragingival scaling. From a public health perspective, expanding the scope of minimally trained personnel to include a procedure central to preventive oral care presents clear risks to patient health and quality of care. Supragingival scaling is not a purely mechanical task; it requires clinical judgment, recognition of pathological conditions, and the ability to respond appropriately to complications. Delegating this procedure to assistants without the education and licensing of a hygienist could result in substandard care and missed early disease detection.

Allowing dental assistants to perform this work also risks creating confusion for patients about the qualifications of their healthcare providers. Clear disclosure should be required, and patients should understand that assistants are not licensed hygienists. Furthermore, expecting licensed hygienists and dentists to check or oversee assistants' work introduces professional liability that could compromise care delivery. It is also unrealistic to expect this requirement to be carried out as intended due to the hectic and often overloaded patient schedules of both dentists and hygienists.

Finally, adequate supervision by dentists must be ensured. Without clear limits on the number of assistants a dentist may oversee, supervision could become nominal, further compromising patient safety. For the protection of patients and the integrity of preventive oral health services, **I urge the Board to delay or reject this expansion** until proper education, competency programs, and supervision safeguards are fully established.

I am writing in support of the proposed expansion 6.a.iv allowing licensed dental hygienists to practice within their scope without direct supervision of a dentist. Allowing hygienists to operate independently within their licensed scope improves the efficiency of dental practices and optimizes patient care during office hours. Many offices have periods when a dentist is unavailable—yet preventive and periodontal care services such as prophylaxis, scaling and root planing, periodontal maintenance, assessments, and patient education remain essential.

Expanding hygienist autonomy allows offices to fully utilize available staff, reduce bottlenecks, and ensure that patients receive timely care without unnecessary delays. Expanding hygienist autonomy is a critical step toward improving public health and increasing access to preventive oral care. Many communities—particularly rural or underserved areas—face limited availability of dentists, which can delay essential dental hygiene procedures. Allowing hygienists to practice independently ensures that patients can receive timely, preventive and periodontal care, reducing the risk of more serious oral health problems and associated systemic health issues.

Licensed dental hygienists are highly trained professionals who are already accountable to the Board and held to rigorous clinical standards. Allowing them to utilize their full scope of practice safely expands access to care while maintaining quality standards and protecting patient health. It benefits both patients and practices by improving scheduling flexibility and workflow efficiency, especially in high-demand or underserved areas. For these reasons, I strongly support this proposed expansion and encourage the Board to adopt it to allow hygienists to fully utilize their expertise for the benefit of patients and practices alike.

Thank you for your consideration,
Rhiannon Stang, RDH BSDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:23 PM
To: Rebekah Vanleer
Subject: Fw: Public Comment for Board Meeting 3/25/26

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:43 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Public Comment for Board Meeting 3/25/26

From: Samantha Sturges <ssturgesrdh@gmail.com>
Sent: Sunday, March 22, 2026 12:06 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Public Comment for Board Meeting 3/25/26

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

March 21, 2026

Nevada State Board of Dental Examiners
2651 N. Green Valley Pkwy, suite 104
Henderson, NV 89014

Re: Formal Public Comment on Agenda Items 6a.iv and 6a.v — Patient Safety and Scope of Practice

Dear Members of the Nevada State Board of Dental Examiners:

I am writing to you as a licensed dental hygienist practicing in Nevada, with deep commitment to the oral and systemic health of our patients and communities. After careful review of the proposed regulatory changes on your current agenda, I respectfully submit formal comment in support of Agenda Item 6a.iv, which would reduce direct supervision requirements for dental hygienists, and in strong opposition to Agenda Item 6a.v, which would expand the functions of dental assistants to include scaling procedures.

These two proposals, considered together, represent a pivotal moment for the future of oral healthcare in Nevada. One has the power to meaningfully expand access to care. The other, I believe with great urgency, poses a genuine risk of patient harm. I urge the Board to weigh both with the gravity they deserve.

I. SUPPORT: Agenda Item 6a.iv — Reducing Direct Supervision Requirements for Dental Hygienists

Nevada dental hygienists complete a minimum of two years of post-secondary education, pass both national and state board examinations, and maintain continuing education requirements throughout their licensure. We are independently accountable professionals — not auxiliary personnel — trained to assess, diagnose, and treat the full range of periodontal conditions. The current direct supervision requirement does not reflect this reality. It constrains our ability to serve patients and imposes structural barriers that have no foundation in patient safety evidence.

Expanding Access to Underserved Nevadans

Nevada has significant rural and frontier populations where access to dental care is chronically limited. In many communities, there is no dentist on-site at the times when hygienists are available to provide services — in schools, long-term care facilities, community health centers, and mobile clinics. The direct supervision requirement, as currently written, effectively prohibits care in these settings. Reducing that requirement would allow licensed hygienists to deliver preventive and therapeutic services where patients live and where need is greatest. This is not a theoretical benefit; it is a demonstrable, immediate public health gain.

Aligning Nevada with the National Standard

The majority of U.S. states already permit dental hygienists to practice under general or indirect supervision, or in certain settings with no supervision requirement at all. States including California, Colorado, Minnesota, and Oregon have implemented expanded hygienist practice models without evidence of patient harm and with documented improvement in access to care. Nevada's continued reliance on direct supervision places us behind the national standard and disadvantages both patients and practitioners. Modernizing this requirement is an overdue alignment with evidence-based workforce policy.

No Compromise to Patient Safety

A licensed dental hygienist is a licensed dental hygienist regardless of whether a dentist is physically present in the building. Our clinical judgment, our legal accountability, and our professional obligations to patients do not disappear in the absence of a supervising dentist. We are trained to identify conditions beyond our scope and to refer appropriately. Reducing direct supervision requirements does not reduce the standard of care — it extends it to people who currently receive none.

II. OPPOSITION: Agenda Item 6a.v — Expanding Dental Assistant Functions to Include Scaling

I oppose Agenda Item 6a.v with equal conviction, and I ask the Board to consider carefully the clinical and public health consequences of this proposal. The expansion of dental assistant functions to include scaling is not a workforce solution. It is a patient safety risk disguised as one.

Dental Assistants Are Not Clinically Equipped to Perform Scaling

Dental assistants perform a vital role in the dental office, and that role should be valued. But their education and training are categorically different from that of a dental hygienist. Scaling is not a mechanical task — it is a clinical procedure that requires the ability to assess tissue health, probe pocket depths, identify calculus morphology, distinguish healthy tissue from diseased tissue, and respond appropriately to what is found. Dental assistants do not receive this training. They are not licensed to assess periodontal health. Authorizing them to perform scaling without the clinical foundation to interpret what they are treating is not scope expansion; it is scope confusion, and it puts patients at risk.

Supragingival Scaling Alone Is Inadequate Treatment for Periodontal Disease

The proposal, as described, would limit dental assistants to supragingival scaling — removal of deposits above the gumline. This limitation is not a safeguard. Periodontal disease does not exist above the gumline. By definition, it is a condition of the sulcus and the supporting structures: the gingival tissue, the periodontal ligament, the cementum, and the alveolar bone. Subgingival calculus and bacterial biofilm are the primary drivers of disease progression. Scaling that cannot access the subgingival environment is not treatment for periodontal disease nor does it prevent it — it is, at best, a cosmetic procedure.

Periodontal Disease Is Prevalent, Progressive, and Consequential

This is not an abstract concern. Periodontal disease, including gingivitis, affects an estimated 60 to 80 percent of the population at some stage. It is the leading cause of adult tooth loss in the United States. Left unidentified or inadequately treated, it progresses silently — destroying bone, destroying attachment, and ultimately destroying the dentition. The systemic implications are well-established and serious: periodontal disease is associated with increased risk of cardiovascular disease, poorly controlled diabetes, adverse pregnancy outcomes, and respiratory infections.

What periodontal disease requires is early identification by a trained clinician, accurate staging and grading, and appropriate therapeutic intervention. What it cannot survive — without progressing — is mismanagement or the appearance of treatment in the absence of actual treatment.

The Risk of False Treatment Completion

This brings me to what I consider the most dangerous consequence of Agenda Item 6a.v: the false sense of treatment completion it may create. When a patient receives a scaling procedure from a dental assistant — even if that procedure is supragingival only — there is a reasonable and natural expectation that their teeth have been cleaned, that their disease, if any, has been addressed. Patients do not know what they do not know. If a dental assistant performing limited scaling fails to identify or communicate active periodontal disease — because they lack the training to do so — the patient may leave believing they are well when they are not. Providers may document a procedure completed while disease continues unchecked. The result is not a neutral outcome. It is a worse outcome than no treatment at all, because the window for early intervention closes without either patient or provider recognizing it.

Patient Safety Must Not Be Traded for Workforce Convenience

I understand that workforce pressures are real. I understand that cost and access are legitimate concerns in dental public health planning. I share those concerns deeply. But the answer to workforce challenges cannot be the delegation of clinical procedures to providers who are not clinically trained or licensed to perform them. If the goal is to extend dental care to more Nevadans, the appropriate pathway is the one already before this Board: expand the practice autonomy of licensed, trained, accountable dental hygienists. Do not create a new category of inadequately supervised clinical risk.

III. CLOSING STATEMENT

The Nevada State Board of Dental Examiners has an opportunity with these two agenda items to make a meaningful and lasting difference in the oral health of Nevada's communities. I urge you in the strongest possible terms to pass Agenda Item 6a.iv — because it is sound policy, grounded in evidence, aligned with national best practice, and it will bring care to Nevadans who currently go without it. And I urge you with equal urgency to reject Agenda Item 6a.v — because it is not a solution to access, it is a risk to safety, and the patients it purports to serve deserve better.

We have spent our careers at the intersection of prevention, education, and care. We know what periodontal disease looks like in its earliest, most treatable stages. We know what it looks like when it has been missed. The Board has the power to ensure that trained, licensed, accountable dental hygienists are the ones providing that care across Nevada — and to ensure that the patients of this state are not subjected to the risk of undertreated disease in the name of cost efficiency.

I respectfully and urgently ask this Board to act in the interest of Nevada patients. Pass 6a.iv. Reject 6a.v.

Thank you for your time, your service, and your commitment to the public trust.

Respectfully submitted,

Samantha Sturges, RDH, BS

License No. 101646
Las Vegas, NV 89179
ssturgesrdh@gmail.com
702-308-7729

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:55 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSING

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:58 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: OPPOSING

-----Original Message-----

From: Sandra Brotherson <cleanteethforu@icloud.com>
Sent: Monday, March 23, 2026 8:26 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSING

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello, my name is Sandra Unyen-Brotherson, I am a RDH, license # 101572.
I vote to oppose the bill allowing assistants to scale patients.

Thank you

Sandra Unyen-Brotherson

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:50 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:30 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: Nimetz Sin <nimetzsin@gmail.com>
Sent: Tuesday, March 24, 2026 11:26 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Senimetz Sin and I am a Nevada resident residing in Henderson. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our

existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Senimetz Sin

nimetzsin@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:10 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:20 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Shaedyn Mann
Sent: Sunday, March 22, 2026 9:58 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

Every patient I tell about this are disgusted with dentists and their lack of care for patients overall health. Its disrespectful to dental hygienists but even more disrespectful to our patients because we all know that the dentists will take every opportunity to have assistants work outside of their scope and call it a prophylaxis when it's nothing more than a lazy gross debridement money grab. This doesn't benefit the patient, it only benefits cheap greedy dentists who disrespect the hygiene profession more than anywhere in the three states I'm licensed in. The patients will have no idea they are getting an incomplete cleaning and we are compromising their oral systemic health. My colleagues in other states laugh at Nevada, we are the joke amongst quality providers for even considering this.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Shaedyn Mann
4537 Barnes Ct
Las Vegas, NV 89147
shaedyn.mann@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:45 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to Agenda item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 12:37 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to Agenda item 6.a.v

From: Sharlin Clark <sharlinclark@gmail.com>
Sent: Monday, March 23, 2026 10:10 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to Agenda item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

My name is Sharlin Clark from Henderson NV. I am a licensed RDH in NV working in a General Practice.

I OPPOSE Agenda item 6.a.v.

- It is not safe to allow unlicensed, under-trained assistants to supragingival scale with scalers both manual and power.
- They would not have extensive knowledge of anatomy or the etiology of disease to best treat a patient.
- The standard of care to screen for many Overall Health related issues would be compromised/NOT DONE. Untrained dental assistants could put the health of a patient at risk for harm when they do not know the connection of Medical History flags and procedures that should not be performed on certain patients.
- This Lowers the Standard of Care
- This Will Impact Public Trust.
- This has already Failed NV Legislation 3 times, clearly the people are against this.

I have saved people's lives over my 20+ year career because of my extensive education and care for the people I treat daily. I am passionate about keeping up on my knowledge of current research and sharing that with those I care for. And I improve my standard of care as I learn. The public deserves what we as Registered Dental Hygienists have to offer them.

Thank you for considering my Opposition to item 6.a.v.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:04 PM
To: Rebekah Vanleer
Subject: Fw: I oppose 6 AV

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:56 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: I oppose 6 AV

-----Original Message-----

From: Sharon fzjackson <sharonfzj@gmail.com>
Sent: Monday, March 23, 2026 8:03 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: I oppose 6 AV

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Allowing dental assistants to scale teeth with minimal training by an employer dentist who then certifies that they are safe is insanity. There is an obvious conflict of interest. The employer wants to offer the service that he makes money on which affects the bias of his or her judgment. Not only is supra gingival scaling only half the job and isn't therapeutic but this lowers the standard of care that YOU the board established as necessary to perform any dental hygiene to obtain a license. This will lead to poor outcomes for patients that you're entrusted as a board member who are sworn to protect. Sincerely Sharon Jackson RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:48 PM
To: Rebekah Vanleer
Subject: Fw: AKDHA - Nevada State Board of Dental Examiners (AGENDA ITEMS: 6.a.v & 6.a.iv)

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:31 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: AKDHA - Nevada State Board of Dental Examiners (AGENDA ITEMS: 6.a.v & 6.a.iv)

From: ALASKA DENTAL HYGIENISTS' ASSOCIATION <alaskas.dha@gmail.com>
Sent: Tuesday, March 24, 2026 11:41 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: RE: AKDHA - Nevada State Board of Dental Examiners (AGENDA ITEMS: 6.a.v & 6.a.iv)

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Nevada State Board of Dental Examiners,

The Alaska Dental Hygienists' Association (AKDHA), is writing the Nevada State Board of Dental Examiners' to formally oppose agenda item 6.a.v and to express strong support for agenda item 6.a.iv on March 24, 2026.

Agenda item 6.a.v proposes expanding the scope of practice to allow unlicensed and insufficiently trained dental assistants to perform supragingival scaling—removing supragingival calculus, soft plaque, and stain from exposed tooth surfaces using hand instruments, ultrasonic scalers, or air-polishing devices—contingent upon receipt of a Board-approved temporary special endorsement.

This proposal represents a fundamental departure from established regulatory standards grounded in CODA-accredited dental hygiene education, clinical competency, and licensure. Supragingival scaling is a core component of the dental hygienist scope of practice and is inseparable from the clinical judgment required to assess oral conditions, identify disease, and determine appropriate care.

Reassigning this procedure to unlicensed personnel with abbreviated training pathways is not a neutral adjustment—it is an expansion of scope without the corresponding education, licensure, or accountability required to ensure patient safety. Scope of practice is not defined by task alone, but by the depth of education and clinical decision-making that supports it. Removing that foundation erodes the very purpose of licensure and weakens the regulatory framework designed to protect the public.

Regulatory bodies are charged with upholding standards—not redefining them downward. Proposals that shift licensed clinical responsibilities to unlicensed individuals create a precedent that undermines professional accountability, blurs scope boundaries, and introduces long-term risk to both patient care and public trust.

In contrast, agenda item 6.a.iv appropriately advances access to care by allowing licensed dental hygienists in Nevada to practice “without the supervision of a dentist.” Expanding access through the utilization of licensed providers—rather than substituting unlicensed personnel into clinical roles—reflects sound, evidence-based policy.

State dental boards serve as a critical safeguard between regulatory change and potential public harm. Decisions made in this forum extend beyond state lines and influence national standards. The Alaska Dental Hygienists’ Association respectfully urges the Nevada Dental Board to REJECT agenda item 6.a.v to preserve the integrity of dental hygienist licensure and scope of practice, and to ADVANCE agenda item 6.a.iv as a responsible, patient-centered approach to improving access to care.

The pathway to improved access to care is not through the substitution of unlicensed dental assistants into “temporary special endorsement” clinical roles. It is through the full utilization of educated, licensed dental hygienists. Any effort to redefine this standard represents a fundamental shift away from evidence-based policy and toward workforce models that compromise the very protections licensure was designed to ensure.

AKDHA remains firmly committed to protecting the public through the advancement of policies that uphold education, licensure, and professional accountability—because these standards do not change based on geography, and neither does our commitment to defend them.

Thank you for your time and consideration.

Sincerely,

Alaska Dental Hygienists’ Association
Shellea Trammell, RDH, BSDH - AKDHA President

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 3:00 PM
To: Rebekah Vanleer
Subject: Fw: Opposition to 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:24 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition to 6.a.v

From: Sindy Zapata <sjzm190@gmail.com>
Sent: Tuesday, March 24, 2026 7:17 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition to 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Opposition to this 6.a.v legislation.

This doesn't guarantee access to care, this will lower standards of care, instead of fighting the terrible dental insurance policies you're tackling the wrong problem.

This gives the understanding of prevention and education is not a priority to our current system. We are failing a large number of our population as well, by continuing down the current path that has been dictated to dental hygienists.

Dental hygiene is much more than what RDH are "allowed" to be/do.

We a system that care addressing opportunities for prevention focused healthcare professionals, and more opportunities to reach, help, and educate.

RDH should have the right to be more involved, more independent while still working closely with dental professionals, it's made to be a team, not a competition. As a dentist this is incredibly disappointing. All my support goes to my RDH and I wish more of my colleagues would understand that, RDH are essential and the first step on dental care, so we the dentists can focus on what is out main competence without

deteriorating the quality of care for our patients which it must be always be our top priority, and this legislation means completely the opposite.

This is not safe, this is not care, this impacts public trust.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:03 PM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:57 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Sonia Ortiz
Sent: Monday, March 23, 2026 8:04 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

Before becoming a Registered Dental Hygienist I was a Dental assistant for 13 years. I know first hand that an assistant does not have the education or qualifications to perform any hygiene duties.

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are

prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Sonia Ortiz
8090 Villa del Viento Dr
Las Vegas, NV 89131
23soniavll@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:33 PM
To: Rebekah Vanleer
Subject: Fw: Formal Opposition to Allowing Unlicensed Dental Assistants to Perform Scaling

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:33 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Formal Opposition to Allowing Unlicensed Dental Assistants to Perform Scaling

From: Stacia Dimmitt <staciadimmitt@gmail.com>
Sent: Saturday, March 21, 2026 3:04 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Formal Opposition to Allowing Unlicensed Dental Assistants to Perform Scaling

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Nevada State Board of Dental Examiners,
I am writing in **strong opposition** to the proposal to allow unlicensed and undertrained dental assistants to perform supragingival scaling. This change represents a significant departure from established standards of care and raises serious concerns regarding patient safety, quality of treatment, and the integrity of the dental profession.

Dental hygienists undergo rigorous, standardized education and licensure processes to ensure they are fully prepared to provide safe and effective patient care. This includes comprehensive training in anatomy, physiology, periodontology, infection control, radiography, pharmacology, and medical emergency management. Beyond technical skill, our education emphasizes critical thinking, risk assessment, and clinical judgment—skills that are essential when performing even seemingly routine procedures like supragingival scaling.

Supragingival scaling is not merely the removal of visible plaque and calculus. It is a clinical procedure that requires the provider to assess tissue health, recognize signs of periodontal disease, identify contraindications, and respond appropriately to patient-specific conditions such as systemic disease, medications, or oral pathology. Dental hygienists are trained to detect early signs of oral cancer, gingival inflammation, recession, and other abnormalities that may otherwise go unnoticed. These assessments are integrated into every patient interaction, ensuring a comprehensive standard of care.

Eliminating formal education and licensure requirements for individuals performing these procedures places patients at unnecessary risk. Without adequate training, there is a greater likelihood of incomplete calculus removal, damage to tooth surfaces or soft tissues, failure to recognize disease progression, and missed opportunities for early diagnosis of serious conditions. Patient care should never be compromised for the sake of convenience or cost reduction.

It is also important to consider the precedent this sets within the broader healthcare system.

Comparable professions, such as nursing, maintain strict educational and licensure standards to protect patient safety and uphold professional accountability. It would be unthinkable to allow unlicensed individuals to perform clinical procedures in those fields, and dentistry should be held to the same standard.

The value of formal education extends beyond technical competence. It instills ethical responsibility, adherence to evidence-based practices, and accountability to regulatory standards. Licensed dental hygienists are required to maintain continuing education, ensuring that their knowledge and skills remain current and aligned with best practices. Removing these safeguards undermines both public trust and professional credibility.

In conclusion, I strongly urge the Board to reject this proposal. Protecting the health and safety of Nevada's residents must remain the top priority. Maintaining established standards for education, licensure, and clinical competency is essential to ensuring high-quality dental care.

Thank you for your time and consideration.

Respectfully,

Stacia Dimmitt, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:13 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:39 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Oppose 6.a.v

-----Original Message-----

From: Stayce O'Leary <stayceolearyrdh@gmail.com>
Sent: Monday, March 23, 2026 1:09 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am writing to oppose item 6.a.v. As a hygienist, I see so many problems with this bill. The obvious is that assistants do not have close to the training and knowledge a licensed dental hygienist does. Those that are in favor of this bill are also uneducated about what we do. It is dangerous and a waste of everyone's time to only clean supragingivally. The reason people get their teeth cleaned is to remove bacteria and biofilm under the tissue to treat or prevent disease. Cleaning above the gumline is only cosmetic and similar to tooth brushing. This is dangerous for patients to go out in their everyday business thinking that they are doing the right thing and getting their teeth cleaned, when in reality, they just had their teeth brushed.

The problem with the hygiene shortage isn't with lack of hygienists, it's that hygienists don't care for working for corporations. I feel that this bill doesn't come down to a shortage of hygienists. It really comes down to the fact that dentists do not want to pay for a hygienist when they can pay an assistant half the salary. This isn't about what is right for the patients at all, it's about profits. Otherwise, this bill would not be passed so that someone could make money on a useless service.

Thank you,
Stayce O'Leary RDH
Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:55 AM
To: Rebekah Vanleer
Subject: Fw: Nevada Dental Hygienists' Association Opposes 6va!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:34 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Nevada Dental Hygienists' Association Opposes 6va!

-----Original Message-----

From: bounce@bounce.votervoice.net <bounce@bounce.votervoice.net> On Behalf Of Susan Dameron
Sent: Monday, March 23, 2026 7:46 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Nevada Dental Hygienists' Association Opposes 6va!

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada BOD Nevada BOD,

I am writing to respectfully submit my formal opposition to agenda item 6.a.v the proposal under consideration that would allow unlicensed and under-trained dental assistants to perform supragingival scaling.

Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is not a simple or purely mechanical task—it requires clinical knowledge, technical skill, and the ability to recognize signs of disease and complications. Without standardized and formal education and training, there is a significant risk that oral health conditions may be missed or improperly managed, potentially leading to harm.

The Commission on Dental Accreditation (CODA) establishes nationally recognized standards to ensure that dental professionals are properly educated and clinically competent. Allowing individuals who have not completed a CODA-accredited program to perform scaling procedures bypasses these established safeguards and creates inconsistency in the level of care provided to Nevada patients.

Licensed dental hygienists undergo rigorous education, clinical training, and examination to ensure they are prepared to deliver safe and effective care. Expanding this responsibility to unlicensed personnel undermines these standards and may increase the risk of injury, infection, and inadequate treatment.

In contrast, we support agenda item 6.a.iv, allowing dental hygienist work with the authorization of a dentist and not under their supervision. Allowing dental hygienists to practice with authorization increases access to dental hygiene services without the direct supervision of a dentist. Supervision rules often require a dentist to be physically present where care is being delivered, thus removing supervision barriers enables access to more preventive care.

For these reasons, I respectfully urge the Board to reject agenda item 6.a.v and support 6.a.iv and uphold the current standards that protect the health and safety of Nevada residents.

Sincerely,

Susan Dameron
821 Madrid Ave
Henderson, NV 89015
suedameron@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:59 AM
To: Rebekah Vanleer
Subject: Fw: NO!!!!

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:33 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: NO!!!!

From: Susan Dameron <suedameron@gmail.com>
Sent: Monday, March 23, 2026 7:22 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: NO!!!!

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License # 3317

I oppose the proposal to allow untrained and unlicensed dental employees to perform scaling with on the job training!!!

Susan L. Dameron, RDH
m 702.758.9585

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:18 PM
To: Rebekah Vanleer
Subject: Fw: I oppose agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:55 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: I oppose agenda item 6.a.v

From: Doug Bohall <doughb@charter.net>
Sent: Sunday, March 22, 2026 6:13 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: I oppose agenda item 6.a.v

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Subject: Public Comment – 3/25/2026- Opposition to Agenda Item 6.a.v

To: Nevada State Board of Dental Examiners

2651 N. Green Valley Pkwy, Ste. 104

Henderson, NV 89014

Date: 3/22/26

RE: Opposition to Agenda Item 6.a.v

Dear Members of the Board,

I am writing to formally submit my opposition to Agenda Item 6.a.v regarding dental assistants to be allowed to perform scaling procedures on live patients with 200 hours of instruction, as presented in the proposed regulations.

As an active Nevada Licensed Registered Dental Hygienist for 40 + years, I am concerned that the adoption of this regulation will:

- Jeopardize patient safety by lowering established standards.
- Reduce the quality of care provided by our profession.
- Erode the educational requirements necessary to safely perform these procedures.

Specifically, I oppose the proposed changes because allowing on-the-job training in lieu of accredited education will jeopardize patient safety.

I urge the Board to reject the proposed regulation 6.a.v to protect the high standards of oral health care in Nevada.

Thank you for your time and consideration of my comments.

Sincerely,

Sylvia Bohall RDH

1250 LaGuardia Ln.

Reno, NV 89511

doughb@charter.net

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:28 PM
To: Rebekah Vanleer
Subject: Fw: Oppose 6av

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:38 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: Oppose 6av

From: Tanya Glass <denah27@yahoo.com>
Sent: Sunday, March 22, 2026 8:04 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Oppose 6av

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Nevada State Board of Dental Examiners,
As a licensed Dental Hygienist of 23 years, I am writing to express my strong opposition to Agenda Item 6.a.v, which proposes allowing uneducated, unlicensed dental assistants to perform supragingival scaling.

Dental hygienists complete rigorous education and training—typically four years of college-level coursework, including biomedical sciences, pre-medical prerequisites, national board examinations, and clinical competency testing. This extensive preparation ensures that patients receive comprehensive, effective, and safe preventive care.

Allowing individuals without this education or licensure to perform scaling procedures undermines both patient safety and the integrity of the dental profession. Supragingival scaling performed in isolation is not effective preventive care. It does not address the subgingival biofilm and calculus that contribute to periodontal disease, nor does it provide the level of assessment and clinical judgment required to identify early signs of pathology.

This proposal diminishes the value of the dental hygiene profession and risks misleading patients into believing they are receiving adequate periodontal care when they are not. I urge the Board to uphold the standards that protect the public and to reject Agenda Item 6.a.v.

Please respect the education, licensure, hard work and clinical expertise of Nevada's dental hygienists, and preserve the integrity of the dental profession.

Thank you for your consideration.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:17 PM
To: Rebekah Vanleer
Subject: Fw: OPPOSING AGENDA ITEM 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:37 AM
To: Arielle Cymerman <acymerman@dental.nv.gov>; Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: OPPOSING AGENDA ITEM 6.a.v

From: Tanaye Benbo <tanayemeree@gmail.com>
Sent: Monday, March 23, 2026 12:17 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: OPPOSING AGENDA ITEM 6.a.v

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To whom it may concern,

As a licensed dental hygienist in the state and a constituent in your district, I am writing to express my strong opposition to agenda item 6.a.v which would allow an alternative path to dental hygiene licensure through on-the-job training. This provision bypasses the formal education and licensure standards currently required by our state and completed by every practicing Nevada dental hygienist.

I believe this bill poses a significant risk to public health and safety by offering a substandard approach to addressing workforce shortages. It also introduces potential inconsistencies in training and undermines public confidence and trust in healthcare providers.

Dental hygienists are clinically trained healthcare professionals who must complete nearly 3,000 hours of education and training. This includes graduating from a CODA-accredited (Commission on Dental Accreditation) program, passing a standardized national written exam, completing a clinical competency exam, and passing a jurisprudence exam. Agents Item 6.a.v would dismantle these critical safeguards and threaten the integrity and professional excellence of the dental hygiene profession.

I urge you to uphold the standards that protect patients and ensure that anyone seeking to practice dental hygiene in Nevada meets the educational and licensure requirements established by our state board. Please strike agenda item 6 a.v. Allowing on-the-job training to replace accredited education sets a dangerous precedent and compromises the quality of patient care.

Thank you for your attention to this matter and for your commitment to protecting the oral health of Nevadans!

Tanaye Benbo-Leahey-Bucsit, RDH

Sent from my iPhone

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 1:25 PM
To: Rebekah Vanleer
Subject: Fw: Public Comment Opposing Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:53 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Cc: Andrea Barraclough <abarraclough@dental.nv.gov>
Subject: FW: Public Comment Opposing Agenda Item 6.a.v

From: Taryn S <tlmadrid23@gmail.com>
Sent: Monday, March 23, 2026 6:43 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Public Comment Opposing Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Members of the Nevada State Board of Dental Examiners,

I am writing to respectfully oppose agenda item 6.a.v, which proposes allowing unlicensed and under-trained dental assistants to perform supragingival scaling and to modify RDH supervision requirements. Patient safety must remain the highest priority in any regulatory decision. Supragingival scaling is a clinical procedure that requires proper education, training, and licensure to ensure it is performed safely and effectively. Allowing individuals without CODA-approved education and licensure to perform these procedures increases the risk of misdiagnosis, improper technique, infection control issues, and potential harm to patients.

Additionally, removing or weakening supervision requirements undermines established standards of care and accountability within the dental profession. Licensed dental hygienists are specifically trained to recognize oral health conditions, provide preventive care, and identify issues that may require further treatment. These competencies cannot be replaced without compromising quality of care.

Lowering educational and licensure standards sets a concerning precedent and may ultimately erode public trust in Nevada's dental care system. Rather than reducing standards, efforts should focus on expanding access to care through safe, evidence-based solutions that maintain professional integrity. I urge the Board to reject agenda item 6.a.v and uphold the existing standards that protect Nevada patients.

Thank you for your time and consideration.

Sincerely,

Taryn Sorenson, RDH

--

Taryn Sorenson RDH, BS

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:52 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:29 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: TAWNY TYE <TAWNY.TYE@student.csn.edu>
Sent: Tuesday, March 24, 2026 10:59 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Tawny Tye and I am a student healthcare professional residing in Las Vegas. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our

existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Tawny Tye, (775) 393-0487, 8000745277@student.csn.edu



March 23, 2026

Nevada State Board of Dental Examiners

2651 Green Valley Parkway, #104

Henderson, NV 89014

Regarding March 25, 2026 Board Agenda Items 6a iv and 6a v

Dear Board Members,

ITEM 6a iv ~ In accordance with the Mission Statement of the Nevada Board of Dental Examiners and on behalf of the NDHA I am requesting that the Board move to authorize a workshop on item 6a iv “Dentist Supervision and Authorization of Dental Hygienists – NAC 631.210.”

Consideration of fully authorizing the existing licensed professionals to provide care at the highest capacity of the dental hygienist’s education is one mechanism to increase access to care and alleviate some of the workforce concerns.

PLEASE vote YES to authorize a workshop on NAC 631.210.

ITEM 6a v ~ On behalf of the NDHA I am requesting that the Board not consider NAC 631.220. A temporary, less trained and educated provider cannot meet the standards of safe oral health care that Nevadans deserve.

PLEASE vote NO to authorize any further discussion on NAC 631.220.

Thank you for your commitment to the safe delivery of oral care for all Nevadans.

Respectfully,

Caryn Solie, RDH, FADHA

NDHA Government Affairs Co-chair

PO Box 2602

Sparks, NV 89432

csolierdh@gamil.com

Tiffany Richardson, RDH
March 23, 2026

RE: Opposition to Assistant Scaling (Agenda Item 6.a.v.) and Support of Changing RDG Supervision Language (Agenda Item 6.a.iv)

Nevada Board of Dental Examiners
2651 N. Green Valley Pkwy, Ste 104
Henderson, NV 89014
nsbde@dental.nv.gov

Nevada State Board of Dental Examiners:

I am a licensed dental hygienist practicing in Nevada. I strongly *oppose* assistant scaling (Agenda Item 6.a.v.) and *support* changing RDH supervision language to *without the supervision of a dentist* (Agenda Item 6.a.iv). Assistant scaling is a serious and alarming undermining of public health safety regulations, which is quietly unfolding in our state. This provision allows unqualified individuals to operate outside of their skillset and circumvents the formal education required to perform these duties safely.

Dental hygienists are educated and licensed healthcare providers who work in close proximity to delicate soft tissues, vascular structures, nerve bundles, and exposed root surfaces. Our work is not simply mechanical; it requires a deep understanding of pharmacology, systemic diseases, procedural contraindications, and pathology. These are subjects which are part of our formal education and licensure. Without a strong formal foundation, unqualified individuals are placing public safety at risk.

This dangerous proposal threatens to compromise patient safety, devalue the professional of dental hygiene, and create a public health crisis around the proper treatment and prevention of periodontal disease. Dental hygiene is a healthcare profession, not an “on-the-job” learned skill. We would never consider bypassing proper education for RN, DMD, MD, or other healthcare professions. This proposal exploits vulnerable patients who rely on quality care, not corner-cutting. This is short-sighted, reckless solution which creates opportunity for malpractice and negligence lawsuits.

A better way forward would be to meet workforce demands without compromising patient care. We should encourage current dental hygiene program retention and support new hygiene programs. We can also improve license portability so that hygienists licensed in other states can more easily practice in Nevada. Allowing assistants to perform hygiene duties will only drive prospective hygienists from other states away from Nevada. We may also streamline the licensing process for internationally trained hygienists who graduated from accredited programs abroad and meet U.S. clinical standards. Handing out underserved scopes of practice and titles is reckless and sloppy.

Dental hygienists are experts in this field and deserve to be respected as such. We cannot blur professional lines when it places public health at risk. Thank you for your service and consideration.

Respectfully,

Tiffany Richardson, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:28 PM
To: Rebekah Vanleer
Subject: Fw: 6a.v. opposition

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 9:39 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>
Subject: FW: 6a.v. opposition

From: Jenn Burns <jburnsrdh@gmail.com>
Sent: Sunday, March 22, 2026 10:35 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: 6a.v. opposition

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To The Nevada Board of Dental Examiners,

I am writing to express my opposition to the proposal to allow unlicensed individuals to perform duties that I as a hygienist not only studied countless hundreds of hours to perform but also passed several exams to become licensed to complete treatment.

This proposal jeopardized the safety and health of the community. Dental hygienist are specialized licensed practioners that serve the community in ways that those without proper education cannot fathom.

This proposal is like allowing a CNA to perform the duties if an RN.

Doing so not only is reckless but is also highly unethical.

The passing of this proposal sets a dangerous precedent that we has a dental profession has been fighting towards. That is taking Dental health seriously and including dental health in the health of our community as a whole. Setting back all that we as a profession have gained in progress.

Please consider this letter of opposition to the proposal.

Sincerely NC RDH
Tran Jenn Huyen Burns, RDH
NC license #10433

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:47 PM
To: Rebekah Vanleer
Subject: Fw: Opposition 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:31 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition 6.a.v

From: Tricia Ramos <tricialynnrhd@gmail.com>
Sent: Tuesday, March 24, 2026 11:57 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition 6.a.v

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To whom it may concern:

I am a registered dental hygienist (RDH) in Nevada. I oppose agenda item 6.a.v and support agenda item 6.a.iv.

RDHs must learn the same material during schooling as registered nurses do in addition to proficiency in dental clinical skills. The combined knowledge and skills can't be taught casually in 200 hours of training. Allowing dental assistants to scale supragingivally is harmful to patient health because complete subgingival calculus removal is required to promote a health periodontium.

I have been practicing dental hygiene for over 3 years now. I will often see new patients that have only had their teeth cleaned every 6 months/annually by the dentist at their previous office. Many of these patients have periodontal disease that they weren't aware of because only supragingival scaling was done, leaving subgingival calculus to sit beneath the gums and destroy the bone that is holding teeth in place. Often, an RDH's dental hygiene diagnosis greatly supports the dentist in diagnosing periodontal disease. An assistant with no formal education will not have the additional knowledge to contribute to the discussion in determining the best course of action when it comes to treating a patient with periodontal disease.

This concept has been proposed to prior legislative sessions three times and has faced backlash each time by dental professionals, medical professionals, and the general public. Nevada does not want sub-standard care. There are better ways to address the “shortage” of dental hygienists in Nevada including supporting the dental and dental hygiene compact, increasing funding to our existing dental hygiene programs, and eliminating supervision for dental hygienists to support underserved rural populations.

Thank you for your consideration,
Tricia Lynn Ramos, RDH

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:10 PM
To: Rebekah Vanleer
Subject: Fw: Opposing 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104

Henderson, Nevada 89014

T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:19 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposing 6.a.v

-----Original Message-----

From: Trisha Fuller <trisha.fuller3@gmail.com>
Sent: Sunday, March 22, 2026 9:53 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposing 6.a.v

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Approving 6.a.v will in time have a devastating impact on the oral health of the public. Hygienists go thru thousands of hours of training not only to recognize and treat periodontal disease, but to also screen for oral cancers and other systemic diseases. Allowing uneducated assistants to scale when they do not even know correct instrumentation will open the door for malpractice suits and along with many patients going with undiagnosed periodontal disease. Please oppose the 6.a.v proposal.

Trisha Fuller R.D.H.

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:51 PM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:30 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

-----Original Message-----

From: Valen Chanla <valen.chanla@gmail.com>
Sent: Tuesday, March 24, 2026 11:16 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

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Dear Nevada State Board of Dental Examiners,

My name is Valen Chanla and I am a concerned patient residing in Las Vegas. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Valen Chanla
Valen.chanla@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 12:01 PM
To: Rebekah Vanleer
Subject: Fw: opposing agenda item 6.a.v

A.L. Higginbotham

Executive Director - Nevada State Board of Dental Examiners

2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:32 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: opposing agenda item 6.a.v

From: Valerie <valgal1969@charter.net>
Sent: Monday, March 23, 2026 6:46 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: opposing agenda item 6.a.v

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- Allowing dental assistants to scale supragingivally will harm patient health (complete subgingival calculus removal is required to promote a healthy periodontium).
- This same concept has been proposed to prior legislative sessions; and was denied THREE TIMES.
- This approach compromises patient health in favor of sub-standard care.
- The NSBDE claims there is a shortage of dental hygienists in the state of Nevada; will dental hygienists want to come to Nevada and compete with dental assistants?
- Dental hygienists have never before been required to supervise the work of a colleague; time and efficiency will be an issue, which would lead to burnout and a higher rate of attrition of our dental hygienists and further worsen the perceived workforce shortage.

A few suggestions to address the NSBDE's concern for a shortage of dental hygienists:

- Approve the dental and dental hygiene compact (this would allow hygienists to move to Nevada with fewer obstacles when transferring their license across state lines).
- Campaign to increase funding to our existing dental hygiene programs to increase the number of graduating students each year.
- Train dental offices to utilize the assisted dental hygiene model.
- Eliminate supervision for dental hygienists, which would allow us to provide healthcare services to underserved rural populations who do not have access to a dental office.

Veronica Tognoni, RDH
Nevada Licensed Dental Hygienist

Date: March 24, 2026

Nevada State Board of Dental Examiners
6010 S. Rainbow Blvd., Suite A-1
Las Vegas, NV 89118

RE: Strong Opposition to Agenda Item 6.a.v

To the Nevada State Board of Dental Examiners,

I am writing in strong opposition to Agenda Item 6.a.v.

I have spent over 20 years in dentistry, as a dental assistant, a licensed dental hygienist, and a dental hygiene instructor at Truckee Meadows Community College for 10 years. I have dedicated my career to patient care, education, and upholding the standards of our profession.

What is being proposed is not a minor adjustment, it is a fundamental lowering of the standard of care.

Scaling teeth is not a simple task. It is not just "cleaning." It requires deep knowledge of anatomy, instrumentation, disease processes, and clinical judgment developed through years of education and hands on training. When done incorrectly, it can cause permanent damage, gum recession, tissue trauma, enamel removal, and long term periodontal harm.

I have worked in many dental offices, and I say this with honesty and concern, the majority of dental assistants are not trained to perform prophylaxis at a clinically acceptable level. That is not a criticism of them, it is a reflection of their role. They are trained to assist the dentist, not to perform preventive periodontal procedures independently.

Allowing unlicensed or under trained individuals to perform scaling, even supragingival, puts patients directly at risk.

It also sends a troubling message, that the extensive education, licensing, and clinical training required of dental hygienists can be bypassed. This devalues our profession and undermines the trust patients place in us to provide safe, competent care.

I am also deeply concerned about how this will be used in real practice settings. If this passes, it will not remain limited or controlled, it will be expanded, pressured, and ultimately abused. Production demands will take priority, and patients will receive substandard care without fully understanding the difference.

This is not a workforce solution. It is a patient safety issue.

As professionals, we have a duty to protect the public, not lower the bar of care.

I respectfully and strongly urge you to reject this proposal.

Veronica Tognoni

Veronica Tognoni, RDH
Nevada Licensed Dental Hygienist

To Whom It May Concern,

March 24, 2026

I am writing to express my strong opposition to Agenda Item 6.A.V.

After reviewing the proposal, I am deeply concerned that it poses a direct risk to public safety. As written, this item could result in conditions that increase the likelihood of harm to the public, whether through inadequate safeguards, increased hazards, or insufficient oversight. Moving forward without fully addressing these risks would be irresponsible and could have serious consequences for the community.

Public safety must be the highest priority in any decision of this kind. This proposal, in its current form, fails to demonstrate that adequate protections are in place to prevent harm. Eliminating formal education and licensure standards puts patients at risk.

For these reasons, I strongly urge you to reject this item.

Thank you for your time and consideration.

Sincerely,

Vicky Mouansengphet

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:13 PM
To: Rebekah Vanleer
Subject: Fw: Regarding meeting on March 25 6pm

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 11:40 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Regarding meeting on March 25 6pm

From: Vickie Bell <vickie.a.bell@aol.com>
Sent: Monday, March 23, 2026 1:36 PM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Regarding meeting on March 25 6pm

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Regarding meeting on March 25, 2026 6pm

My fellow friends/hygienists and myself oppose agenda item 6.a.v.

This is an unethical decision. Assistants need a formal education and license standards. Assistants do not have the formal education, and training that dental hygienists do. (They have not learned in depth things such as: tooth anatomy, patient's medical issues, oral medical manifestations, gingivitis, periodontal disease and more). Allowing assistants to remove tartar/plaque/stain/use hand scaling instruments and ultrasonic instruments is dangerous and can harm the patients.

Thank you for your time.
Please do not pass this bill.

Sincerely,
Victoria Bell

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 2:50 PM
To: Rebekah Vanleer
Subject: Fw: Opposition of Agenda Item 6a.v.

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Tuesday, March 24, 2026 2:30 PM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: Opposition of Agenda Item 6a.v.

From: Yaquelin Serrano <serr.yaq@gmail.com>
Sent: Tuesday, March 24, 2026 11:17 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: Opposition of Agenda Item 6a.v.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Yaquelin Serrano and I am a concerned patient residing in Las Vegas . I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,
Yaquelin Serrano
serr.yaq@gmail.com

Rebekah Vanleer

From: Adam Higginbotham
Sent: Tuesday, March 24, 2026 11:44 AM
To: Rebekah Vanleer
Subject: Fw: URGENT: OPPOSITION to Agenda Item 6.a.v

A.L. Higginbotham
Executive Director - Nevada State Board of Dental Examiners
2651 N. Green Valley Parkway, Suite 104
Henderson, Nevada 89014
T: 702.486.7048 | E: ahigginbotham@dental.nv.gov

From: Board of Dental Examiners <nsbde@dental.nv.gov>
Sent: Monday, March 23, 2026 10:42 AM
To: Adam Higginbotham <ahigginbotham@dental.nv.gov>; Arielle Cymerman <acymerman@dental.nv.gov>
Subject: FW: URGENT: OPPOSITION to Agenda Item 6.a.v

From: Yisbell Hernandez <yhcasique@hotmail.com>
Sent: Monday, March 23, 2026 9:59 AM
To: Board of Dental Examiners <nsbde@dental.nv.gov>
Subject: URGENT: OPPOSITION to Agenda Item 6.a.v

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Dental Examiners,

My name is Yisbell Hernandez and I am a dental hygiene student residing in Las Vegas. I am writing to you today to strongly OPPOSE Agenda Item 6.a.v.

Allowing unlicensed and under-trained dental assistants to perform supragingival scaling after only 200 hours of training is a direct threat to patient safety and public health. By comparison, dental hygiene students complete thousands of hours of rigorous clinical experience to ensure they meet the standard of care.

Lowering these CODA-approved educational standards puts Nevadans at risk. Proper calculus removal is not just a basic task; it is a critical medical procedure required to promote a healthy periodontium. Compromising patient health in favor of sub-standard care is unacceptable, which is why this same concept has been denied during three prior legislative sessions.

Instead of lowering the standard of care to address workforce shortages, I urge the Board to focus on safer alternatives, such as approving the dental and dental hygiene compact, increasing funding for our existing dental hygiene programs to graduate more students, or utilizing the assisted dental hygiene model.

Nevadans deserve safe, high-quality dental care from fully trained and licensed professionals. Please protect patient safety and vote NO on Agenda Item 6.a.v.

Thank you for your time and for protecting the health of our community.

Sincerely,

Yisbell Hernandez, 7022097011, yhcasique@hotmail.com

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