

September 14, 2020

Ms. Sandra Reen Executive Director Virginia Board of Dentistry 9960 Mayland Dr., Suite 300 Henrico, VA 23233

Dear Ms. Reen and Members of the Board,

The Virginia Dental Association is greatly concerned about the motion that the Board of Dentistry approved at the March 13, 2020 business meeting to have the Regulatory-Legislative committee "develop separate regulations for pediatric sedation to include setting an age limit which requires sedation and treatment to be performed in a hospital setting."

Our foremost concern is that many pediatric dental patients have special health care needs and/or are from lower income families who are on Medicaid or have no medical coverage and are, therefore, denied treatment at hospitals. These children would be adversely impacted if this restriction were to be imposed. If the Board were to enforce an age restriction for the delivery of anesthesia in a dental office, it would inhibit access to care for a particularly vulnerable population of children.

The VDA, along with the American Dental Association (ADA) is committed to the safe and effective use of sedation and general anesthesia by appropriately educated and trained dentists. The ADA's *Guidelines for the Use of Sedation and General Anesthesia by Dentists* provides thorough guidance and, for children, they support the *American Academy of Pediatrics/American Academy of Pediatric Dentistry Guidelines for Monitoring and Management of Pediatric Patients During and After Sedation for Diagnostic and Therapeutic Procedures.* Due to the commitment by dentists to provide quality care through safe practices, the use of sedation and anesthesia in the dental office continues to have a remarkable record of safety.

We appreciate the opportunity to comment on this matter. Thank you in advance for your consideration and please do not hesitate to reach out to us with any questions or for further insight on this important issue.

Sincerely,

Ryan Dunn

Executive Director

Virginia Dental Association