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TO: All Members, Assembly Committee on Health
FROM: Matt Rossetto, WDA Director of Government Services

RE: Clearinghouse Rule 18-050, Advance Practice Nurse Prescribers Collaboration with Dentists

Dear Committee Members,

Thank you for the opportunity to comment the Board of Nursing's recent rule change, which would allow for Advance Practice Nurse Prescribers to enter into a collaborative relationship with a dentist. The Wisconsin Dental Association supports this change.

First, it is important to understand how dentists are licensed in Wisconsin. We do not license dentists by specialty; for example, a general dentist and an oral surgeon receive the same license. In contrast, some other states have different licenses for specialties such as oral surgeons or orthodontists. This means that WDA represents not just general dentists, but all types of oral health specialists.

Most general dental offices will not have use for a CRNA. However, certain specialists, particularly oral surgeons, can and already do make use of them in their offices. CRNA's exist specifically to administer anesthesia, a highly complex and incredibly important function that requires significant education. One of the primary reasons that dentists are comfortable using CRNA's in their offices is because they are highly skilled professionals. Their education requires, in order:

- A relevant bachelor's degree, such as a BSN;
- Being licensed as a Registered Nurse;
- A minimum of one year practicing in an acute care setting prior to entering a CRNA program;
- Earning a masters or a doctorate.

Perhaps most importantly, this rule change will fix a gray area of the administrative code. Currently, the Board of Nursing rules only state that a CRNA may enter into a collaborative relationship with a physician. It is silent on collaboration with dentists. However, in practice, Wisconsin dentists are already using these providers in their practices. This change simply codifies what is already taking place.

The American Association of Oral and Maxillofacial Surgeons (AAOMS) does not officially track the number of their members using CRNA's; however, their informal surveys do indicate that their usage is growing. Due to the timing of this hearing and July's vacation schedules, I am unable to provide an official statement from AAOMS on their letterhead. However, I am authorized to verbally state that AAOMS and its Wisconsin chapter, the Wisconsin Society of Oral and Maxillofacial Surgeons (WSOMS) are also in support of this rule change.

Members with questions about WDA's position are welcome to contact me at mrossetto@wda.org, or at 608-250-3442.