CONCISE EXPLANATORY STATEMENT

Summary of Public Comments on WAC 246-812-501 Purpose

And

WAC 246-812-452 Prefabricated Implant Abutments

December 2023

The board adopted a new rule for the use of prefabricated implant abutments. The board received a question asking if a denturist could place a prefabricated implant abutment. Three members of the board serve on the Dental Collaboration Committee with Dental Quality Assurance and Dental Hygiene Examining Committee members. The Dental Collaboration Committee met with interested individuals to discuss the placement of prefabricated implant abutments by denturists. The committee asked the board to further evaluate chapter 18.30 RCW and 246-812 WAC related to the scope of practice. The board determined that a CR-101 be filed to start the official rule making process to consider clarifying when a denturist can place the abutment.

The rule amendment adopted by the board is to ensure that a licensed denturist develops and maintains written infection control policies and procedures appropriate for the denturist services provided by the facility.

WAC 246-812-462 Prefabricated implant abutments was amended during the rule hearing after the board had read the comments and heard testimony from the Washington State Dental Association (WSDA). WSDA had requested the board to consider adding language that the abutment seat shall be verified by radiographic assessment by a licensed dentist “no more than 60 days” prior to delivery of the denture. After discussion, the board agreed to amend the language to say “no more than 90 days” prior to delivery of the denture. WSDA agreed that the proposal of the board would be sufficient.

Following the hearing, staff received an email stating that the rule only mentioned abutment and not prefabricated implant abutment. This was an oversight on the part of staff and is a technical amendment that has been approved by the board chair.

Rulemaking is necessary to achieve the statute’s goals and objectives by providing updated requirements that are clear, concise, and necessary to ensure patient safety. Rulemaking establishes enforceable credentialing requirements and safety mechanisms for patients receiving denturist services.

The board adopted the rules at a public rules hearing held on October 25, 2023, by webinar with a physical location in Tumwater, Washington. The board thanks everyone who participated in this rulemaking process.

The board did receive comments to WAC 246-812-462 Prefabricated implant abutments and did make changes to the proposed rule language. The board adopted the language as published with the Office of the Code Reviser under WSR -- on December , 2023.

* Clinical standard would require radiographic (X-ray) confirmation of complete seating for prefabricated abutments. Is this feasible in a denturist office setting?

The rule requires that the abutment seat be verified by radiographic assessment by a licensed dentist no more than 90 days prior to the delivery of the denture. It would not be done in a denturist office/clinic.

* I firmly believe that the procedure of seating an abutment on an implant sounds far simpler than the reality. Thus, this rule in question should be rejected. For the benefit of the patient, only a dentist should be fabricating and seating implant abutments and crowns. It is the practice of dentistry and outside the scope of practice of denturism. The original initiative I-607 was passed by the voters to allow denturists to fabricate full dentures. This proposed rule is another ill advised “scope of practice creep” that should not be allowed to maintain the high quality of dental care in Washington state.

The rule requires that the abutment seat be verified by radiographic assessment by a licensed dentist no more than 90 days prior to the delivery of the denture. It would not be done in a denturist office/clinic.

* WSDA states it is in the best interest of patient safety to include a set parameter around when a radiograph is taken and the delivery of the denture. As such and following discussion between members of the WSDA Committee on Regulatory Affairs, WSDA respectfully requests the board consider modifying the proposed rule language to specify a timeframe of 60 days between when a radiograph is taken and when a denture is delivered. This parameter would avoid jeopardizing the stability of the implant and ensure protection for Washington patients. The WSDA also provided testimony at the rule hearing regarding having a time frame in between the radiographic assessment when the denture is placed.

After reviewing the written comments and listening to the testimony, the board discussed adding in a timeframe between when a radiograph is taken, and the denture is delivered. A motion was made that instead of 60 days, 90 days would be acceptable. The board unanimously agreed that the rule be clarified to add that the abutment seat shall be verified by radiographic assessment by a licensed dentist no more than 90 days prior to delivery of the denture.

* The Washington Denturist Association (WDA) wants it put on the record that they support the prefabricated implant abutment rule

Please direct any questions regarding this rule adoption to Vicki Brown at 360-236-4865 or [vicki.brown@doh.wa.gov](mailto:vicki.brown@doh.wa.gov).