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April 18, 2025

RE: AB 873 Dentistry: dental assistants: infection control (Support if Amended)

Dear California Department of Public Health:

The California Conference of Local Health Officers (CCLHO), which represents the appointed physician health officers of California's 61 city and county jurisdictions, would like to express our recommendation to **support AB 873 if amended**. On April 4, 2025, the CCLHO Board of Directors voted to approve the support if amended recommendation. Subsequent amendments to the bill on April 8 eliminated some of CCLHO's concerns, but others remain.

Under existing law, the Dental Board of California oversees the licensure and regulation of dental auxiliaries, including dental assistants, and sets forth duties and functions that those dental auxiliaries are authorized to perform. Existing law establishes various requirements for courses in infection control for certain unlicensed dental assistants and requires an unregistered dental assistant not enrolled in a board-approved program for registered dental assisting or an alternative dental assisting program to complete an 8-hour course in infection control prior to performing any basic supportive dental procedures involving potential exposure to blood, saliva, or other potentially infectious materials. AB 873 would repeal those requirements and would instead provide that the employer of a dental assistant is responsible for ensuring that a dental assistant has completed the required 8-hour training in infection control within 90 days from the date of first employment at the dental office.

The legislation seeks to address a workforce shortage for dental assistants. There have been issues preventing the establishment of the eight-hour course virtually and the eight-hour course is not readily available in many parts of the state, especially remote and rural areas already experiencing access and workforce shortage issues.

CCLHO supports the legislation if the following amendments are incorporated into the bill:

1. While existing law allows for virtual training, virtual trainings are not yet available. Direct the dental board to approve virtual course formats by a specific date in order to make the training more accessible and flexible for new hires statewide in a timely manner.
2. Indicate that the requirements established by this bill do not supersede Cal/OSHA requirements for employers to ensure that all employees with occupational exposure to bloodborne pathogens participate in a training program provided at no cost to the employee and during working hours

at the time of initial exposure to tasks where occupational exposure may take place and annually thereafter (California Code of Regulations Title 8, Section 5193(g)(2)).

CCLHO was established in statute in 1947 to advise CDPH, other departments, boards, commissions, and officials of federal, state and local agencies, the Legislature, and other organizations on all matters affecting health.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aimee Sisson'.

Aimee Sisson, MD, MPH
President