



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

NOTICE OF ADOPTION OF AN INTERPRETIVE STATEMENT

Title of Interpretive Statement: Application Requirements for Moderate Sedation with Parenteral Agents Permits| Interpretive Statement Dental-03

Issuing Entity: Dental Quality Assurance Commission

Subject Matter: This statement clarifies the requirements stated in WAC 246-817-760 for obtaining a moderate sedation with parenteral agents permit (permit). Clarification is needed to assist dentists and training programs in meeting the requirements for obtaining a permit.

Effective Date: March 10, 2023

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*Department of Health
Health Systems Quality Assurance
Office of Health Professions*

Interpretive Statement

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| <i>Title:</i> | Application Requirements for Moderate Sedation with Parenteral Agents Permits | <i>Number: Dental-03</i> |
| <i>References:</i> | RCW 18.32.640 and WAC 246-817-760 | |
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| <i>Approved By:</i> | Lyle McClellan, DDS Chair, Dental Quality Assurance Commission | |

The purpose of this interpretive statement is for the Dental Quality Assurance Commission (commission) to clarify the experience requirements stated in WAC 246-817-760 for obtaining a moderate sedation with parenteral agents permit (permit). Clarification is needed to assist dentists and training programs in meeting the requirements for obtaining a permit.

Background and Analysis

The commission has identified that some people who apply for permits for moderate sedation with parenteral agents do not list adequate experience. In these applications, the patient records submitted demonstrated a lack of understanding of the requirement for each applicant to have provided moderate sedation to 15 or more patients. The commission has rejected some permit applications because applicants failed to meet the experience requirements.

Applicants for the permit are required to submit patient records for the commission's review to determine whether the applicant has the supervised experience required in WAC 246-817-760(1).

The purpose of parenteral sedation training is to ensure patients receive safe and effective sedation from the provider. A safe practitioner has critical thinking and clinical judgment skills obtained from 60 hours of didactic training and 15 or more experiences in providing moderate sedation, mentored by anesthesiologists or other experienced anesthesia providers. These skills include, but are not limited to, medical history collection, risk analysis, medical consults, venipuncture, administration of drugs, management of emergencies, and judgments regarding sedation. The sedation records used to obtain a permit must show this evidence.

The reviewers look for evidence consistent with moderate sedation. The permit will be denied if the records do not fit the pattern consistent with preparation for and administration of moderate sedation. Part of that expectation is titration of drugs until the desired level of sedation is reached. An attestation by the mentor of the achievement of moderate sedation is expected.

WAC 246-817-760(1) requires applicants for a moderate sedation with parenteral agents permit to complete supervised experience including moderate sedation of at least fifteen patients. The regulation provides:

(1) Training requirements: To administer moderate sedation with parenteral agents, the dentist must have successfully completed a postdoctoral course(s) of sixty clock hours or more which includes training in basic moderate sedation, physical evaluation, venipuncture, technical administration, recognition and management of complications and emergencies, monitoring, and supervised experience in providing moderate sedation to fifteen or more patients. If treating an adult, the dentist must have training in adult sedation. If treating a minor, the dentist must have training in pediatric sedation.¹

WAC 246-817-710(11) and (12) defines minimal and moderate sedation, and reads:

The definitions in this section apply throughout WAC [246-817-701](#) through [246-817-790](#) unless the context clearly requires otherwise.

(11) "**Minimal sedation**" is a drug induced state during which patients respond normally to verbal commands. Although cognitive function and coordination may be impaired, ventilatory and cardiovascular functions are unaffected.

(12) "**Moderate sedation**" is a drug induced depression of consciousness during which patients respond purposefully to verbal commands, either alone or accompanied by light tactile stimulation. No interventions are required to maintain a patent airway, and spontaneous ventilation is adequate. Cardiovascular function is usually maintained. Moderate sedation can include both moderate sedation/analgesia (conscious sedation) and moderate sedation with parenteral agent.

The purpose of the requirement in WAC 246-817-760(1) is to ensure that applicants have a minimum level of experience in assessing patients for sedation, inducing sedation, in procedure patient monitoring, recovering patients from a moderately sedated state and post procedure monitoring of patients. Inducing a lower level of sedation using parenteral methods does not provide this experience.

The commission does not endorse using any deeper level of sedation than needed to safely complete the dental procedure. With recognition of the impact on both training programs and applicants, the commission finds that this level of experience is necessary to protect the health and safety of patients undergoing moderate sedation.

Conclusion

To meet the experience requirements for a moderate sedation with parenteral agents permit, as set forth in WAC 246-817-760(1), each applicant must have supervised experience in providing sedation to 15 or more patients who during the course of the procedure have been maintained at level of sedation that meets the definition of moderate sedation in WAC 246-817-710(12).

¹ The commission is currently proposing rule revisions to section 246-817-701 through 790 that includes defining "pediatric" to mean a child twelve years of age or younger. The proposed revisions also replace the word "minor" with "pediatric" in this section.