



Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

Maryland State Board of Dental Examiners
Spring Grove Hospital Center - Benjamin Rush Bldg.
55 Wade Ave/Tulip Drive
Catonsville, MD 21228

March 6, 2024

The Honorable C.T. Wilson
Chair, House Economic Matters Committee
Room 231 House Office Building
Annapolis, MD 21401-1991

Re: HB 1201 – Occupational and Professional Licensing – Military Training and Military Spouses- Letter of Concern

Dear Chair Wilson and Committee Members:

The Maryland State Board of Dental Examiners is submitting this letter of concern for HB 1201 - Occupational and Professional Licensing – Military Training and Military Spouses. The bill requires health occupations boards, including the Dental Board, to issue a license, certificate, permit, or registration to an applicant if the applicant “Has completed a military program of training, been awarded a military occupational specialty, and performed that specialty at a level that is substantially equivalent to or exceeds the requirements of the occupational licensing board to which the applicant has applied.” In addition, the applicant must have “[E]ngaged in the active practice of the occupation or profession for which the individual is seeking a license, certificate, permit, or registration for at least 2 of the 5 years immediately preceding the date of the application.”

In addition, a health occupations board, including the Dental Board must issue a license, certificate, or permit to a military spouse if the applicant “Holds a current license, certificate, permit, or registration from another jurisdiction and that jurisdiction’s requirements for the license, certificate, permit or registration are substantially equivalent to or exceed the requirements of the occupational licensing board to which the applicant has applied.” In addition, the applicant must “Demonstrate competency in the occupation or profession in a method determined by the occupational licensing board.”

The military does not issue “dentist” specialties. One must be a dentist before entering the military. However, the Board is concerned that the educational requirements for a dental

hygienist specialty or designation in the military differs from branch to branch. In the military one can become a dental hygienist in approximately one year whereas standard programs in a school of dental hygiene are 2-year full-time programs. Even if the duration of the military program was 2 years it may be difficult to evaluate military programs without personal observation. Under the current law the Dental Board may only issue dental hygiene licenses to those who have graduated from a 2-year school of dental hygiene that has been approved by the American Dental Association's Commission on Dental Accreditation. The accreditation includes site visits for both didactic and clinical training. It also includes periodic site visits to maintain accreditation. The accreditation ensures that all approved schools throughout the country maintain consistently high standards.

With respect to those in the military or their spouses who already hold a license, certificate, registration or permit in another jurisdiction, it may be difficult to determine if their training was "substantially equivalent" to that required in Maryland. With respect to the issue of competency, the existing law requires that dentists and dental hygienists who graduate from dental or dental hygiene school take an examination administered by the American Board of Dental Examiners ("ADEX") as a condition of licensure. That examination is the most objective standard to determine basic competency. If an applicant passes the ADEX examination, they would qualify for a license. That said, under federal law, the Board currently issues licenses to those who are in the military and their spouses. The Veterans Auto and Education Improvement Act of 2022, 50 U.S.C.A. §4025a, provides that the Board must issue a license to a service member or their spouse if the service member has a license issued in another jurisdiction, (other than Maryland) relocates residency to Maryland, has military orders outside of their home state, and has practiced under their license for at least 2 years. The Board has already issued licenses under that law.

For these reasons the Board requests that HB 1201 receive an unfavorable report.

I hope that this information is helpful. If you would like to discuss this further, please contact me at 410-294-9900, rwindsor@umaryland.edu, or Dr. Edwin Morris, the Board's Legislative Committee Chair at 410-218-4203.

Sincerely,

Robert R. Windsor, D.D.S.

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Board President

The opinion of the Maryland State Board of Dental Examiners expressed in this letter of concern does not necessarily reflect that of the Department of Health or the administration.