



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 26, 2024

The Honorable Joseline A. Peña-Melnyk
Chair, Health and Government Operations Committee
Room 241, House Office Building
Annapolis, Maryland 21401-1991

Re: SB 799 – Health Occupations – Limited License to Practice Dentistry – Services for Adults
-Letter of Concern

Dear Chair Peña-Melnyk and Members of the Health and Government Operations Committee:

The Maryland State Board of Dental Examiners submits this letter of concern for SB 799 Health Occupations – Limited License to Practice Dentistry – Services for Adults as amended in the Senate. Under existing law prior to the introduction of the bill, the University of Maryland was specifically authorized to create a 2-year pediatric dental fellowship program during which foreign trained dentists would obtain a limited license to practice dentistry. Those in the program are contractually obligated to provide dental services for at least 2 years in a public health dental clinic or in a federally qualified or Maryland health center to Medicaid, uninsured, or indigent patients. Once the contractual obligation is completed, dentists in the program are permitted to apply for a general license to practice dentistry. During the period in which the current law has been in effect, the University of Maryland typically had from one to six pediatric program participants during the 2-year period. In other states and Canada, the programs may have more participants. Once the program is completed the participants apply for a general license. Although providing dental care to the State’s most vulnerable citizens is certainly commendable, obtaining a general license to practice dentistry after 2 years may be the strongest motivation for participation in the program.

Under the bill as initially proposed, the obligation to provide only pediatric dental care was deleted thereby allowing foreign trained dentists at the University of Maryland to provide dental care to adults. Again, under the bill as introduced the program was limited to the University of Maryland School of Dentistry. However, under the amendments adopted by the

House, the fellowship program has been extended to any dental school recognized by the Board. These include virtually all dental schools in the United States and Canada.

An issue faced by all states including Maryland is the comprehensiveness of the educational background of those who are foreign trained. Although the University of Maryland's program is well supervised and well known by Board members, the Board has no knowledge of the education or experience of the candidates in other states or the level of their supervision during the 2-year program in which they are providing dental care to the public.

Dental education varies widely in differing nations, and some programs are known to not meet minimum U.S. standards. The Board is greatly concerned that even with a 2-year residency, and the requirement that the ADLEX examination be passed, those practicing in other states under standards that do not meet traditional educational criteria and supervision may lack standardized skills and could lead to Maryland licensees who do not possess minimal competency.

Parenthetically the Board notes that neither the title of the bill nor the Purpose Clause mention that the fellowship programs throughout the United States and Canada will lead to a general license in Maryland. That must be discerned by reading page 3, lines 13 through 26 which is language in the existing law.

Because of the great divergence of training in other nations and the variance of programs throughout the U.S. and Canada, the Board fears that competency may be an issue for those who gain licenses in Maryland under what would be essentially a newly created nationwide program for Maryland licensure.

For these reasons the Dental Board requests that SB 799 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.

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.

Sincerely,
Robert R. Windsor, D.D.S.
Robert R. Windsor, D.D.S.
Board President