February 7, 2025

To: Senator Beidle, Chair and Senator Hayes Vice Chair Finance Committee members

Re: I oppose – SB0021 It presents a public safety risk with diluted language regarding non (CODA) Council on Dental Accreditation educational programs and the lack of a clearly defined hands skills examination needed to validate clinical competency.

Dear Hon. Senator Beidle, Senator Hayes, and distinguished members of the Finance Comm.,

Good afternoon, I am Betty Howard a licensed dental hygienist practicing in Montgomery County for 42 years. I served on Maryland's Board of Dental examiners and was honored to be the first Dental Hygienist to be President of Dental Board. My experience as a dental hygiene examiner for 30 years, has given me great insight. I have often witnessed why the ADEX exam should be used to validate clinical competency.

As a concerned dental hygienist, SB0021, also known as the CSG/ADA Dentist and Dental Hygienist (DDH) Compact, is a threat to public safety. It lowers licensure standards by allowing dental professionals to practice across state lines without completing hand-skills examinations to validate competency. Educational standards maybe diluted by broadening the authority to allow the Department of Education to accredit educational programs. This will open Pandora's Box! There could be mentored preceptorship programs or other non-CODA accredited programs with unknown curriculums.

SB0021 raises major concerns and lessens the current standards that have existed in dentistry in Maryland for decades.

The DDH compact does not give a state dental board authority over persons practicing under a compact privilege. In Maryland rules and regulations grant various permits linked to a practitioner's license. States have different criteria for permits. There are various Continuing Education courses, renewal intervals and processes involved in monitoring special permits. How will someone functioning under a privilege manage differences with a permit to administer General Anesthesia for example? Legislative language of the DDH Compact in Section 13: Consistent Effect and Conflict with Other State Laws reads, "Any laws, statutes, regulations or other legal requirements in a member state that conflict with the compact is superseded to the extent of the conflict." This is very concerning. It is unclear if the member state would even know what credentials the 'privileged' practitioner will have.

I ask that you please take a stand to preserve Maryland's current standards for the profession of dentistry and oppose SB0021.

Very truly yours, Betty Howard, BSDH, RDH, Potomac, MD 20854 District 15