

Written Testimony for 2/11/25

To: The Senate Finance Committee  
Senator Pamela Beidle, Chair  
3 East Miller State Office Building  
Annapolis, Md. 21401

RE: SB 21 Dentist and Dental Hygiene Compact

Dear Madame Chair and Finance Committee:

I am Dr. Shari Kohn, a board-certified Pediatric Dentist in Maryland. I am representing the Maryland State Board of Dental Examiners in OPPOSITION of SB 21 – the Dentist and Dental Hygiene Compact referred to subsequently as DDH.

This compact does NOT follow compacts that currently exist in medicine.

This compact has the most danger and risk of the two compacts being presented today and could potentially put the citizens of Maryland in danger. It grants the Dentist and Dental Hygienist a Privilege and NOT a license in our state.

It never mentions the word LICENSE and only uses the word PRIVILEGE.

It DOES NOT require graduation from a CODA (Commission on Dental Accreditation) approved Program. CODA is the gold standard in dental education. This compact also DOES NOT require a “hands on” clinical examination for licensees.

Since this compact allows the applicant to obtain a PRIVILEGE from the state of Maryland – NOT a license, and as such it does NOT allow the state dental board to require that the holders of this privilege satisfy the states continuing education requirements.

This compact will also NOT allow the state board to have disciplinary actions against these privilege holders for they are not licensed dentist or dental hygienist and so they will not be considered to be within the state board’s jurisdiction.

Military personnel and their family members will be exempt from fees ONLY while on active duty – no longer.

A Compact privilege will renew their status with the DDH not the state. This compact does NOT require a Home state. An applicant can get a license from another state, get a privilege in Maryland, and ultimately drop their home state license – where they can be disciplined.

As with both compacts fees are required to join. This compact SB 21 has loose, non-specific language about fees. See section 7 (E) (3) *“The commission may levy on and collect an annual*

*assessment from each participating state and impose fees on licensees of participating states when a compact privilege is granted...*” Thus, essentially leaving an open checkbook for the state, the dental board, and the licensed dentist or dental hygienist. As opposed to SB 538 Section 8 (B) *“A member state dental board issuing a compact license privilege authorizing practice in its state may impose a fee for a compact license privilege, for either initial issuance or any renewal.”* This compact has the potential to increase fees for every dentist and dental hygienist whereas the other compact will only incur fees to those who choose to participate.

Lastly, as a Pediatric Dentist, we are responsible for the well-being and safe care of the children of our state. Pediatric Dentists employ the use of Nitrous Oxide, sedation, general anesthesia and other behavior management techniques. I am aware that many other states take these treatment alternatives less seriously than we do here in Maryland. We have strict guidelines and permits are needed in our state to perform these services. I would be fearful of someone from another state, who does not possess the proper training or certification working on my child or yours. There is no defined rule as to whether or not privileged dentists or dental hygienists need to obtain said permits or certifications.

While we all agree that facilitating the interstate practice of dentistry and dental hygiene is important, we MUST agree that we need to do this safely and with the citizens of Maryland protected.

For these reasons, I urge you to vote in OPPOSITION of SB 21 – the Dentist and Dental Hygiene Compact.

Respectfully,

Dr. Shari C. Kohn

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Fellow - American Academy of Pediatric Dentistry

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Fellow - American College of Pediatric Dentistry

Fellow – International College of Pediatric Dentistry

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