

February 7, 2025

To: Senator Beidle, Chair Finance Committee and Senator Kramer -Sponsor
3 East Miller Senate Office Building
11 Bladen Street
Annapolis, MD 21401

RE: I support - SB0538 **Interstate Dental and Dental Hygiene Licensure Compact**,
IDHLC, protects citizens by upholding state licensure credentials and enables license
portability

I Oppose - Sb0021 Dental **and Dental Hygiene**, DDH compact, there are unexplained
details that are of significant concern to the public safety of Maryland citizens

Dear Senator Beidle, Senator Hayes, Senator Kramer and distinguished members of the
Finance Committee,

I am Betty Howard a registered 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 American
Dental Exam (ADEX) should be used to validate clinical competency.

Dental Hygienist's in Maryland work under the General Supervision of a dentist. One very
concerning aspect of SB0021 for me as a Maryland licensed Dental Hygienist, is who will
be responsible in an office with a DDH 'privileged' practitioner supervising? The MD State
Board of Dental Examiners, MSBDE, **only** has jurisdiction over licensees. If I am the only
MD licensed practitioner in that practice, will my license be sanctioned if someone is
harmd or has complaints about their care? Who is responsible? If I am at risk of being
responsible, perhaps I would give up my Maryland license and apply through the DDH
Compact for a privilege so as not to be held liable.

How will privileged practitioners be identified and regulated? Will Maryland's Board know
who is practicing in Maryland with a DDH Compact Privilege? What if a patient is harmed or
even loses their life under anesthesia in a facility? What recourse does the Board have to
regulate a compact "privileged" practitioner? There are unexplained situations in the DDH
Compact that are of concern. There is a danger of developing a dual level of dental
providers in MD.

A major difference in the AADB compact, SB0538 requires **ALL** participants to be **licensed**
in each state in which they will practice. They must adhere to the State Statute upholding
the standard of care delineated in their scope of practice and follow all rules and
regulations. A license is a **huge advantage** in protecting Maryland's Citizens.

1. Continuing competency, (CE) is an area MD takes very seriously. All states do not require the same number of Continuing Education for professional development.
2. Another concern is renewals of specialty permits, like general anesthesia, sedation permits or even drug dispensing permits. DH must apply with the required hours of training followed by CE credits for renewals to keep their LA permit.

How will a 'privileged' practitioner demonstrate credentials to hold these permits?

DDH 'privilege' practitioners will only be licensed in ONE state. The DDH Language only requires renewal in the Home State of the 'privilege' practitioner. They are required to only follow renewal guidelines in the **one state of Licensure**.

Section 13 of the DDH Compact states, "Any laws, Statues, regulations or legal requirements, in conflict with the DDH Compact are **SUPERSEDED** by the DDH Compact rules." This does not seem reasonable. The Commission has yet to define terms and develop "guidelines". This clause in the legislation gives a blank check to the Commission as it works to impact the practice of dentistry in all member states.

Maryland has high standards; I refer to them as "gold standards of licensure". Maryland licenses highly motivated and qualified applicants in order to better protect Maryland citizens. Our standards are more rigorous than many states in the country.

I Oppose SB0021 because of its vague language and undefined terms such as "clinical assessment". Serious issues are in question which seems to be unnecessary when requiring a license in each state changes the dynamics and has been protecting the public across the country for decades

I ask legislators to please take a stand to preserve Maryland's current standards. SB0538 clearly states the educational standards, the American Dental Examination as the threshold for validating clinical competency and other criteria Maryland already uses when licensing new applicants.

I urge members of the Finance Committee to vote to support SB0538.

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