

February 15, 2025

To: Delegate Pena-Melnyk, Chair HGO Committee

RE: HB534 protects citizens by upholding state licensure credentials and enables license portability
HB0045 poses unnecessary public safety risks

Dear Honorable Pena-Melnyk,

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 MSDBE **only** has jurisdiction over licensees. If I am the only MD licensed practitioner in a practice, if someone is harmed or has complaints about their care, will my license be sanctioned? Who is responsible? If I am at risk of being responsible, perhaps I would give up my Maryland license and apply thru the 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 "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, HB0534 requires **ALL** participant 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.

Continuing competency is an area MD takes very seriously, it is also an area states can differ greatly. MD requires 32 hours biennially for license renewals. Other renewals of permits for general anesthesia, sedation permits or even drug dispensing permits, as well as permits for DH to continue to administer LA, **All** require additional CE requirements. How will a privileged practitioner demonstrate credentials to hold these permits?

DDH privilege practitioners will only be licensed in ONE state. If that State CE requirement is less than the remote state they will only need to follow the renewal requirements of their one license.

Section 13 of the DDH Compact states, "Any laws, statutes, regulations or legal requirements, in conflict with the DDH Compact are **SUPERSEDED** by the DDH Compact rules."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 the "gold standards of licensure". It is intended to license highly motivated and qualified applicants in order to better protect Maryland citizens. Our standards are more rigorous than some, (many) states in the country.

I ask legislators to please take a stand to preserve our current licensing standards, rules and regulations for the profession of dentistry and support Maryland practitioners being licensed as stated in SB0538.

Very truly yours,
Betty Howard, BSDH, RDH
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