



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 25, 2025

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

Re: Senate Bill 749 – State Board of Dental Examiners – Applicants Licensed or Certified in Another State – Dental Board – Letter of Opposition

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

The Maryland State Board of Dental Examiners respectfully submits this letter of opposition for Senate Bill 749 – State Board of Dental Examiners – Applicants Licensed or Certified in Another State. The bill concerns dentists and dental hygienists who are licensed in another state and who wish to obtain a Maryland license, as well as dental radiation technologists who are certified in another state and who wish to obtain certification in Maryland. With regard to dentists and dental hygienists licensed in another state the bill adds the following subsection to the Ann. Code of Maryland, § 4-306: **“(F) IF AN APPLICANT MEETS THE REQUIREMENTS FOR LICENSURE UNDER THIS SECTION, THE BOARD SHALL ISSUE THE LICENSE WITHIN 15 BUSINESS DAYS AFTER RECEIVING THE COMPLETED APPLICATION.”**

The Board believes that the language is unnecessary as the Board presently issues Maryland licenses to out-of-state dentists and dental hygienists well within 15 business days of receipt of the last qualifying document. If an applicant submits an application with missing or illegible documentation, the applicant is notified almost immediately so that the error or omission may be corrected.

With respect to dental radiation technologists, the bill provides that an out-of-state dental radiation technologist shall be certified in Maryland if they have satisfied the examination requirements of certification in another state that the Dental Board determines is “comparable

to the examination requirement in this State.” Further, the bill provides that the applicant would be disqualified for certification in Maryland if the applicant has failed an examination for certification in Maryland.

The Board believes that it would be very difficult for it to determine whether an examination administered in another state is “comparable” to the examination administered for Maryland certification. In Maryland, an in-state applicant must pass the Radiation Health and Safety Examination administered by the Dental Assisting National Board. The examination questions are not available to the Maryland Board. In addition, the Dental Board doubts that other states that administer their own dental radiation technologist examination would be willing to share the questions with the Dental Board. For obvious reasons doing so in both instances may jeopardize the integrity of the examinations. That said, if the Board were privy to examination questions, a question-by-question comparison would be necessary and difficult given the ultimate goal of determining if the two examinations were comparable. However, In the final determination, the Board believes that the current regulations regarding requirements for out-of-state dental radiation technologist are easily met and are very fair. An out-of-state dental radiation technologist may obtain certification in Maryland if they complete an application, pay the required fee, and have “engaged in practicing dental radiation technology for at least 150 hours in the 3 years preceding application for certification in Maryland[;].” Code of Maryland Regulations 10.44.19.03B(2). Essentially, the applicant need only practice dental radiation technology for a month within 3 years of applying for certification in Maryland. The requirement is easily satisfied.

I hope that this information is helpful. If you would like to discuss this further, please contact me at 202-997-2606 or chiyo.alie@maryland.gov.

The opinion of the Maryland State Board of Dental Examiners expressed in this letter of opposition does not necessarily reflect that of the Department of Health or the administration.

Sincerely,
Chiyo Alie, D.D.S.
Chiyo Alie, D.D.S.
Board President