



Commissioned Officers Association of the United States Public Health Service

Protecting the interests of the USPHS Commissioned Corps since 1951

February 18, 2025

The Honorable Josephine A. Pena-Melnyk
The Honorable Bonnie Cullison
House Health and Government Operations Committee
240 Taylor House Office Building
Annapolis, MD 21401

Re: Subject: **Request for UNFAVORABLE Report – HB 534 – Interstate Dental and Dental Hygiene Licensure Compact**

Dear Chair Pena-Melnyk, Vice Chair Cullison and Members of the House Health and Government Operations Committee:

On behalf of the Commissioned Officers Association, I write to recommend a **UNFAVORABLE report** by the Committee on **HB 534 – Interstate Dental and Dental Hygiene Licensure Compact**

As you know, I am a long-time proponent of expedited licensure and compacts, however, in good faith, **I cannot support HB 534**, even though it encompasses all uniformed services; or the other compact **HB 045** which includes just Armed Forces and does not contain a spousal exemption.

HB 534 bill has many concerning factors:

- HB534 does not offer a clear path of licensure portability. Under this bill, State Dental Boards are **given broad-scale authority to reject applicants** from other States, with few guidelines in the bill defining the parameters Boards can use for rejections. In this way, **it is unclear as to whether the bill meets traditional portability standards for a Compact Agreement**.
- **HB534 has not been signed by any other state**. Compact participants may only benefit from a Compact if other states have agreed to pass the Compact AND the Compact Commission has stood up to create rules and the database. In my experience, it's 18-24 months AFTER the correct number of states join the compact before any benefit is experienced. That could be years from now given the flaws in this compact. While HB45 has 10 states who have signed, the **armed forces language is exclusionary**. Further, the absence of a spousal exemption (present in compacts before the DLSO funding), which allows spouses to declare and retain a "home state" or home of record, for the duration of the active-duty spouse's service, provides no license portability for them.

The process by which HB534 was drafted is unclear; it is not transparent what process they used to invite outside stakeholders. HB45 was developed over a course of 5 years with the Council of State Governments and the Department of Defense opening invite from many stakeholders. The American Dental Association, the American Dental Hygienists Association, and the American Student Dental Association, among others, provided input for HB45. The American Association of Dental Boards and individual State Dental Boards were invited to participate, but they declined

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- **HB534 does not create an independent body for data sharing and feedback**, rather relying on the Boards to work out regulations amongst themselves. Transparency is a concern.
- **HB534 requires the use of the ADEX dental exam**. Other exams have proven just as effective as proving competency, and we should not write ourselves into a box to require a single examination.

These concerns are just not mine alone. See the attached Analysis.

As a proponent of expedited licensure, I have examined both HB 534 and HB 045. Neither fits the bill of providing expedited licensure and certification for **ALL uniformed services**. Because both bills require passage of model language **without any changes**, I cannot support either bill.

As you well know, Maryland is home to the headquarters of both the U.S. Public Health Service AND the National Oceanic and Atmospheric Administration's Commissioned Corps. In addition to my headquarters, U.S. Public Health Service officers serve in the Department of Health and Human Services operating administrations including the National Institutes of Health, the Food and Drug Administration, the Health Resources and Services Administration, Substance Abuse and Mental Health Services Administration, as well as the Centers for Medicare and Medicaid Services, among others. **A large component of my Corps includes Dentists**. In addition, we also have a **few dental hygienists**. Certainly, many spouses, likely would **benefit from either expedited licensure or passage of appropriate compact legislation**. However, neither of these bills meet the needs of those in my service.

The Commissioned Officers Association of the U.S. Public Health Service ***cannot support HB 534 (or HB 045) and recommends an UNFAVORABLE report.***

The mission of the Commissioned Officers Association (COA) is to **protect and enhance the public health and safety of the United States** by supporting and advancing the interests of the Commissioned Corps and its officers through advocacy, education, training and dissemination of professional information. This includes the **1398 officers, 8 Ready Reservists and over 7,000 retirees living in Maryland**.

We wish to thank Delegate Hill for her consideration of service members and their families.

Respectfully,



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