



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Acting Secretary

**Maryland State Board of Dental Examiners
Spring Grove Hospital Center
Benjamin Rush Building
55 Wade Avenue/Tulip Drive
Catonsville, Maryland 21228**

March 17, 2021

The Honorable Delores G. Kelley
Chair, Finance Committee
3 East Miller Senate Office Building
Annapolis, Maryland 21401-1991

Re: SB 894-Post Crisis Jobs Act of 2021-Letter of Concern

Dear Chair Kelley and Committee Members:

The Maryland State Board of Dental Examiners is submitting this letter of concern for Senate Bill (SB) 894 - Post Crisis Jobs Act of 2021. The bill among other things, provides that an applicant for a license to practice a health profession including dentistry, or dental hygiene, may complete the educational, or training required to qualify for the license through a digital learning program if the digital learning program meets the program and accreditation requirements established under the Health Occupations Article. In addition, the bill provides that an applicant for the renewal of a license may complete any continuing education requirements through a digital learning program if the digital learning program meets the program and accreditation requirements established under the Health Occupation Article.

The Dental Board is concerned that the bill's ambiguity has the potential to allow individuals to seek dental or dental hygiene licenses without having any in-person instruction. Under the current law there are no entirely on-line programs that will lead to either a dental or dental hygiene license. Although accredited dental and dental hygiene schools offer a limited number of on-line courses, all require extensive in-person attendance, especially for clinical instruction.

On the one hand the bill may be interpreted to read that a license may be obtained through a digital learning program only if the digital learning program meets the accreditation requirements established under the dental laws. As stated, there are no entirely digital learning programs that lead to a dental or dental hygiene license. If there were such programs, then the law would be superfluous since the Dental Board and most, if not all other health occupations Boards, already accept programs that meet accreditation standards. There would simply be no void to be filled by SB 894.

Unfortunately, the bill could be interpreted to require the Board to accept an entirely digital learning program that has no in-person requirements if it otherwise allegedly meets “program and accreditation requirements.” In other words, if an on-line program claims that it can meet program and accreditation requirements” that have already been met by in-person accredited programs, the Board would be obligated to accept those entirely on-line programs as an avenue for licensure. This would of course lead to harmful results. Potential dental and dental hygiene school graduates who have had no in-person training would pose an obvious danger to anyone they would attempt to treat. All dental and dental hygiene programs are required to have and should continue to have extensive in person training to ensure competency and optimal care.

For these reasons, the Dental Board respectfully requests that the committee issue an unfavorable report for SB 894.

I hope that this information is helpful. If you would like to discuss this further, please contact me at 301-367-2352, jgoldsm217@comcast.net, or Dr. Arpana Verma, the Board’s Legislative Committee Chair at 240-498-8159, asverma93@gmail.com. In addition, the Board’s Executive Director, Mr. Frank McLaughlin may be reached at 443-878-5253, frank.mclaughlin@maryland.gov.

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

Sincerely,

JAMES P. GOLDSMITH, D.M.D.

James P. Goldsmith, D.M.D.
Board President