

Legislative Testimony
HB 5630 AAC The Establishment Of Licensure For An Advanced
Dental Hygiene Practitioner
Public Health Committee
Monday, March 16, 2009
Joint Testimony

We submit this written testimony concerning HB 5630. We speak on behalf of the many past State Dental Commissioners who over the years have been completely frustrated with the current system, and quietly resigned due to the onerous circumstances. All have served on the CT State Dental Commission and currently serve as dental board examiners for the Northeast Region.

Together, we share serious concerns over this proposed bill. Our primary issues are the protection of the public and the examination and regulation of all dental providers in CT. We believe that, in order to practice clinical dentistry in this state, one should attend an accredited dental school and pass a minimal clinical competency skills dental examination. In order to practice dental hygiene, one should attend an accredited dental hygiene school and also pass the existing minimal clinical competency hygiene examinations. HB 5630 sadly does not provide for any clinical testing nor does it have any true regulation or oversight for this controversial new class of dental provider, the Advanced Dental Hygiene Practitioner (ADHP).

We also share serious concerns with the regulatory process in CT, not just with respect to what might occur with this new group of potential dental providers in HB 5630, but more importantly, as it currently exists with dentists in this state. In our opinion, the current regulatory system involving the CT State Dental Commission and the Department of Public Health is significantly broken and is in need of serious repair and revision. Having the language in this bill and in Chapter 379 of the General Statutes that states that the Commissioner of Health seeks only "advice and consultation" from the Dental Commission before issuing regulations, may sound good on paper, but is far from operational reality. In fact, we would testify that the Commissioner of Public Health, over the past twenty plus years, has rarely asked for consultation from the CT State Dental Commission, and has frequently ignored the advice the Dental Commission has offered. The unanimous advice in 2004 from the CT Dental Commission to the Commissioner of Public Health was for the DPH to maintain the required minimal clinical skills competency exam for dental licensure in this State and not to adopt any new "alternative routes" for licensure in order to protect the public. That advice fell upon deaf ears and dentists may now opt for completion of a one year Post Graduate training (PGY1) as an alternate route to licensure in lieu of the previous required clinically-based examinations. Additionally, you must be advised that this pathway to licensure is not currently respected by other state

licensing jurisdictions other than NY. How are any regulatory routes for licensure in this bill possibly valid when the Commissioner of Public Health fails to seek the required advice from the Dental Commission? Even if advice is sought, it sadly carries little weight under the current system. The Commissioner may simply choose to ignore all advice as our present system allows.

Most importantly, this bill does not offer any protection of the public. It does not propose testing of these new potential dental providers prior to entry into the marketplace. It places all regulatory aspects in the hands of the Commissioner of Public Health, who, in fact, fails to respect and seek advice or assistance from the CT State Dental Commission. Our state is unlike any other in the country with respect to dental regulation; it is a unique and significant outlier in most licensing and regulatory functions. Does that make any sense at all? We need to revisit these issues and look to model ourselves after other states in the best interest of the protection of the public welfare.

We suggest this bill not go forward until a complete and comprehensive review of the Dental Commission, the entire state dental regulatory process, the dental disciplinary process, and the current examination process for dental and auxiliary licensure and credentialing takes place. Not just for this new class of "advanced" practitioners, but this is required and necessary for all dental practitioners in the State of Connecticut: dentists, dental hygienists, dental technicians, and dental assistants.

Until these chronic, ongoing problems are addressed, we cannot support another class of dental provider in this State. The signatories below ask that we work together to revise the legislation and rules that exist today before rendering any decision on additional initiatives that should, in fact, **MUST** include appropriate regulation of new provider classifications. The public deserves this protection and deserves dental providers who have been properly educated, tested, and disciplined when necessary. Legislative revision of the current system is what should be on the table, not this bill.

Respectfully submitted,

Dr. Roger Ostrander Jr., past Chair and past member of the State Dental Commission

Dr. Bernie Unger, past Chair and past member of the State Dental Commission

Dr. Martin Rutt, past Chair and past member of the State Dental Commission

Dr. David Lynch, past member of the State Dental Commission

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Dr. Carolyn Malon, past member of the State Dental Commission

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