

Legislative Testimony
Public Health Committee
HB5541 AAC Services Provided by Dental Professionals and Certification for Advanced
Dental Hygiene Practitioner
Wednesday, March 21st, 2012
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Senator Gerratana, Representative Ritter and members of the Public Health committee, my name is Dr. Steven Hall and I have been practicing dentistry for 15 years in the town of Farmington. Additionally, I am a part-time Clinical Instructor at the University of Connecticut, School of Dental Medicine. I have also served on the CT Mission of Mercy steering committee since its inception, and I have provided countless hours of pro-bono and reduced cost care to people in my community. I thank you for the opportunity to present this written testimony to you in opposition to HB 5541.

I would like to start out by stating that as a product of the Department of Public Health's scope of practice process, for which my professional organization supported, I am in support of allowing hygienists to perform Interim Therapeutic Restorations (IRT) as referenced briefly in line 223 of this bill, and for allowing hygienists and dental assistants to become Expanded Function Dental Auxiliaries (EFDA) which is in section 2 of this bill. These are competencies and roles that numerous states already allow for and could have an immediate impact on access and utilization. However, I am staunchly opposed to sections 3 through 6 which attempt to create an "Advanced Dental Hygiene Practitioner."

I have several concerns with HB5541 that compel me to write your committee to gain your opposition to this bill. The educational component of ADHP is substandard. The accreditation of ADHP is not acceptable, and there is no oversight at the state level of this new dental provider.

As a clinical instructor at the UConn Dental School, I see first-hand the level of education and the amount of chair side instruction that is needed to create dental professionals. The proposed ADHP curriculum falls far short of the needed education to create a new dental provider. The ADHP curriculum is a fox in the henhouse. The American Dental Hygiene Association created their own curriculum for the ADHP, and with no oversight by a national accrediting agency they are selling this to the Public Health Committee as if it is a vetted and proven curriculum. Only the Commission of Dental Accreditation (CODA) can do this which consists of dentists, hygienists, dental assistants and non-dental professionals. There was no oversight by CODA to accredit this curriculum, yet the ADHP proponents want the Board of Governors of Higher Education to oversee and accredit a dental curriculum for which they have no basis in knowledge nor are they experienced in how a dental education is run.

The Commission on Dental Accreditation is nationally recognized by the United States Department of Education (USDE) to accredit dental and dental-related education programs conducted at the post-secondary level. CODA accredits the UConn School

of Dental Medicine, Fones School of Dental Hygiene at the University of Bridgeport, Tunxis Community College dental hygiene program as well as dental assisting program, the University of New Haven dental hygiene program, and ALL dental schools and post-doctoral dental residency programs in the US and Canada.

Why is it that HB5541 uses the Board of Governors of Higher Education to accredit the ADHP curriculum? According to its own website (www.ctdhe.org), the mission of the board is "to promote a post-secondary system of distinctive strengths which, through overall coordination and focused investment, assures state citizens access to high quality educational opportunities, responsiveness to individual and State needs, and efficiency and effectiveness in the use of resources." Whereas the mission of CODA is "to serve the public by establishing, maintaining, and applying standards that ensure the quality and continuous improvement of dental and dental-related education and reflect the evolving practice of dentistry." The Board of Governors of Higher Education does not have the expertise that CODA does to properly accredit a new dental provider and a new dental curriculum. It is one thing to create a new dental provider, but it is disturbing that these new providers will be held to a lesser standard than the dentists, dental hygienists and dental assistants are in Connecticut and in the rest of the country. USDE recognizes CODA as the accrediting agency for all dental education, the State of Connecticut should also.

An ADHP is a hygienist who with extra training can do dentistry. They would be allowed to diagnose dental disease, drill and fill teeth, extract teeth, prescribe medication and perform other aspects of dentistry that only a dentist can now perform. Yet it is disturbing that they do not have any competency exam to practice dentistry as does a new dentists. They still see themselves as hygienists and outside the oversight of the Dental Commission. Any person practicing dentistry in the State of Connecticut needs to be held to the same standard. The public needs to know that whether they see a dentist or an ADHP that they are assured of the same level of care. Currently, HB5541 sets two levels of care. Dentists who have proper education and training followed by proper state competency evaluations and state oversight by a Dental Commission. Or ADHPs who have substandard education and training followed by NO state competency evaluation and NO oversight by a state Dental Commission.

Because of the serious concerns with HB5541, I believe that the ADHP model proposed is not in the best interest in the citizens of Connecticut and needs to be opposed.

In closing, I would like to again respectfully thank the members of the Public Health committee for allowing me to submit this testimony and would urge you to oppose this bill. If you should have any questions I will do my best to make myself available at your convenience.

Sincerely,

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