Limited License Registration in Dentistry

“Preserving a Valuable Resource – Ensuring Access to Care”

Access to Dental Care

Poor oral health has been associated with serious health problems such as diabetes, heart disease, stroke, oral cancer, and adverse pregnancy outcomes. Good oral health is an important component of overall health and access to affordable, regular dental care is essential to maintain good oral health. In Massachusetts there is a mal-distribution of dentists that leaves many areas of the state without adequate numbers of dentists to provide access to care, especially for important specialty services such as oral surgery and pediatric dentistry. Additionally, 2.3 million Massachusetts residents do not have dental insurance and may face other barriers to access to dental care. Low income and minority groups, including the elderly, disabled, homeless, refugees, and immigrants, face the largest burden of oral disease and they generally have the least access to dental care. For the past decade, the Commonwealth has worked to develop a network of dental safety-net providers, primarily Community Health Centers (CHCs), dental schools, and hospitals, to provide affordable, culturally sensitive, linguistically appropriate, quality care. As may be expected, there is considerable demand for services at these sites and patients may face a wait of several months for an appointment. Recruiting and maintaining dental professional staff at safety net sites is a critical factor to maintain access to care for many of the Commonwealth’s most vulnerable residents.

What is the issue?

Current Massachusetts General Law concerning limited license registration of dentists (MGL Chapter 112 Section 45A) and supporting dental licensing regulations are making it difficult for CHCs to maintain their most experienced staff. The law requires limited license registered dentists at CHCs to take a costly and time consuming licensing board after five years of continuous practice in order to maintain their limited license registration. Full time dental college faculty do not face this challenge.

Limited license registration is an extremely important mechanism for Massachusetts’ dental colleges and hospitals/CHCs to recruit and retain qualified faculty and dental staff. Limited license registration allows our dental colleges to recruit experienced dental faculty and researchers, with diverse backgrounds, from other geographic areas to fill critical education positions without fulfilling the requirements of full licensure in Massachusetts. It allows Massachusetts dental colleges to attract qualified post-doctoral students for dental advanced and specialty training and allows them to practice more independently during their training. Limited license registration allows the important safety net of hospital and CHC dental departments to recruit and retain culturally diverse dental providers with the backgrounds necessary to provide quality care in those settings. Currently there are approximately 243 dental
faculty and 45 dental professionals practicing in hospitals and CHCs in Massachusetts with limited licenses.

Dental colleges and hospitals/CHCs are an important source of access to dental care for many of the most vulnerable residents of the Commonwealth, who face financial, physical, geographic and health related barriers to accessing care in the private dental setting. This safety net of providers is a source of quality care that complements the private practice of dentistry. After 5 years of continuous practice in a highly regulated clinical setting, with formal quality control mechanisms in place, the ability to pass a licensing board does not provide any further useful information about the clinical skill of a provider and only serves as a barrier to care for the many vulnerable individuals whose dentist is away preparing for and taking the board or who leaves a position at a safety net site.

Who are Limited License Registration Dentists?
Limited license registrant dentists are graduates of a reputable dental college, defined by **MGL Chapter 112 Section 46**, who practice dentistry under the direction of a licensed dentist at an accredited dental college, or in a dental advanced/specialty training program, or in a hospital/CHC maintained or incorporated by the Commonwealth of Massachusetts. Dentists with limited license registration may not practice in a private dental setting and may only participate in the intramural group practices that are operated by non-profit dental clinics, educational, or research institutions and their affiliated hospitals. Limited licenses are renewed annually and are limited to five years unless an applicant passes a clinical exam administered by the Massachusetts Board of Registration in Dentistry (BORID) or is a full time faculty member of a dental college. Currently there are three accredited dental colleges, one dental research institution, thirty four CHCs, and nine hospitals (some include the aforementioned CHCs under their licensure) that provide dental services in the Commonwealth (source: Massachusetts Department of Public Health).

**Limited License Registration at Dental Colleges:**
Faculty dentists with limited license registration work under the direction of a Massachusetts licensed dentist. These dentists provide classroom and clinical instruction to future dentists, perform research, and treat patients within the dental school’s clinics. They perform the same duties as fully licensed faculty dentists. A faculty limited license registration must be renewed annually, but can be renewed indefinitely. These dentists are never required to take the Dental Board Exam to continue in their positions. As of June, 2006 there were 243 active faculty with limited license registration in Massachusetts.

**Limited License Registration at Community Health Centers/Hospitals:**
Dentists with limited license registration employed by Hospitals/CHCs work under the direction of a Massachusetts licensed dentist. These dentists provide the same dental services as fully licensed CHC dentists with the exception of clinical director. Dentists with CHC
limited dental license registration must renew annually, for a maximum of five years. After five years, they must pass a Dental Board Exam. As of June, 2006 there were 45 dentists working in 19 CHCs with limited license registration (34 CHC’s and 9 hospitals in Massachusetts provide dental services). Dentists enrolled in postdoctoral training programs and internships in dental colleges and hospitals also may hold limited license registration during their training, if they are not licensed in Massachusetts. The limited license registration must be renewed annually.

At Stake: Quality of Care & Cultural Competency
Dental colleges and hospitals/CHCs are regulated by the American Dental Association (ADA) Commission on Dental Accreditation or the Massachusetts Department of Public Health. Accreditation or licensure from either entity requires strict adherence to policy and procedure standards, excellent record keeping standards, and infection control standards. Both require a detailed credentialing process for providers. Many hospitals and CHC’s are also accredited by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) which adds further assurance of quality and safety. MGL Chapter 112 Section 46 defines the charter, course content, and duration of training of reputable dental colleges. Dental colleges and hospitals/CHCs follow those definitions to credential their staffs. In dental colleges and hospitals/CHCs, limited license registration dentists work under the direction of a fully licensed department chair or dental director who reports to a Dean or CEO/medical director. That reporting structure ensures that quality is maintained and leaves the directing dentists accountable for the professional conduct of the limited license registered dentists in their employ.

Individuals who seek care at safety net sites are generally a culturally and linguistically diverse population and often face socioeconomic and health related challenges. Frequently, dentists working in CHCs with limited license registration share a common cultural background and language with their patients. Those similarities facilitate the provision of high quality care for populations who may otherwise not receive services. Dentists working in CHCs with limited license registrations report speaking 15 different languages. The entire community benefits when oral health problems are prevented or treated early, allowing residents to achieve their full potential at work and at school, and avoiding expensive emergency room visits. This safety net of providers is a source of quality care that complements the private practice of dental care.

What Must Change?
The proposed change to MGL Chapter 112 Section 45A would eliminate the need for dentists working in CHCs to take a dental board after 5 years. This would allow dentists with limited licenses registration at both dental schools and CHCs to be held to the same standards and requirements. CHCs would no longer be at risk of losing their most experienced dental providers simply because an arbitrary time limit has expired. Rather, CHC dental providers will continue to provide culturally and linguistically appropriate, high quality dental care to the most vulnerable residents of Massachusetts.

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