



AMERICA'S PEDIATRIC DENTISTS
THE BIG AUTHORITY on little teeth®

July 2, 2024

The Honorable Christina Henderson
Chair, Committee on Health
1350 Pennsylvania Avenue NW, Suite 402
Washington, DC 20004

Dear Chair Henderson:

On behalf of the American Academy of Pediatric Dentistry (AAPD)¹, I am writing in strong opposition to B25-0632, the Dental Specialties Licensure and Scope of Practice Amendment Act. **If passed, this bill would significantly diminish patients' access to dental care and endanger patient safety in the District of Columbia.** The Act would have an adverse impact on the health and well-being of DC residents by triggering an exodus of approximately half of the specialist dentists currently practicing in DC, and by preventing early career specialists from practicing in DC upon completion of a specialist residency program.

The Act would require all specialist dentists to hold a current certification from a recognized dental specialty certifying board (new Sec. 508c.2) in order to be eligible for licensure. While pediatric dentists have among the highest percentage of board certification among dental specialists, it clearly falls short of 100%.

If this legislation were to pass, patients who require specialized care, often to treat the most severe oral health conditions, would be forced to wait longer to receive treatment and may need to travel outside the District to receive that care. In addition to worsening oral health conditions, longer wait times also can have an impact on patients with health conditions that are not specifically related to oral health. For example, those who are preparing to undergo certain surgical procedures may require treatment and ultimately clearance from a dental specialist. Longer wait times could delay surgery and affect the prognosis for the patient. This legislation would be a significant regression in addressing

¹ The American Academy of Pediatric Dentistry (AAPD), founded in 1947, is the not-for-profit professional membership association representing the specialty of pediatric dentistry and is the recognized authority on children's oral health. As advocates for children's oral health, the AAPD promotes evidence-based policies, best practices, and clinical guidelines; educates and informs policymakers, parents and guardians, and other health care professionals; fosters research; and provides continuing professional education for pediatric dentists and general dentists who treat children. Its 11,000 members put children first in everything they do, and at the highest standards of ethics and patient safety. Pediatric dentists provide care to millions of our nation's infants, children, adolescents, and persons with special health care needs, and are the primary contributors to professional education programs and publications on pediatric oral health.

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patients' access to care by forcing families and patients to travel farther and wait longer to see a licensed dentist specialist, potentially resulting in them having poor health outcomes or forgoing dental care all together.

This legislation will also add administrative burdens on pediatric dentists who are board-certified, requiring them to acquire an extra license within the District. This proposal diverges from licensure norms observed nationwide for both dental and physician specialties. Physician specialists in the District, who undertake procedures with higher risks to life compared to dental specialists, are not subjected to these excessively cumbersome licensure demands.

Therefore, the AAPD strongly opposes the proposed legislation because it will jeopardize the DC dental workforce and drastically limit patients' access to critical oral health treatment and procedures.

Please feel free to contact C. Scott Litch, AAPD Chief Operating Officer and General Counsel, at slitch@aapd.org or 773-938-4759 if you have any questions concerning this letter.

Sincerely yours,



Scott D. Smith, DDS
President

Cc: Dr. John S. Rutkauskas, Chief Executive Officer
Dr. Paul S. Casamassimo, Chief Policy Officer
Dr. Anupama Tate, Public Policy Advocate, DC Academy of Pediatric Dentistry
C. Scott Litch, Chief Operating Officer and General Counsel