



June 17, 2020

TO: Rep. Jason Sheppard, Chair and members
House Government Operations Committee

FROM: Amy Zaagman, MCMCH Executive Director

RE: HB 5827

SUSTAINING MEMBERS

Beaumont Children's Hospital

Children's Hospital of
Michigan/Detroit Medical Center

Henry Ford Health System

Hurley Medical Center

University of Michigan C.S. Mott
Children's Hospital and Von
Voigtlander Women's Hospital

CONTRIBUTING MEMBERS

Michigan Section, American
Congress of Obstetricians and
Gynecologists

Mott Children's Health Center

School-Community Health
Alliance of Michigan

PARTNERING MEMBERS

Calhoun County Public Health
Department

Health Department of Northwest
Michigan

Inter-Tribal Council of Michigan

Michigan Association for Infant
Mental Health

Michigan Breastfeeding Network

Michigan School Health
Coordinators' Association

Michigan State Medical Society

Washtenaw County Public
Health

GENERAL MEMBERS

Maternal-Newborn Nurse
Professionals of Southeastern
Michigan

Michigan Association of School
Nurses

Michigan Chapter, National
Association of Pediatric
Nurse Practitioners

Nurse Administrators Forum

EXECUTIVE DIRECTOR

Amy Zaagman
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We request your support of House Bill 5827 to correct a technical issue identified during the process of crafting licensing rules for dental therapists (DT) in the state of Michigan.

In PA 463 of 2018, a dental therapist is required to complete 500 hours of procedures directly supervised by a licensed dentist. Under the licensing rules as currently proposed, those hours would be completed as a component of the dental therapist's education. LARA held a rules workgroup with all stakeholders represented, including those organizations that did not support the licensure legislation, and all members of the rules workgroup agreed that including the directly-supervised hours within the DT educational program as the most feasible mechanism to fulfill the requirement.

This means a DT would complete 500 directly supervised hours (defined as the dentist physically present in the room) as part of their education in a program that meets the Commission on Dental Accreditation standards for dental therapy. When they graduate and pass their Board of Dentistry approved exams, as well as any other requirements in the rules, they will be fully licensed.

As a reminder: when a DT goes out to practice in an office or a clinic, they will always have a supervising dentist and that dentist will decide which procedures the DT may perform on which patients, directly or indirectly supervised, through a written practice agreement.

In proposed rule R 338.11218 (1)(c) that details how the 500 hours will be documented, **LARA legal staff are relying on the language in MCL 333.16651, and because "dentist" is a defined term in the Public Health Code they have indicated that it can only mean a dentist licensed in Michigan.**

This would essentially mean the 500 directly supervised hours must be completed in this state, or if the person attends school out of state they would have to seek licensure in that state and apply for reciprocity to Michigan. It would prevent a Michigan resident from going out of state for school (say to Minnesota) and then returning here to be licensed (presuming that out of state schools would not have Michigan-licensed dentists on staff). We do not believe this is in keeping with the legislative intent to expand our dental workforce to provide services to underserved populations while also providing career opportunities to Michigan residents.

We believe HB 5827 corrects this issue by amending MCL 333.16651 to ensure that the required hours may be supervised by a dentist licensed in the state where the educational program is located.

