



MISSOURI HOUSE OF REPRESENTATIVES  
**WITNESS APPEARANCE FORM**

BILL NUMBER: <b>HB 2075</b>		DATE: <b>1/9/2024</b>
COMMITTEE: <b>Professional Registration and Licensing</b>		
<b>TESTIFYING:</b> <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
<b>WITNESS NAME</b>		
<b>INDIVIDUAL:</b>		
WITNESS NAME: <b>ARNIE C. "HONEST-ABE" DIENOFF-STATE PUBLIC ADVOCAT</b>		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:	STATE:	ZIP:
EMAIL: <b>arniedienoff@yahoo.com</b>	ATTENDANCE: <b>In-Person</b>	SUBMIT DATE: <b>1/9/2024 11:38 PM</b>
<b>THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.</b>		

Dentist and Dental Hygienist Compact Commission is "Apples To Apples" with current Missouri Standards. These appear to be outlined in the "Compact Agreement" that MUST be approved by eight (8) State Legislatures. Three (3) States have agreed. I propose an Amendment that the Fee for License be waived if your spouse was transferred and assigned to a Missouri Military Base or Military Post in the State of Missouri. Disciplinary Actions MUST be Disclosed to Investigators of the Missouri Dental Board. Let's get this Legislation to the State Senate and onto the Governor's Desk by March 1st.



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<b>WITNESS NAME</b>		
<b>REGISTERED LOBBYIST:</b>		
WITNESS NAME: <b>CHRIS ROEPE</b>		PHONE NUMBER: <b>816-294-0497</b>
REPRESENTING: <b>ASSOCIATION OF DENTAL SUPPORT ORGANIZATIONS</b>		TITLE:
ADDRESS: <b>205 EAST CAPITOL AVENUE, # 100</b>		
CITY: <b>JEFFERSON CITY</b>		STATE: <b>MO</b>
		ZIP: <b>65101</b>
EMAIL:	ATTENDANCE:	SUBMIT DATE: <b>1/9/2024 12:00 AM</b>
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<b>WITNESS NAME</b>			
<b>BUSINESS/ORGANIZATION:</b>			
WITNESS NAME: <b>DIANN BOMKAMP</b>		PHONE NUMBER: <b>314-432-7719</b>	
BUSINESS/ORGANIZATION NAME: <b>MISSOURI DENTAL HYGIENISTS ASSOCIATION</b>		TITLE: <b>LEGAL CHAIRPERSON</b>	
ADDRESS: <b>612 FAIRWAYS CIRCLE</b>			
CITY: <b>ST LOUIS</b>		STATE: <b>MO</b>	ZIP: <b>63141</b>
EMAIL:	ATTENDANCE:	SUBMIT DATE: <b>1/9/2024 12:00 AM</b>	
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<b>WITNESS NAME</b>		
<b>REGISTERED LOBBYIST:</b>		
WITNESS NAME: <b>GARY HARBISON</b>		PHONE NUMBER: <b>573-418-2060</b>
REPRESENTING: <b>MISSOURI COALITION FOR ORAL HEALTH</b>		TITLE: <b>EXECUTIVE DIRECTOR</b>
ADDRESS: <b>PO BOX 1432</b>		
CITY: <b>JEFFERSON CITY</b>		STATE: <b>MO</b>
		ZIP: <b>65102</b>
EMAIL: <b>harbison@oralhealthmissouri.org</b>	ATTENDANCE: <b>In-Person</b>	SUBMIT DATE: <b>1/9/2024 8:17 AM</b>

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The Missouri Coalition for Oral Health, a non-profit dedicated to improving Missouri oral health, supports HB 2075 because it will lead to increased access to care through removing barriers to care provision by dental professionals from other states. Access to dental care is impacted by a limited number of providers throughout Missouri, but most acutely felt in rural areas of the state. Passage of HB 2075 will help to increase access to oral health care, an essential health care need. Good overall health is not possible without good oral health.



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<b>WITNESS NAME</b>			
<b>BUSINESS/ORGANIZATION:</b>			
WITNESS NAME: <b>JESSICA THOMAS</b>		PHONE NUMBER: <b>502-403-9728</b>	
BUSINESS/ORGANIZATION NAME: <b>THE COUNCIL OF STATE GOVERNMENTS</b>		TITLE: <b>POLICY ANALYST</b>	
ADDRESS: <b>1776 AVENUE OF THE STATES</b>			
CITY: <b>LEXINGTON</b>		STATE: <b>KY</b>	ZIP: <b>40511</b>
EMAIL:	ATTENDANCE:	SUBMIT DATE: <b>1/9/2024 12:00 AM</b>	
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<b>WITNESS NAME</b>		
<b>REGISTERED LOBBYIST:</b>		
WITNESS NAME: <b>JORGEN SCHLEMEIER</b>		PHONE NUMBER: <b>573-634-4876</b>
REPRESENTING: <b>MISSOURI DENTAL ASSOCIATION</b>		TITLE:
ADDRESS: <b>213 E. CAPITOL AVE.</b>		
CITY: <b>JEFFERSON CITY</b>		STATE: <b>MO</b>
		ZIP: <b>65101</b>
EMAIL:	ATTENDANCE:	SUBMIT DATE: <b>1/9/2024 12:00 AM</b>
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<b>WITNESS NAME</b>			
<b>BUSINESS/ORGANIZATION:</b>			
WITNESS NAME: <b>RICHAEL COBLER</b>		PHONE NUMBER: <b>785-806-0137</b>	
BUSINESS/ORGANIZATION NAME: <b>CENTRAL REGIONAL DENTAL TESTING SERVICE, INC. (CRDTS)</b>		TITLE: <b>EXECUTIVE DIRECTOR</b>	
ADDRESS: <b>1725 SW GAGE BLVD.</b>			
CITY: <b>TOPEKA</b>		STATE: <b>KS</b>	ZIP: <b>66606</b>
EMAIL: <b>richael@crdts.org</b>	ATTENDANCE: <b>Written</b>	SUBMIT DATE: <b>1/8/2024 10:40 PM</b>	

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Central Regional Dental Testing Service, Inc. (CRDTS) January 8, 2024 The Honorable Chairman Jeff Coleman and Honorable Members of the Missouri House Professional Registration and Licensing Committee Missouri State Capitol 201 W. Capitol Avenue Hearing Room 1 Jefferson City, MO 65101 Re: Informational Testimony/ Missouri H.B. 2075 (Dental Professions) Dear Chairman Coleman and Honorable Members of the Missouri House Professional Registration and Licensing Committee, Thank you for the opportunity to provide information regarding HB 2075 – Dentist and Dental Hygienist Compact. I am the Executive Director of CRDTS, a national dental testing service entity. Through our work with state dental boards, CRDTS develops and administers dental and dental hygiene examinations in Missouri and across the country which serve as an essential pathway towards licensure for dental candidates in 39 of the 48 states that accept clinical licensure examinations as a pathway toward licensure. CRDTS’ governing board consists of 23 state dental board representatives from across the nation including the Missouri Dental Board. CRDTS has been providing excellence in dental and dental hygiene testing since the late 1960’s, working with state dental boards to ensure the highest standards, validity and relevance in clinical examinations as a pathway toward licensure. For more than fifty years, clinical testing has been determined to be a matter of public safety in the U.S. for assessing the readiness of graduating dental and dental hygiene students to begin practicing. As an agency whose mission is to assist the state dental boards in protecting the health, safety, welfare of the public through the development and administration of examinations that assess clinical competency, we understand the importance of competency assessment in dentistry. Having also worked with dental schools, dental hygiene programs and graduating students for more than fifty years, CRDTS also understands the importance of portability. However, each state in the U.S. except one, has laws in place for licensure through credentialing which enable the state dental boards to retain authority over licensees while at the same time allowing portability of licensure. The compact currently being introduced through passage of HB 2075 may remove Missouri’s ability to establish and enforce minimum standards of competency through licensure. While there are a number of concerns with the current compact as introduced, we would like to leave you with three main takeaways: public safety; loss of state control; and the cost to states and licensees. **PUBLIC SAFETY DEMANDS RETENTION OF A PSYCHOMOTOR/HAND SKILLS COMPONENT** The vast majority of states in the U.S. have required some form of a psychomotor or hand skills component as part of an acceptable licensure examination for nearly half a century. Approximately four years ago the Dental Licensure Objective Structured Clinical Examination (DLOSCE) was introduced as a stand-alone written examination that does not require a hand skills or psychomotor assessment as part of the examination. Today, only six states accept the DLOSCE examination as a pathway toward licensure and some of those six states still require a hand skills assessment in addition. Passage of HB 2075 in its current

form could result in licensees being able to practice in Missouri without having first demonstrated the essential hand skills or psychomotor skills needed to competently practice dentistry or dental hygiene even though Missouri laws requires such hand/psychomotor skills assessment. Nearly every state in the U.S., including Missouri, has identified a psychomotor/hand skills assessment as a necessary and critical component in clinical licensure examinations. If the current form of HB 2075 is passed without modification, the Missouri public is at risk of receiving dental services from a licensee that has only passed a written-only examination with no psychomotor or hand skills assessment. This would be a substantial and significant change in Missouri's dental licensing laws and poses a safety risk to Missouri's citizens. Said another way, CRDTS and its governing board is concerned that HB 2075 (in its current form) could open the door to licensees being licensed to practice in Missouri without having first passed a clinical examination that has a hand skills or psychomotor skills component. Failure to continue to require such a clinical examination for Missouri dental and dental hygiene applicants as an essential element of a pathway to licensure puts public health at risk.

**LOSS OF LOCAL STATE CONTROL** Missouri understands that all health care is local. Consequently, the Missouri Legislature has taken great care to pass legislation that is in the best interest of its citizens and preserves the State's right to pass laws that are in the best interests of the Missouri public. HB 2075 poses a threat to Missouri's rights to continue to protect the interests of its citizens and would abdicate Missouri's control over dental and dental hygiene examination and licensure to a national "Commission". HB 2075, 333.740, 2. states: "The Rules of the Commission shall have the force of law in each Participating State, provided however that where the Rules of the Commission conflict with the laws of the Participating State that establish the Participating State's Scope of Practice as held by a court of competent jurisdiction, the Rules of the Commission shall be ineffective in that State to the extent of the conflict." Consequently, if the State believed that the Rules of the Compact Commission conflicted with Missouri's Scope of Practice laws, Missouri would be forced to seek remedy through the court system and obtain a court's opinion to that effect. Meanwhile, some number of dentists and dental hygienists licensed through the compact would be able to continue to treat Missourians even though the State of Missouri believed such individuals were not acting within the scope of their licenses. Additionally, because Missouri requires supervision of a dental hygienist by a dentist who is duly registered and currently licensed in Missouri (Title XXII OCCUPATIONS AND PROFESSIONS; Chapter 332.311) there is a question as to the ability for a licensed dentist to supervise an unlicensed dental hygienist who is practicing under the compact privilege. **THE COMPACT THAT WOULD BE CREATED THROUGH HB 2075 MAY NOT ACHIEVE ITS TOUTED COST SAVINGS AND INCREASED WORKFORCE** HB 2075, 332.700 (2) states that the compact "[p]romotes mobility and addresses workforce shortages..." and "[i]ncreases public access to qualified, licensed Dentists and Dental Hygienists...." CRDTS is not aware of any reliable evidence that compacts increase the number of practitioners in a particular state. In fact, Missouri already enjoys portability through a relatively low-cost process under Title XXII OCCUPATIONS AND PROFESSIONS; Chapter 332.311; Registration and licensing without examination, requirements, fee which is designed to offset workforce shortages. In contrast to the relatively low cost of licensure by credentialing, Missouri's licensees and Missouri would bear an undetermined amount to create and administer the compact and the coordinated database. HB 2075, 332.715, 1. (4) provides that in order to obtain and exercise a compact privilege a Licensee shall "[p]ay any applicable Commission and Remote State fees." Additional fees may affect a licensee's motivation to obtain licensure through the compact. With the fees yet to be determined there is no way to quantify the cost of the compact or its ability to positively impact public access and workforce shortages in the field of dentistry. Thus, if that is the purpose of the compact, the State of Missouri should evaluate the costs and effectiveness of the proposed compact against the tried-and-true success of existing portability laws, e.g., Registration and licensing without examination, requirements, fee. Missouri already has effective, efficient laws for licensure that also maintain the standards necessary for dentists and dental hygienists who treat patients in the state. A compact may complicate the process and may not be a cost-effective mechanism for addressing any workforce shortage concerns. As currently drafted, HB 2075 risks reduction of Missouri's public safety dental standards, abdication of the state's right to control the laws and rules impacting the health of Missourians and may increase and complicate the financial and administrative burden dental applicants face in pursuing licensure in Missouri. On behalf of CRDTS and our Members, we urge the Committee to take additional time to study the examination process and portability prior to the passage of a significant change in licensure laws such as HB 2075. CRDTS would be happy to serve as a resource for additional information and interim study.

Respectfully Submitted, Richard L. Cobler  
Richard L. Cobler  
CRDTS Executive Director