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The mission of ADEA is to lead and support the health professions community in preparing future-ready oral health professionals.

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April 9, 2020

The Honorable Larry Hogan  
Chair  
National Governors Association  
444 North Capitol Street  
Suite 267  
Washington, D.C. 20001

Dear Governor Hogan:

The American Dental Education Association (ADEA) is The Voice of Dental Education. ADEA members include all 68 U.S. dental schools, over 1,000 allied and advanced dental education programs, over 60 corporations and more than 20,000 individuals. As the sole national organization representing academic dentistry, we ask you to encourage governors to suspend or modify existing state-level examination restrictions that prevent graduating dentists, dental hygienists and other oral health professionals from serving their communities during this pandemic crisis. It is vital for governors to remember that oral health is essential to overall health, as heart disease, diabetes, and certain cancers are often first detected in oral care.

All states require candidates for initial licensure in dentistry and dental hygiene to pass an examination demonstrating clinical ability before they can be licensed. In many states, this exam must be administered by one of several testing agencies that require treatments to be demonstrated on live patients and evaluated. Due to the COVID-19 pandemic, these live patient clinical examinations have been suspended throughout the country, preventing graduating students from earning licenses to enter the workforce and provide needed dental care in their communities. Several states accept alternative licensure pathways, such as postgraduate education, structured decision-making assessments or a portfolio, that do not rely on patients as test subjects. Forcing graduates to wait for patient-based examinations not only deprives qualified individuals of the ability to earn a living in their chosen profession, but also limits patients in their options for dental treatment.

Without suspension of or modification to clinical exam requirement rules imposed by the state boards of dentistry, the country could face a further shortage of oral health professionals when the COVID-19 pandemic has subsided. Each year, the licensure of graduating dentists and allied dental providers is necessary to maintain an adequate number of professionals who can provide care, as new dentists and allied dental professionals replace providers who retire. Furthermore, as most states have restricted dental treatment to emergency procedures only, it is likely that this policy, while necessary for preventing the spread of COVID-19, will create a backlog of patients needing treatment.

The Honorable Larry Hogan

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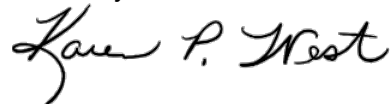
This backlog could potentially overwhelm dental offices and community-based dental clinics. Without modification to licensing rules, this will result in delayed care for individuals, the continuation of undiagnosed oral diseases, and pain for individuals suffering from tooth decay.

Licensure restrictions will also impact our armed forces, as many dental and allied dental graduates join the military and provide care to our troops. Without becoming licensed, recent graduates will not be able to serve patients in their military posts. This will result in delayed care for troops who need dental care.

ADEA applauds Gov. John Bel Edwards of Louisiana and Gov. Doug Ducey of Arizona for their leadership on this issue. We believe the policies they have created are examples of a way forward for other states. In Proclamation Number 38 JBE 2020, Gov. Edwards temporarily suspended the requirement that clinical licensing exams include procedures performed on human subjects. In Proclamation Number 41 JBE 2020, Gov. Edwards permitted the Louisiana State Board of Dentistry to issue licenses based on a 2020 graduation from a Louisiana-based, Commission on Dental Accreditation-accredited dental or allied dental program. In Arizona, Gov. Ducey issued Executive Order 20200-17, which requires the Arizona State Board of Dental Examiners, and other state boards that issue licenses, to issue provisional licenses to applicants who meet all requirements but are unable to take examinations due to testing center closures and unavailability of electronic or remote testing options. These are temporary measures that will not necessarily continue when the pandemic is over.

While the inability of graduating dental and allied dental students to obtain licensure in a timely manner has the potential to prevent them from joining the work force, the harm to patients and our health care system may be even greater. If governors do not act, it will exacerbate the shortage of oral health care providers. It is for these reasons that we urge all governors to suspend or modify state laws that prevent qualified dental and allied dental graduates from becoming licensed professionals.

Sincerely,

A handwritten signature in black ink that reads "Karen P. West". The signature is written in a cursive, flowing style.

Karen P. West, D.M.D., M.P.H.  
President and CEO