



*California Dental Hygienists' Association*  
*The Voice of Dental Hygiene*

## **AB 1952 (Berman) Program for International Dentists POSITION STATEMENT**

The **California Dental Hygienists' Association** (CDHA), must oppose AB 1952 unless amended. The bill requires the Dental Hygiene Board of California to provide an alternative pathway for internationally trained dentists to practice dental hygiene in California.

**Dentists from other countries come to California to practice dentistry – not dental hygiene.** Dental Hygiene programs, which can be completed within 18 - 24 months, are already a low barrier to entry for the few international dentists who do want to become Registered Dental Hygienists (RDHs). They become dental hygienists as a way to work in the oral health field while taking the required education to become licensed dentists.

**Dental hygiene education is not comparable to dental education and foreign dental education is not equivalent to California dental hygiene standards.** Dental Hygiene programs focus on public health, preventive and periodontal care, treatments, patient education and pharmacology. Dental Hygiene programs provide a completely different track than dental programs which provide doctoral level degrees focused on restorative care and treatments. Allowing foreign dental training to qualify for dental hygiene practice, without completing an approved dental hygiene education pathway, risks creating an uneven standard of preparation, which could directly impact the consistency and quality of care the public receives.

**Given the significant difference in the education and training between dental hygiene and dental programs, and the fact that foreign dental education does not align with California's dental hygiene curriculum and clinical competencies, it is unsuitable to require the Dental Hygiene Board of California to provide oversight of a dentist from another country.** That oversight lies with the Dental Board of California. Placing the burden of creating an expensive new program and oversight requirements on the Dental Hygiene Board of California, and passing those costs onto dental hygienists, to serve international dentists is unworkable and unjust.

**Dental Hygiene Staffing.** The number of dental hygiene programs and the number of Registered Dental Hygienists (RDHs) continue to grow. California produces over 800 RDHs annually. Many dental offices do not provide dental hygiene services, so they have no need to hire a dental hygienist. Often one dental hygienist works for multiple dentists in a dental

office. Dental offices that do not provide dental hygiene services are oral surgery, endodontics, orthodontics, and prosthodontics. The American Association of Pediatric Dentists (AAPD) reports the number of pediatric offices hiring dental hygienists has decreased, while the number of pediatric practices has increased. Twenty-two (22%) percent of the pediatric dentists in the west report they provide their own dental hygiene services. We understand the Department of Health Care Access and Information (HCAI) is doing a deep dive on dental hygiene workforce. They are gathering data to analyze and will provide findings. Any absolute conclusions on dental hygiene workforce in advance of HCAI's report is pre-mature. *(See also CDHA's workforce backgrounder attached.)*

**Creating more dental hygienists.** While there seem to be regional shortages of dental hygienists, the proponents state this bill would allow more international dentists to work as dental hygienists and help with staffing problems. **There is no certainty that dental offices that experience difficulty in attracting and retaining dental hygienists would gain a dental hygienist from creating an expensive new dental hygiene program for dentists.** Exorbitant costs of living in certain areas, negative office culture, part time work and no health benefits remain as barriers for dentists to attract and retain dental hygienists.

**Dentists are authorized to provide dental hygiene care under a dental license.** The dental practice act allows dentists to provide dental hygiene. Dentists are regulated by the Dental Board of California. The board is expert at what dental practice should be and what dental education programs must offer in order to comport with the highest standard of dental care.

**There is a solution.** The proponents are attempting to address two issues with this bill. Dental hygienist staffing and creating a new pathway for internationally trained dentists to work in California. Internationally trained dentists come to California with the objective of practicing dentistry. The solution is to **create a restricted dental license for internationally trained dentists while they work to become licensed dentists in California. A restricted dental license would allow dental hygiene duties, which are included in a dental license, along with limited restorative duties. The dentist operating under the restricted dental license would practice under the supervision of a licensed dentist, who would then receive dental hygiene support from the dentist working under the restricted license if desired. The Dental Board of California is the ideal regulator for a restricted dental license and a pathway for internationally trained dentists.**

It is for these reasons CDHA must respectfully **request you oppose AB 1952 unless amended.**

For questions regarding this measure and CDHA's proposed amendments Please contact our lobbyist, Jennifer Tannehill with Aaron Read & Associates, at (916) 448-3444. Thank you for considering CDHA's position.