



North Dakota State Board of Dental Examiners

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Senate Workforce Development Committee

March 21, 2025; 9:00 am

State Capitol; Fort Lincoln Room

Testimony of the North Dakota State Board of Dental Examiners

In Opposition to HB 1220

Chair Wobbema and members of the Senate Workforce Development Committee, my name is David Schaibley. I am the Executive Director of the North Dakota State Board of Dental Examiners here today providing the Board's testimony on HB 1220.

The Board appreciates the intent of the Bill and its sponsor's effort to make substantial and positive contributions to the workforce for some high need occupations. That is a laudable goal and one the Board supports. As a result, it was difficult for the Board to arrive at the decision of testifying in opposition. The Board feels obligated to do so, however, in order to effectively explain the ways HB 1220 may have far-reaching negative effects on our current dentists, hygienists, and assistants, and on our on future workforce. As a result, the Board opposes HB 1220 in its current form and seeks an amendment that would exclude it from the Bill.

The key provision that would negatively impact the dental workforce is the statement that the Board "shall approve a North Dakota accelerated degree and recognize the degree as accredited." (P1; L20).

I. Dentists and Hygienist

The mandate that the Board must recognize accelerated degrees as "accredited" would have a substantial negative impact on the dental field's North Dakota workforce and on our existing dental licensees. That is because without exception, all states require that all their schools of dentistry and schools of dental hygiene be accredited by the same entity—the Commission on Dental Accreditation

(CODA). There are many workforce-related benefits of having this universal standard of CODA-accreditation, including that:

- Students can be confident that their tuition payments are going toward the same quality of a degree regardless of the school that they attend anywhere in the country.
- Once the students graduate from a CODA-accredited program, they can take the National Exam and be licensed in any state.
- Once the students are licensed in a state, they can readily enter the workforce in that state.
- Once licensed and working in one state, dentists and hygienists can enjoy licensure mobility if they wish to obtain licenses in or move to other states.
- Dental offices can readily recruit and hire CODA program graduates regardless of the state the potential employee was educated in—knowing that the candidate will meet the educational components of licensure.

Unfortunately, House Bill 1220 would undercut each of those benefits. Examples of those impacts are:

- Students in accelerated programs would pay many thousands of dollars for degrees that no other state would recognize as accredited, so this non-CODA-accredited degree would be insufficient for licensure in those states.
- Every state requires that applicants for licensure take the dentist or hygienist National Exam. But graduates of these accelerated programs would not be allowed to take the National Exam. That is because only graduates from CODA-accredited programs are allowed to take the National Exams.
- Because these graduates would not be allowed to take the National Exam they would not be able to get a license—and thus could not work as dentists or hygienists—anywhere in the country. They could not even be

licensed or work as dentists or hygienists in North Dakota because the North Dakota Century Code also require passage of the National Exam—just like every other state.

- Changing our laws to add the accreditation of the accelerated degrees would mean North Dakota’s dentistry education requirements and laws are no longer substantially the same as all the other states. If North Dakota’s laws are no longer substantially the same as the other 49 states, our existing dentists and hygienists would no longer have the same licensure mobility they enjoy now. That is because generally, to have that mobility, the laws of the state the individual is leaving must be substantially similar to the laws of the state they are going to. And this Bill (mandating that we recognize something no other state recognizes) would mean North Dakota’s laws would no longer be substantially similar to the laws of any other state as to the educational criteria for dentists and hygienists.

II. Dental Assistants

Aside from dentists and hygienists, the Board also regulates dental assistants. HB 1220’s application to the dental assisting field is also problematic—but for a somewhat different reason. It is problematic for dental assisting because, different than the existing law, HB 1220 gives the Board no role for ensuring the content and quality of accelerated dental assisting programs meet our state’s criteria.

Under current North Dakota law, any entity anywhere in the country can create a dental assistant program. When they do, the Board works closely with them to ensure their curriculum and clinical training content produces competent dental assistants who can safely perform the duties that dental assistants are expected and allowed to perform in North Dakota. We do this with some regularity. In fact, we are working directly with Bismarck State College right now to do just that.

HB 1220 contains no role for “Board approval” of the accelerated degree programs. This lack of Board approval of the accelerated degrees would cause harm to students, dental offices, and the public, because without it:

- Students would lack an assurance that their accelerated degree would provide them with a quality education that prepares them to carry out all the tasks North Dakota law allows.
- Training programs would lack an assurance that their students will have paid for an education they can use for licensure and registration, and one that is worth its cost.
- Dental offices would lack an assurance that the dental assistants they hire from accelerated programs can actually perform the tasks expected of them, without causing harm to patients.
- Patients would lack an assurance that they are about to receive safe, quality care from their dental assistants.
- The Board would have a reduced ability for ensuring dental assisting applicants can safely practice.

III. Conclusion

HB 1220 might make substantial, positive, contributions to the workforce for some high need occupations, but it would have the opposite effect on dentistry—with negative consequences for dental professionals and North Dakota’s existing and future workforce. As a result, the Dental Board opposes HB 1220 in its present form and seeks an amendment that would exclude it from the Bill.

We appreciate your consideration and welcome any questions. Thank you.

Prepared and Presented by:

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