



State of Maine | 132nd Legislature
Joint Standing Committee on Health Coverage, Insurance and Financial Services

February 18, 2026

Neither for nor against:

LD 2199, An Act to Prohibit Interference with the Professional Judgment and Clinical Decisions of Licensed Health Care Professionals as Recommended by the Commission to Evaluate the Scope of Regulatory Review and Oversight over Health Care Transactions That Impact the Delivery of Health Care Services in the State

Senator Bailey, Representative Mathieson, and Members of the Committee:

My name is Gray McGinnis, and I serve as Vice President of Government Relations for the Association of Dental Support Organizations (ADSO). The ADSO is a national nonprofit representing Dental Support Organizations that provide non-clinical business support to dental practices so dentists can focus on patient care. ADSO members support more than **15,000 dentists, 8,500 practices**, and help facilitate approximately 30 million patient visits annually across 48 states. The ADSO represents Dental Support Organizations (DSOs) before the public, policymakers, and the media. In Maine, for example, Aspen Dental, Heartland and 42 North are all DSOs with, collectively, more than a dozen dental practice locations.

DSO's help dentists focus on the clinical care of their patients instead of having to devote a large percentage of their time to the procurement, legal, accounting, administrative and facility management elements of running a small business. The DSO model of dentistry is the fastest growing support model in the industry, especially among new and recent dental school graduates. DSO's do not provide clinical services. All clinical services are provided by, and under the direct supervision of licensed dentists.

ADSO is testifying **neither for nor against LD 2199** to provide important context regarding how this proposal intersects with dental practice in Maine.

Under the Maine Dental Practice Act and long-standing professional regulation by the Maine Board of Dental Practice, only licensed dentists or independent practice dental hygienists may independently practice dentistry and exercise clinical judgment. This statutory framework, together with Maine's recognition of the Corporate Practice of Dentistry (CPD) doctrine, ensures that non-dentists cannot direct, control, or interfere with the diagnosis, treatment planning, or clinical decisions of licensed dentists.

In practical terms, this means that clinical decisions in dental practices are — and must remain — the sole responsibility of licensed providers exercising independent professional judgment. Any arrangement that allows non-providers to control clinical care would risk constituting the unlicensed practice of dentistry.

Dental Support Organizations operate within this framework by providing **non-clinical administrative services only**, such as human resources, compliance support, procurement, information technology, and facility management. DSOs do not provide dental care, do not practice dentistry, and do not direct treatment decisions. These arrangements are intentionally structured to preserve dentists' full authority over all clinical matters, consistent with the Maine Dental Practice Act and CPD principles.

LD 2199 would prohibit interference with the professional judgment or clinical decisions of licensed health care professionals with independent practice authority. ADSO strongly supports protecting clinicians' autonomy. However, as applied to dentistry, the bill would largely be **redundant of existing law and regulation**, which already safeguard the independent clinical judgment of licensed dentists.

We are concerned that the bill's broad language could unintentionally create confusion regarding lawful dental practice arrangements that currently comply with Maine law. Without clarification, the bill could be interpreted to suggest that clinical decision-making in dentistry is presently being controlled by non-clinicians, which is not the case under the Maine Dental Practice Act and CPD doctrine.

For that reason, ADSO respectfully recommends that the Committee consider an amendment to **explicitly exempt dental practices or clarify that the bill does not alter the existing statutory and regulatory framework governing dentistry**. Such clarification would avoid unintended consequences while preserving the bill's intent.

ADSO stands ready to work with the Committee on clarifying language that accomplishes the bill's objectives without creating uncertainty for dental providers or patients.

Thank you for your time and consideration.

Sincerely,



Gray McGinnis

VP of Government Relations

The Association of Dental Support Organizations