



## **Testimony Regarding LD 2206 - An Act Expanding Access to Oral Health Care by Creating a New Path for Obtaining a License to Practice Dentistry**

**132nd Maine Legislature – Second Regular Session (2026)  
Maine Academy of General Dentistry (ME AGD)**

**Dear Respected Representatives of the Committee on Health Coverage, Insurance and Financial Services,**

The Maine Academy of General Dentistry is an organization representing over 100 general dentists and specialists across the state of Maine. We encourage this committee not to pass Bill 2206 as written.

The Maine Academy of General Dentistry supports expanding access to oral health care. Workforce shortages in certain regions of Maine are real, and thoughtful solutions are needed. However, LD 2206 proposes one of the most significant structural changes to dental licensure in modern history. In practical terms, it would create an entirely new pathway to practice dentistry in Maine without completion of a CODA-accredited U.S. dental program. That represents a potential shift of a magnitude not seen since dentistry first became formally regulated in this country.

We are not opposed to innovation. We are concerned about haste.

Before implementing such a foundational change, we respectfully urge the Legislature to pause and convene a task force comprised of stakeholders, including the Maine Board of Dental Practice, the Maine Academy of General Dentistry (ME AGD), the Maine Dental Association (MDA), dental educators, public health representatives, rural health advocates, and internationally trained dentists. The ME AGD would be honored to serve in this role.

Several critical questions require careful examination:

- Does this proposal effectively replace or circumvent the longstanding requirement that internationally trained dentists complete two years of advanced***

***standing education at an accredited U.S. dental school prior to independent practice?***

- ***How will equivalency of education and clinical competency be determined across countries with widely variable training standards?***
- ***What objective criteria will determine which procedures an Associate Dentist may perform, and how will quality be measured under “general supervision”?***
- ***How will general supervision ensure that standards of care equivalent to U.S.-trained dentists are maintained?***
- ***Is there a language proficiency requirement to ensure patient safety, informed consent, and medical accuracy?***
- ***Are there geographic restrictions to ensure this pathway addresses underserved areas rather than contributing to saturation in already competitive markets?***
- ***What safeguards will prevent labor exploitation or downward pressure on associate compensation if internationally trained dentists can be employed at lower wages?***
- ***What contractual protections will be required?***
- ***Have other states successfully implemented a comparable model, and what have been the outcomes?***

This legislation has the potential to reshape the professional landscape of dentistry in Maine, and beyond. On the surface, this bill may offer benefits, but it also carries risks to patient safety, workforce stability, and regulatory oversight. We note that the oversight capacity and bandwidth of the Board of Dental Practice must also be realistically assessed if a new licensure category is added.

Access to care must be expanded in the right way. Incentives for rural practice, tax strategies, reimbursement reform, and workforce pipeline development remain viable approaches that warrant continued attention.

It is also relevant to note that other states are exploring alternative approaches to address workforce shortages, including creating pathways for internationally trained dentists to obtain dental hygiene licensure on an accelerated basis. Given that Maine is experiencing a significant hygiene shortage, this avenue may warrant serious consideration as a more targeted and potentially less disruptive solution to access challenges.

LD 2206 deserves a deliberate, transparent, and data-driven review. We respectfully request that the Legislature slow the process and authorize a formal task force to evaluate this proposal comprehensively before enacting such a transformative change.

Maine's patients deserve thoughtful consideration, not rushed reform.

For these reasons, we respectfully urge the Committee not to advance LD 2206 in its current form and instead allow for further study and stakeholder engagement before proceeding.

**Respectfully submitted,**  
**Maine Academy of General Dentistry**