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September 18, 2020

Attention: Policy Analyst  
Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing – Boards and Committees Section  
P.O. Box 30670  
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To Whom It May Concern:

The Pew Charitable Trusts (Pew) appreciates the opportunity to provide comments on Rule Set 2020-27 LR, Administrative Rules for Dentistry - General Rules (Rules). Pew applies a rigorous, analytical approach to improve public policy, inform the public, and stimulate civic life. Through our Dental Campaign, we promote evidence-based, cost-effective policies to ensure people get the dental care they need to lead healthy lives. We write in strong support of the Rules as currently written.

Michigan's Public Act 463 of 2018 (Legislation) authorized the licensure and practice of dental therapy. By implementing that Legislation, the Rules would enable trained professionals to be licensed in the state of Michigan as dental therapists—midlevel providers who can work in traditional dental offices and clinics or in community settings, such as schools or nursing homes, to provide safe and cost-effective preventive and routine restorative care. Dental therapists earn lower salaries than dentists, so incorporating them into the team can help dentists provide more cost-effective care. The savings from the lower costs of employing dental therapists make it cost-effective for both public and private dental practices to expand capacity and increase access to publicly insured and other underserved patients.

Currently, 1.6 million Michigan residents live in areas with dentist shortages.<sup>i</sup> Limited access to oral health care impacts some of Michigan's most vulnerable residents, including communities of color, pregnant women, rural residents, and low-income children.<sup>ii</sup> In fact, 56% of the state's children who were on Medicaid—almost 618,000 kids and adolescents—did not see a dentist in 2018.<sup>iii</sup> By implementing the Legislation, which requires dental therapists to work in underserved areas, the Rules would help close Michigan's wide access gap.

Studies from Minnesota, where dental therapists have practiced since 2011, demonstrate that these providers enable clinics and dental offices to expand access to publicly insured and other traditionally underserved populations in a cost-effective way.<sup>iv</sup> The year it hired one dental therapist, a private practice in rural Minnesota served 200 more Medicaid patients than it had the previous year.<sup>v</sup> A federally qualified health center in Minnesota found that after one year of employment, the estimated Medicaid revenue generated by a dental therapist exceeded the cost of her employment by more than \$30,000.<sup>vi</sup>



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We applaud the work of the Department of Licensing and Regulatory Affairs and urge the Department to finalize the Rules as currently drafted. Thank you for the opportunity to express our strong support.

Sincerely,

Kristen Mizzi Angelone  
Pew Dental Campaign

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<sup>i</sup> U.S. Department of Health & Human Services, Health Resources and Services Administration (HRSA), Bureau of Health Workforce, Designated Health Professional Shortage Areas Statistics: Third Quarter of Fiscal Year 2020 Designated HPSA Quarterly Summary, as of June 30, 2020. Accessed Aug. 31, 2020 at <https://data.hrsa.gov/topics/health-workforce/shortage-areas>.

<sup>ii</sup> Michigan Department of Health & Human Services and the Michigan Oral Health Coalition, 2020 State of Oral Health Plan, accessed Aug. 31, 2020 at [https://www.michigan.gov/documents/mdhhs/2020\\_MichiganStateOralHealthPlan\\_FINAL\\_511929\\_7.pdf](https://www.michigan.gov/documents/mdhhs/2020_MichiganStateOralHealthPlan_FINAL_511929_7.pdf).

<sup>iii</sup> This figure counts children ages 1 to 20 who were eligible for the Early and Periodic Screening, Diagnostic and Treatment Benefit for 90 continuous days and received any dental service. See U.S. Department of Health and Human Services, Centers for Medicare and Medicaid Services, Annual EPSDT Participation Report, Form CMS-416 (Michigan) Fiscal Year: 2018, <https://www.medicaid.gov/medicaid/benefits/epsdt/index.html>.

<sup>iv</sup> Minnesota Department of Health and Minnesota Board of Dentistry, "Early Impacts of Dental Therapists in Minnesota," [https://mn.gov/boards/assets/2014DentalTherapistReport\\_tcm21-45970\\_tcm21-313376.pdf](https://mn.gov/boards/assets/2014DentalTherapistReport_tcm21-45970_tcm21-313376.pdf).

<sup>v</sup> The Pew Charitable Trusts, "Expanding the Dental Team: Studies of Two Private Practices," 2014, [https://www.pewtrusts.org/-/media/legacy/uploadedfiles/pcs\\_assets/2014/expandingdentalteamreportpdf.pdf](https://www.pewtrusts.org/-/media/legacy/uploadedfiles/pcs_assets/2014/expandingdentalteamreportpdf.pdf).

<sup>vi</sup> The Pew Charitable Trusts, "Expanding the Dental Team: Increasing Access to Care in Public Settings," 2014, [https://www.pewtrusts.org/-/media/assets/2014/06/27/expanding\\_dental\\_case\\_studies\\_report.pdf](https://www.pewtrusts.org/-/media/assets/2014/06/27/expanding_dental_case_studies_report.pdf).