

Memo To: VSDS Member Dentists
From: VSDS Executive Board
Date: January 5, 2009

RE: Dentist Licensure Proposal to the Vermont Board of Dental Examiners:

The Executive Board of the Vermont State Dental Society is strongly urging the Vermont Board of Dental Examiners to consider modifications to the rules for obtaining a license to practice dentistry in Vermont.

The majority of dentists that settle in Vermont to practice are from other regions of the United States. The dental society has had recent inquiries from out of state dentists and dental practice transition companies that indicate that the Vermont criteria for licensure creates additional barriers on dentists holding licenses in other states. This is evident in two ways: 1) the doctor is impeded by having to take a redundant written examination that has previously been completed in another regional board examination or 2) the doctor may have qualified for licensure by completion of an accredited dental residency program that includes measured competency based assessments.

Based on these inquiries and our interest in a sufficient and competent dentist workforce, during the past year the VSDS Executive Board has carefully considered the licensing requirements of other states and sought input from member dentists. In September 2008 we notified our members that we would like to hear their comments on Vermont dentist licensure criteria. At our November 14, 2008 meeting we held an open forum to hear from our members. The comments were varied and were both opposed to and supportive of proposed changes. Some of the comments related to the capability of different examinations or completion of postgraduate dental programs to identify competent practitioners.

Based on our evaluation of the requirements in other states, member input and consideration by the VSDS Executive Board Members, we have asked the BDE for careful consideration of our proposed changes so that qualified and competent dentists from other regions of the United States may have improved licensure mobility to practice in Vermont.

In addition to the above criteria, we propose modifications to Vermont dentist licensure criteria as listed below.

Consistent with the current rules of the Board, we believe that all applicants for licensure as a dentist in the state of Vermont must:

- a) Have successfully completed the curriculum of a CODA accredited dental program
- b) Have successfully completed parts I and II of the U.S. National Boards and
- c) Have successfully completed a regional clinical examination
- d) Be current in "emergency training"
- e) Have successfully completed the Vermont Rules and Statute examination

Currently, the Vermont Board of Dental Examiners recognizes all of the regional examinations as acceptable if the NERB/ADEX computer simulation examination is also completed. The VSDS executive board believes that passage of any US regional board should be a sufficient test of competency and that the additional requirement for completion of the NERB/ADEX computer simulation examination is redundant.

This requirement is redundant since the WREB, CRDTS and SRTA examinations have similar computer simulation components and grading methodologies. To support this fact, the ADA recently released the findings of a three-year study of regional examination equivalency conducted by the ad hoc committee on licensure. There were representatives from the ADEX/NERB, SRTA, WREB and CRDTS regional boards on this committee to study equivalency. It is the ADA's committee findings that all of the regional examinations studied are equivalent. The only examination that was not studied is the relatively new CITA exam.

Also, the VSIDS Executive Board believes that both post graduate education and regional testing examinations have advantages and disadvantages as predictors and, in essence, we are proposing either method as adequate for the protection of the public.

Therefore, in addition to the above a-e requirements listed on the previous page, the VSIDS Executive Board is recommending that the use of the following criteria would be positive steps in licensing qualified dentists in the state of Vermont:

1. Acceptance of successful completion of the following regional Boards: NERB/ADEX, CRDTS, WREB, SRTA, and CITA (the additional requirement of completion of the NERB/ADEX written Examination would be required for CITA since they currently do not have a written examination) *or* Other individual state examinations, regional examinations, U.S. national clinical examinations or the Canadian Objective Structured Clinical Examination (OSCE) should be accepted with BDE approval prior to examination
OR
2. Successful completion of a CODA Accredited GPR or AEGD (PGY 1) program with certification by the program director of completion of "core competency assessments" as adopted by the BDE. (The "core competency assessments" could be similar to those used in the states of Connecticut, California or New York.)
OR
3. Successful Completion of a CODA Accredited ADA recognized dental specialty program of one or more years in length.

We are requesting that the Vermont Board of Dental Examiners take prompt action to consider these alternative licensure criteria and we are anxious to participate in this rule making process.

Please contact Drs. David Averill and Jeffery Berkowitz who have been assigned to represent the VSIDS Executive Board on the issues related to dentist licensure. (http://vsids.org/mem_leadership/index.aspx)