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April 2, 2026

The Honorable Melissa A. Murray, Chair
Senate Committee on Health and Human Services
State House
82 Smith St.
Providence, RI 02903

RE: S 2862 – An Act Relating to Businesses and Professions – Dentists and Dental Hygienists

Dear Chair Murray:

Please accept this letter with minor amendments regarding S 2862, legislation that would allow foreign-trained dentists and dental hygienists to obtain limited licenses if they graduate from reputable dental colleges or universities, work under a supervising dentist, and pass a board-approved exam.

Rhode Island does not have a dental school, and there is a shortage of dentists in Rhode Island. This legislation is similar to an initiative that has been operational in Massachusetts since 2014. Due to the implementation of the legislation in Massachusetts, the state currently has more than 200 foreign-trained dentists working in 23 health centers. Before this legislation was enacted in 2014, Massachusetts had none. Rhode Island's dentist-to-population ratio is the lowest of the New England states (See Figure 1). There are significant disparities in rates of dental visits for adults in Rhode Island based on race and ethnicity (See Figure 2). In addition, high rates of persons of color have emergency room visits for dental conditions (See Figure 3). Rhode Island needs to seek alternative ways to decrease dental provider shortages, and this legislation can help close the gaps.

The Rhode Island Department of Health (RIDOH) proposes the following amendments:

- Page 2, line 16/17. Remove the words *or by the board* so the sentence reads: *Limited registration under this section may be revoked at any time by the director of the department of health ~~or by the board~~.*
- Page 3, line 11/12 Remove the words *board and/or director* and replace with the word *department* so the sentence reads (g) *The department ~~board and/or the director~~ shall promulgate any rules and regulations that the board or the director deems necessary to implement the provisions of this section.*
- Page 3, line 13. The legislation should become effective upon promulgation of regulations and, therefore, the sentence should read *SECTION 2. This act shall take effect upon ~~passage~~ promulgation of regulations.*

Implementing this legislation would also require changes to licensure applications and the licensing database, updates to regulations, and additional education to the public and the board about how the process will work. This will be a strain on our already small staffing resources. RIDOH has only one part-time contractor to oversee the dental board, and the board manager

assigned also has more than 8 other boards to oversee. RIDOH would need an additional Grade 29 FTE to serve as a full-time board manager at an estimated annual cost of \$144,094, with expected increases in salary and benefits in future years.

Thank you for the opportunity to comment on this legislation.

Sincerely,



Jerome M. Larkin, MD
Director

CC: The Honorable Members of the Senate Committee on Health and Human Services
The Honorable Lammis J. Vargas
Kristen Silvia, Director of Legislation and Deputy Chief of Staff
Patricia Resende, Director of Policy

Figure 1: From American Dental Association Health Policy Institute
<https://www.ada.org/resources/research/health-policy-institute/dentist-workforce>

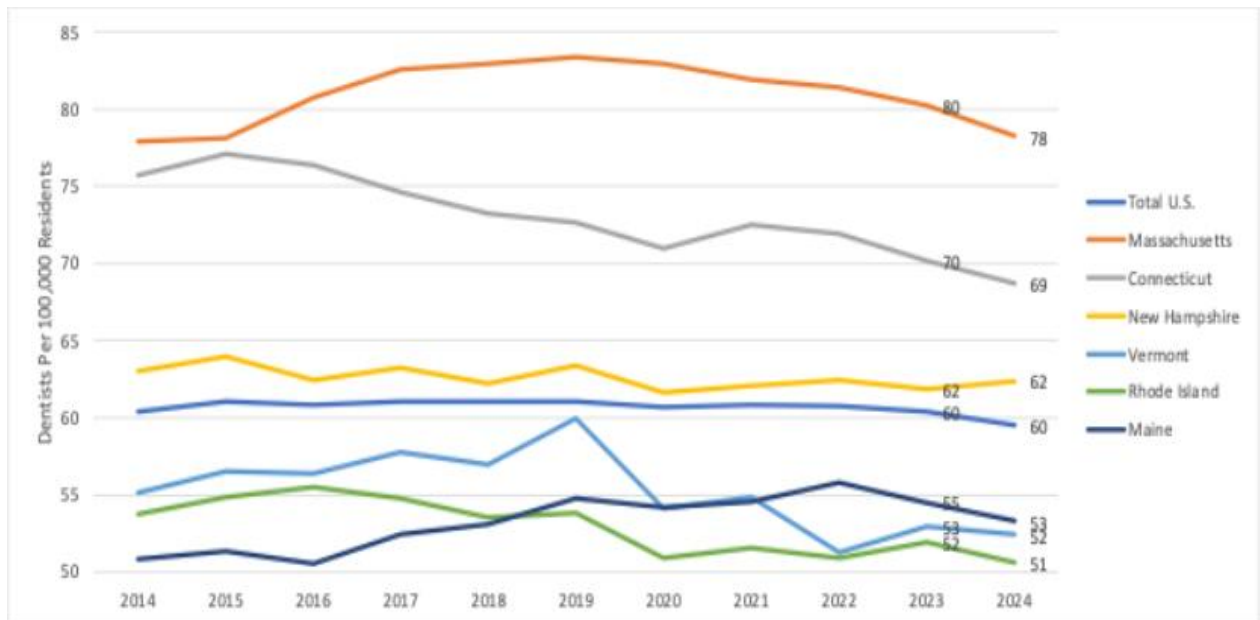


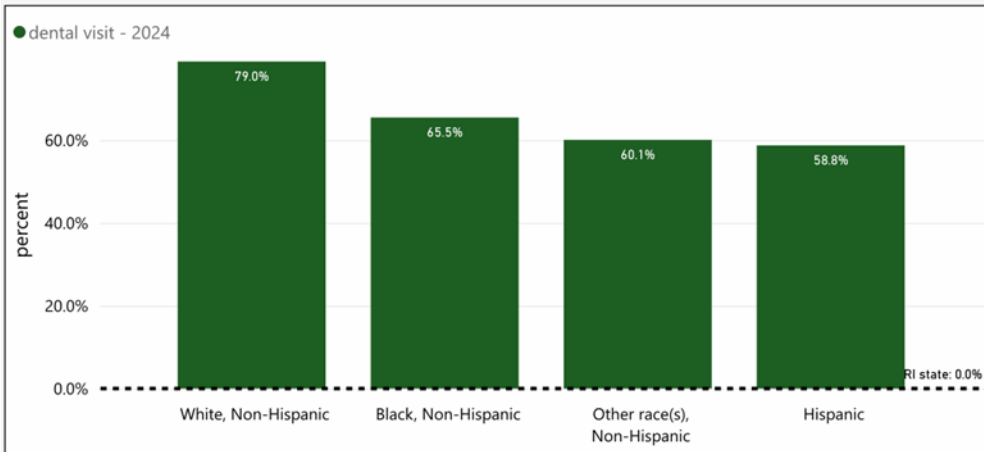
Figure 2: Rhode Island Behavioral Risk Factor Surveillance Survey 2024.
<https://rhode-island-brfss-rihealth.hub.arcgis.com>

Dental Visits among Rhode Island adults
by: Race/Ethnicity

Select year

2024

Source: Rhode Island Behavioral Risk Factor Surveillance System



Dental visits = visited a dentist or dental hygienist for any reason in past year

Figure 3: Data Source: Rhode Island Hospital Discharge Data, 2024.
<https://health.ri.gov/data/hospital-discharge-data>

