Testimony for HB 4865 (Draft 1)

Peter MacGregor, Chairwoman Haines and Committee Members:

I am Debbie Bassett, Oral Health Team Supervisor for the Ottawa County Health Department, Oral Health Program. I am writing on behalf of my department to share our opposition to House Bill 4865. For 19 years our department has operated mobile dental services with the goal of improving the oral health of children in Ottawa County by increasing accessibility to dental care. This Bill would limit our ability to efficiently operate this best practice model.

Our Department operates two mobile dental initiatives: 1) Seal! Michigan sealant program which is supported by MDCH grant funding and 2) Miles of Smiles-mobile dental initiative which has been financially supported with federal, state and local resources. This program has been operational for almost 20 years and is enthusiastically supported by the West Michigan dental community. Miles of Smiles is partially staffed by over 40 volunteer dentists, who so generously volunteer their time by providing restorative dentistry on our mobile unit at area schools. Miles of Smiles has received the "Steel Water Award" from the West Michigan District Dental Society in 2010 for "outstanding contributions to the West Michigan Dental Community".

Miles of Smiles is a community partnership involving schools, state and local government, nonprofit agencies, the local dental community and others who have assured access for children ages 0-18. Our program has exceeded 30,000 client appointments where children have received comprehensive dental care including preventative and restorative treatment.

The Ottawa County Health Department dental program has been awarded funding that totals over $1,000,000 from MDCH, Delta Dental, local foundations, & private funders. Miles of Smiles is a model that operates just as a dental office but has addressed the social determinates of health with regard to: transportation; access to care; and language and cultural barriers.

Our department opposes the bill as it is currently written. We understand the rationale behind the HB 4865: because of dental programs that may not have provided dental care in the best interest of the children/patients. However, if this bill were to pass as written, ethical, best practice programs like ours would be forced to adhere to another layer of regulatory oversight that is redundant and unnecessary.

Please see the list of concerns with HB 4865: Draft 1

1. There should not be two sets of standards; one for mobile dentistry and one for traditional dentistry. The standards that are upheld on the behalf of the patient should be expected in both traditional settings and mobile dental facilities. The venue for which they choose to practice should not play a role in determining new regulation. E.g. annual reports, permits etc. This adds a layer of redundancy and over regulation. Dentists and hygienists already are regulated under their State of Michigan Professional license. If a dental professional is not operating appropriately within the scope of their license, there are already measures in place for corrective action.
2. Page 3- line 14: We have not been informed as to how much this permit will cost. Providing care to the low income, uninsured and underinsured is already financially difficult; adding regulation, permitting and fees adds unnecessary costs to both state and local government.
3. Page 5 Line 15- This bill does not take into consideration the use of volunteers. We have over 100 volunteers that provide direct patient care on our mobile unit. We have approximately 40 dentists, 30 dental hygienists and 30 Grand Rapids Community College students; many of which change annually.
4. Page 5 line 22 –This statement does not take into consideration that we provide comprehensive care and have both a contract dentist and volunteer dentists that provide both preventative and restorative treatment to our patients. There is no MOA needed as we provide the follow up care to our patients.
5. Page 6 line 27-- because we utilize many volunteers, it would be extremely difficult to obtain an actual copy of their license, however we verify licensure from the Licensing and Regulatory affairs (LARA) site.
6. Page 8 line 15 – A written treatment plan would not be possible for two reasons: 1) HIPAA compliance: We are generally at schools and see children that do not have their parents with them. Distributing the written treatment plan to a child to carry around and possibly lose until they get back to their classroom would not be advisable; 2) Many times these programs do not have a dentist on site. A hygienist cannot diagnose therefore it would not be possible for a written treatment plan to be completed.
7. Page 9 Line 26 – This statement assumes that the mobile dental facility is not the dental home. With Miles of Smiles, we are the dental home.
8. Page 10 Line 4- Because we provide comprehensive care to our patients, most times we are the patient's dental home. I would not want to put this statement on our forms. There is not a reason to have the dentists' name and address on our consent form, not to mention most parents will not even know the dentists' name and address.
9. Page 10 Line 21- Procedure code, fee and tooth numbers are not necessary due to HIPAA regulations and no fees are charged to the

patient/parent. All our services are free.

10. **Page 12 Line 1-6** – Our program is successful because of the volunteers. We have over 100 volunteer dentists, volunteer hygienists and Grand Rapids Community College dental hygiene students. The reporting that is required is labor intensive and cost prohibitive. It also states changes in dentists; dental hygienists must be reported etc. For us, this continuously is changing and would be very difficult and cost prohibitive to supply this information.

Our program provides full comprehensive care to children and has had the support of the dental community for almost 20 years. In most cases, Miles of Smiles is the child's DENTAL HOME. This bill would be detrimental to both of our dental programs; Seal! Michigan and Miles of Smiles.

Very Concerned,

Debra Bassett, R.D.H., B.H.S.
Oral Health Team Supervisor
Ottawa County Department of Public Health
12251 James St. , Suite 400
Holland, MI 49424
(616) 494-5540
Fax (616) 393-5643
dbassett@miottawa.org

miOttawa Department of
Public Health