

To: Senate Health and Human Services Committee Members

From: American Dental Hygienists' Association

Date: May 28, 2025

Re: Opposition to Sections 77-79 of SB 495

The American Dental Hygienists' Association (ADHA), together with the Nevada Dental Hygienists' Association (NV DHA), submits this testimony in formal opposition to Sections 77–79 of Senate Bill 495 and respectfully requests that these sections be removed from the final version of the bill.

ADHA represents the interests of more than 200,000 dental hygienists across the United States. For over a century, our association has served the public by supporting the delivery of preventive and therapeutic oral health care. As the largest national organization representing dental hygienists, we are deeply concerned by harmful provisions included in SB 495 intended to address workforce challenges in Nevada.

Sections 77–79 direct the Nevada Board of Dental Examiners to create an alternative training pathway for dental hygiene licensure. Instead of requiring graduation from a Commission on Dental Accreditation (CODA)-accredited dental hygiene program, these provisions would allow individuals to complete a course of training under the supervision of a licensed dentist—essentially, on-the-job training. This shortcut to licensure bypasses critical education and national standards, putting both the public and the profession at risk.

ADHA is committed to being part of the solution to workforce shortages and has long supported efforts to strengthen the dental hygiene and broader oral health workforce. However, we strongly oppose any proposal that compromises patient safety, weakens licensure standards, or undermines the integrity of the dental hygiene profession.

Currently, dental hygienists complete a minimum of three years of college-level education, including nearly 3,000 hours of didactic and clinical training. Many hygienists also go on to earn baccalaureate or master's level degrees to pursue licensure as dental therapists, expanding access to care in underserved and rural areas. This level of education is not optional—it is essential to delivering safe, competent, and ethical care.

Proponents of SB 495 may claim that this alternative pathway would be limited to periods of documented workforce shortage within a given two-year licensure period. However, Nevada consistently reports shortages, which means this “exception” could quickly become the norm—setting a dangerous precedent.

Moreover, SB 495 fails to meet established CODA standards, which require that all dental hygiene education programs be sponsored by institutions of higher education recognized by the U.S. Department

of Education. Bypassing this requirement opens the door to substandard training and erodes public trust in oral health providers.

ADHA strongly abides by the following policies:

- Recognize dental hygienists as primary oral healthcare providers with the authority to practice autonomously within their full scope of education and licensure.
- Ensure that all providers of dental hygiene care meet rigorous educational standards established by accredited institutions to maintain excellence in person-centered care.
- Support licensure systems that uphold competency-based qualifications to protect patient safety and advance best practices in oral healthcare.
- Oppose the provision of dental hygiene services by unqualified or inadequately trained individuals, as this compromises patient outcomes, public health, professional integrity, and trust.

To safeguard public health, uphold the quality of care, and maintain professional accountability, it is imperative that only individuals who have met established educational, clinical, and licensure requirements be permitted to provide dental hygiene services.

For these reasons, we strongly oppose Sections 77–79 of SB 495 and respectfully urge the Committee to strike these provisions in their entirety.