



The American Academy of Oral Medicine
INTEGRATING MEDICINE AND DENTISTRY

May 31st, 2025

AAOM

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One Glenlake Parkway
Suite 1200
Atlanta, GA 30328
info@aaom.com
571-297-4003

To

Senate Health and Human Services Committee

Nevada State Legislature

Email: senhhs@sen.state.nv.us

RE: Concerns Regarding Sections 77–79 of Senate Bill 495 – Importance of Maintaining Rigorous Licensure Pathways for Dental Hygienists

Dear Chair and Members of the Senate Health and Human Services Committee,

On behalf of the American Academy of Oral Medicine (AAOM), I am writing to express our strong support for efforts to improve access to oral health care across Nevada, including the intent behind Senate Bill 495 to address workforce shortages. However, we respectfully submit the following concerns regarding **Sections 77–79** of the bill, which would permit **on-the-job training** as a pathway to dental hygiene licensure.

AAOM supports innovative, sustainable solutions to expand the dental workforce. That said, it is essential that such solutions maintain the **rigor, safety, and portability** of professional licensure, particularly for providers who play a vital role in disease prevention and early detection, including oral cancer screening, systemic health monitoring, and therapeutic care.

Key Considerations:

1. Patient Safety and Public Trust

Dental hygienists deliver clinical care that intersects systemic health and disease prevention. Without comprehensive training in areas such as pharmacology, pathology, and infection control, patient care may be compromised, especially among medically complex or vulnerable populations. Licensure based solely on on-the-job training may not adequately prepare individuals for these responsibilities

2. Educational and Professional Standards

Accredited education and national board examination requirements ensure consistency in knowledge, competence, and accountability across states. A non-CODA-accredited training pathway, as proposed in SB 495, would create a limited scope, potentially restricting professional mobility and creating long-term workforce segmentation.



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3. **Unintended Consequences**

Lowering entry thresholds for dental hygiene licensure could unintentionally devalue the profession, discourage enrollment in accredited programs, and create long-term challenges in recruiting and retaining qualified providers. Perhaps most critically, insufficiently trained providers increase the risk of clinical errors, patient harm, and compromised care standards, especially for individuals with complex medical needs. These risks carry significant malpractice liability for providers and legal exposure for employers, potentially undermining public trust and increasing the cost of care.

4. **Collaborative Alternatives**

AAOM encourages Nevada to explore workforce solutions that expand access while preserving licensure integrity, such as increasing support for accredited dental and dental hygiene education pathways, particularly those targeted toward underserved areas. These approaches have demonstrated success in strengthening the workforce without compromising educational standards or patient safety.

We respectfully recommend that the Committee revisit Sections 77–79 of SB 495 with input from a broad coalition of oral health stakeholders. We believe Nevada can and should lead in solving dental workforce challenges without compromising the professional standards that protect patients and communities.

Thank you for your attention to this important matter and your continued commitment to accessible, high-quality health care in Nevada.

Sincerely,

A handwritten signature in black ink, reading 'Jaisri R. Thoppay'.

Jaisri R. Thoppay
President,
American Academy of Oral Medicine