

January 6, 2026

Subject: Proposed Dental Hygiene Licensure Requirements for Foreign Trained Dentists

Dear Members of the Board of Registration in Dentistry,

Thank you for the work you are doing to implement the Foreign Trained Dentists provision of MGL c.112 §51. As you know, this law was enacted to help address the significant hygienist workforce shortage while maintaining appropriate safeguards to protect the public.

It is our understanding, based on the BORID Subcommittee's public meeting on December 17, 2025, that the Subcommittee intends to recommend requiring that the five years of lawful foreign dental practice occur within the ten years preceding application. We respectfully urge the Board not to adopt this additional restriction.

The statute is clear that an applicant who has obtained not less than five years of lawful practice in a foreign country or province and meets the competency and examination requirements shall be registered. While the Massachusetts Dental Society respects the Board's authority to adopt rules and regulations related to the practice of dentistry, adding a ten-year recency requirement would redefine the statutory criteria established by the Legislature and create a new substantive eligibility requirement not contained in the statute. Such a change would go beyond implementing the law as written and would effectively exclude otherwise qualified applicants the Legislature intended to include.

The Massachusetts Dental Society shares the Board's obligation to protect the public. We believe the Board can fulfill this responsibility through its core functions of examining and evaluating applicants for competency, rather than by limiting who may apply for licensure in the first instance. The existing examination, credentialing review, continuing education requirements, and documentation from the applicant's country of origin are the appropriate mechanisms to ensure competency, rather than restricting who may apply for licensure. If the Board has concerns about a lapse in recent practice, those concerns could be addressed through additional continuing education or hands-on training requirements, rather than a categorical exclusion based on the recency requirement. Furthermore, this restriction may significantly decrease the pool of candidates and not effectively improve the workforce shortage challenge as intended by the Legislature.

For these reasons, we respectfully request that the Board refrain from adopting a ten-year recency requirement or any regulation that would interfere with the statute's mandatory language.

We would welcome the opportunity to discuss this further if helpful.

Respectfully submitted on behalf of the Massachusetts Dental Society,

Steven D. Spitz, DMD
President,
Massachusetts Dental Society