



March 11, 2024

The Honorable Frank Burns  
Majority Chair  
House Professional Licensure Committee  
332 Main Capitol Building  
P.O. Box 202072  
Harrisburg, PA 17120

The Honorable Carl Metzgar  
Republican Chair  
House Professional Licensure Committee  
216 Ryan Office Building  
P.O. Box 202069  
Harrisburg, PA 17120

Dear Chairman Burns and Chairman Metzgar:

I am writing on behalf of the Pennsylvania Coalition for Oral Health (PCOH), a statewide nonprofit coalition that works to improve the oral health and overall health of all Pennsylvanians. Thank you for the opportunity to submit comments for the House Professional Licensure Committee hearing on HB 1364 addressing advisory opinions from state licensing boards.

PCOH works with over one thousand individual and organizational stakeholders representing vulnerable and at-risk populations, dental and medical professionals, and other advocates to support the development and retention of a competent oral health workforce. The initiative to allow state licensing boards to offer non-binding advisory opinions as outlined in HB 1364, supports our workforce while protecting the public by permitting a state board to clarify regulations, mitigate potential violations, and promote consistency.

Concise and unambiguous regulations are critical in all professions. However, the interpretation of these regulations can often be complex and may vary between perspectives. Unlike some other states or professions, the Pennsylvania dental law does not include a jurisprudence exam as a requirement for licensure to ensure that applicants have a clear understanding of the laws and regulations as they relate to the practice of dentistry, nor are they able to receive guidance from the state board regarding clarification or interpretation of current regulations. By providing non-binding advisory opinions, state licensing boards would be able to support providers ensuring a clear and consistent understanding of regulatory requirements while also mitigating potentially inadvertent violations.

A transparent regulatory environment that includes the option to support providers through advisory opinions is a proactive approach that elevates the standard of practice while promoting continuous learning and improvement for professionals. When providers can enhance their practices the public benefits. Likewise, when a provider has a potentially avoidable violation, the public suffers. The implementation of non-binding advisory opinions protects public interest by minimizing the risks associated with regulatory ambiguity or misinterpretation. Timely guidance and clarification from state licensing boards can help prevent potential harm to consumers and uphold the trust held in licensed professionals. In doing so, state licensing boards safeguard the public while supporting the integrity of the profession.

I wholeheartedly ask for your support to endorse HB 1364. Permitting state licensing boards to offer timely non-binding advisory guidance benefits professionals and regulatory authorities while contributing to the broader goal of ensuring the public can rely on a competent workforce.

Sincerely,

A handwritten signature in blue ink that reads "Helen Hawkey". The signature is written in a cursive, flowing style.

Helen Hawkey, Executive Director, PA Coalition for Oral Health

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*Working to improve oral health for all Pennsylvanians by uniting stakeholders to advance advocacy, policy, education and innovative approaches.*