

May 24, 2023

Members of the Senate Health Committee

Wisconsin Dental Association

Re: Senate Bill 143 relating to the use of certain words and terms that refer to a physician

Chairwoman Cabral-Guevara and members of the committee thank you for the opportunity to offer comment on Senate Bill 143 relating to use of certain words and terms that refer to a physician.

The Wisconsin Dental Association, with more than 3,100 member dentists, is the leading voice for dentistry in Wisconsin. WDA members are committed to promoting professional excellence and quality oral health care in the Badger State. The WDA appreciates the conversations we've had with Senator Cabral-Guevara and the bill sponsors to clarify that Senate Bill 143 is not intended to include the practice of dentistry and, if necessary, will seek an amendment to ensure Senate Bill 143 does not create unintended consequences for our member dentists.

All dentists graduate from an accredited dental school and receive one of two degrees – a DDS (Doctor of Dental Surgery) or a DMD (Doctor of Dental Medicine). Dentists work in a variety of settings and dental specialties are recognized in those areas where advanced knowledge, skills and training are greater than those taught in a pre-doctoral dental education program.

A dental specialty is an area of dentistry that has been formally recognized by the National Commission on Recognition of Dental Specialties and Certifying Boards. Currently there are 12 dental specialties recognized by the National Commission including Oral and Maxillofacial Pathology, Oral and Maxillofacial Radiology, Oral and Maxillofacial Surgery, Dental Anesthesiology, Dentofacial Orthopedics, Pediatric Dentistry, Endodontics, among others. Wisconsin's dental practice act generally avoids getting into the specific listing of titles and specialties, apart from defining who can call themselves a dentist. In the practice act, 447.03 (b):

(1) Dentists. Except as provided under sub. (3) and ss. 257.03 and 447.02 (3), no person may do any of the following unless he or she is licensed to practice dentistry under this chapter:

(b) Use or permit to be used, directly or indirectly, for a profit or otherwise for himself or herself, or for any other person, the title, or append to his or her name the words or letters, "doctor", "Dr.", "Doctor of Dental Surgery", "D.D.S.", or "D.M.D.", or any other letters, titles, degrees, terms or descriptive matter, personal or not, which directly or indirectly represent him or her to be engaged in the practice of dentistry.

Further, there are administrative rules surrounding unprofessional advertising, Chapter DE 6:

DE 6.02 Unprofessional advertising. The following, without limitation because of enumeration, constitute unprofessional advertising:

(c) Notice of a practice as a specialist in a dental specialty unless the dentist has successfully completed a post-doctoral educational training program approved by the Commission on Dental Accreditation of the American Dental Association in a specialty recognized by the American Dental Association. Advertising as a specialist in a non-American Dental Association-recognized specialty is prohibited.

WDA members are committed to promoting professional excellence and quality oral health care. Again, on behalf of our more than 3,100 member dentists, the WDA appreciates the effort to-date to clarify that Senate Bill 143 is not intended to include the practice of dentistry and, if necessary, will seek an amendment to ensure Senate Bill 143 does not create unintended consequences for our member dentists.

