



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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The Honorable John Carney,
Governor

John McNeal, Director
SCPD

MEMORANDUM

DATE: February 27, 2024

TO: Division of Professional Regulation
Board of Dentistry and Dental Hygiene

FROM: Benjamin Shrader, Chairperson 
State Council for Persons with Disabilities

RE: Proposed DE Board of Dentistry and Dental Hygiene Regulation 1100, 27 Del.
Register of Regulations 584 (February 1, 2024)

The State Council for Persons with Disabilities (SCPD) has reviewed the proposed changes to the Delaware Board of Dentistry and Dental Hygiene regulations.

SCPD has the following comments and recommendations:

SCPD supports the edits being made to the regulation to remove redundancy. However, SCPD would be remiss if we did not also take this opportunity to encourage the Board of Dentistry to consider our request to include education centered on accessibility for Delawareans with disabilities in the Continuing Professional Education (CPE) and renewal process.

- Currently there are no accessibility training recommendations or requirements in Section 6.0. The absence of accessibility training is problematic for individuals with disabilities. One study reported on in the *New York Times* several years ago held focus groups with doctors and specialty health care providers. In that anonymous format, the providers admitted to broad disability discrimination, including refusing new patients because of their disabilities, to avoid having to: accommodate them, figure out how to communicate with them, or give them extra time (because they believed they were going to take more time than non-disability patients).¹

- Considering this, it is unsurprising that per the American Institute of Dental Public Health, “many [individuals with disabilities] do not seek routine dental care as a result of [...] barriers and challenges, and when they do seek dental care, it’s often because of expensive emergencies that could have been easily prevented.”²

SCPD supports the edits being made to the regulation to remove redundancy and further urges the board to add the inclusion of two (2) CPE credit hours of accessibility training for dental professionals every two (2) years.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our observations or recommendations on the proposed regulation.

¹ *These Doctors Admit They Don’t Want Patients with Disabilities*, NEW YORK TIMES, October 19, 2023, <https://www.nytimes.com/2022/10/19/health/doctors-patients-disabilities.html>

² *Disabilities and Dental Care: Why More Must Be Done to Improve Access*, AM. INST. OF DENTAL PUB. HEALTH, Jun. 26, 2023, <https://aidph.org/disabilities-and-dental-care-why-more-must-be-done-to-improve-access/>.

cc: Ms. Marissa Band, Esquire CLASI, DLP
Governor’s Advisory Council for Exceptional Citizens
Developmental Disabilities Council