Legislative Analysis

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DENTAL SPECIALIST TITLE

House Bill 4593 (H-4) as reported from committee
Sponsor: Rep. Matthew Bierlein

House Bill 4594 (H-1) as reported from committee
Sponsor: Rep. Jasper R. Martus

1st Committee: Health Policy
2nd Committee (HB 4593): Rules
Complete to 2-24-26

SUMMARY:

House Bill 4593 would amend the Public Health Code to prohibit a dentist from presenting themselves as a specialist in any of the recognized specialty fields unless they hold the appropriate license. The bill would also bar dentists from claiming to specialize in areas of dentistry for which a specialty field license does not exist under the code. These provisions would be effective beginning 90 days after the bill takes effect.

Under current law, the Board of Dentistry may issue specialty field licenses to dentists who complete advanced training and demonstrate competence in one or more of 12 recognized fields: prosthodontics, endodontics, oral and maxillofacial surgery, orthodontics, pediatric dentistry, periodontics, oral pathology, oral medicine, orofacial pain, dental public health, oral and maxillofacial radiology, and dental anesthesiology. Dentists without a specialty license may still perform procedures in these areas.

The bill would expressly prohibit a dentist who has not been issued a health profession specialty field license as described above from doing either of the following:

- Announcing, representing, or advertising that they are a dental specialist or otherwise holding themselves out to the public as a dental specialist.
- Announcing, representing, or advertising that they specialize in an area under the practice of dentistry for which a health profession specialty field license does not exist under the code or otherwise holding themselves out to the public as a dentist who specializes in such an area.

It would not be a defense to a violation of the above prohibition that the dentist did not use a title for a health profession specialty field license that is protected under section 16605 of the code (which House Bill 4594 would amend) or that the dentist provided a disclaimer that they do not hold a health profession specialty field license.

MCL 333.16608

House Bill 4594 would amend the Public Health Code to add the term "dental specialist" to the list of reserved professional titles that may only be used by individuals who have

obtained the necessary qualifications and licensing. These provisions would be effective beginning 90 days after the bill takes effect.

Under the code, certain titles, such as "dentist," are restricted to use by licensed health professionals. The bill would add "dental specialist" to that list, prohibiting individuals without the proper specialty license from representing themselves using that title.

MCL 333.16605

Neither bill can take effect unless both bills are enacted.

BRIEF DISCUSSION:

According to committee testimony, some dentists market themselves as specialists in fields that are not formally recognized as specialties under Michigan law, such as cosmetic dentistry or implantology, or present themselves in ways that imply specialty credentials they do not hold. This practice became more common after settlement of a 2020 federal lawsuit involving the Department of Licensing and Regulatory Affairs (LARA), which resulted in rule changes allowing general dentists to advertise specialization in areas that do not have a corresponding specialty license under the Public Health Code.

Dentists and orthodontic specialists who testified described situations where patients assumed a provider was a licensed specialist based on website language, office signage, or placement within a pediatric or orthodontic practice setting. In several examples, patients later learned that the provider was a general dentist, sometimes after receiving inadequate treatment, experiencing complications, or requiring corrective care. Testimony emphasized that patients often rely on specialty labels when making decisions about complex or high-risk procedures and may not be aware of the extensive training, examinations, and licensure requirements associated with recognized dental specialties.

Supporters of the bills noted that they would not restrict dentists from performing procedures within their scope of practice, but would change how dentists may represent their credentials, ensuring that terms such as "specialist" or "dental specialist" are used only by individuals who hold an approved specialty license. Supporters argued that this would support accurate patient information and improve transparency in provider advertising, without affecting access to dental services.

FISCAL IMPACT:

House Bills 4593 and 4594 would likely have minimal to no fiscal impact on the Department of Licensing and Regulatory Affairs. House Bill 4593 would prohibit dentists who have not been issued a health profession specialty field license from presenting themselves as dental specialists. This may create potential violations that LARA may investigate and issue disciplinary actions for. To the extent that violations of the new provisions occur, additional fine revenue may be realized and enforcement costs incurred.

POSITIONS:

Representatives of the following entities testified in support of the bills (10-29-25):

- Michigan Association of Orthodontists
- American Academy of Pediatrics – Michigan Chapter

The following entities indicated support for the bills (10-29-25):

- Michigan Dental Association
- Council of Michigan Dental Specialists

Legislative Analyst: Leah Doemer
Fiscal Analyst: Una Jakupovic

■ This analysis was prepared by nonpartisan House Fiscal Agency staff for use by House members in their deliberations and does not constitute an official statement of legislative intent.