

Resolution No.	10	New <input checked="" type="checkbox"/>	Substitute <input type="checkbox"/>	Amendment <input type="checkbox"/>
Submitted By:	CDEL & CDHPHD			
Date Submitted:	April 11, 2025	Reference Committee <input checked="" type="checkbox"/>	Direct to House <input type="checkbox"/>	
Total Financial Implication:	\$ none			
Amount One-time	\$ none	Amount On-going	\$ none	

Redefining New York State's PGY-1 Licensure Requirement

1 **Background:** In recent years, New York State has faced concerns about a potential
2 migration of dentists to other states, which has led to claims that the state's Post-
3 Graduate Year 1 (PGY-1) pathway to licensure may be a contributing factor. To address
4 this concern, the Board of Trustees referred Resolution 16H-2024 PGY-1, passed at the
5 2024 HOD, to the Council on Dental Health Planning and Hospital Dentistry (CDHPHD)
6 and the Council on Dental Education and Licensure (CDEL). The councils were charged
7 with reevaluating the PGY-1 model and its impact on licensure, migration, and the supply
8 of dentists in New York and to bring a recommendation to the 2025 NYSDA HOD. Both
9 councils formed subcommittees and held joint meetings to evaluate the issue and
10 explore the potential implications of the PGY-1 pathway on the state's dental workforce.

11 As a result of its PGY-1 initiative, since 2007, New York State has mandated completion
12 of a CODA-accredited post-doctoral training program rather than passage of traditional
13 examinations for licensure. In fact, the rationale for the initiative dates back more than
14 two decades, and was intended to address among other things, concerns about the
15 licensure process itself. However, in the intervening years, some have suggested PGY-
16 1 places those seeking initial licensure in New York State at a competitive and
17 geographic disadvantage. Since its inception, PGY-1 has had a positive impact for
18 reasons that will be explored later in this statement. However, the concerns about the
19 examination itself have been ameliorated as advances in competency-based dental
20 education have emerged.

21 For example, most dental schools now use competency-based curricula, with rigorous
22 internal assessments and simulation-based training, allowing dental students to
23 graduate with documented clinical competence. There is also wide-spread integration of
24 Objective Structured Clinical Examinations (OSCEs) and comprehensive case
25 evaluations to ensure preparedness. Nonetheless, as the breadth of dental school
26 education has expanded to keep pace with emerging technology and the development
27 of new diagnostic tools and procedures, it remains confined to a four-year curriculum
28 which in and of itself has created constraint. Conceptually, PGY-1 provides that relief

valve, whether it be in a General Practice Residency (GPR), an Advanced Education in General Dentistry Program (AEGD), or any of the other CODA-approved post-doctoral training by providing an additional year for enhanced clinical experience, and improved patient safety.

In proposing this resolution, the councils are advocating to allow residents to apply for New York State licensure following the completion of the first year of a GPR, an AEGD, or the first year of a multi-year CODA-accredited post-doctoral training program. Currently, graduates of multi-year specialty programs are unable to apply for licensure until they complete the entire program, which imposes a significant financial burden on residents. Additionally, after graduation, there can be considerable delays in obtaining a New York State license. Insurance providers, including Medicaid, require dental providers to have an active license before they can be enrolled in their network. This process can result in delays of up to six months before residents are able to begin practicing at full capacity. This financial strain is especially burdensome given the substantial student debt most recent graduates carry.

The councils strongly support the proposal to allow residents to apply for licensure after completing their first year of a multi-year CODA-accredited post-doctoral program, provided they also complete the CDCA-WREB-CITA-administered ADEX clinical licensing exam. This change would alleviate the financial pressures on residents and improve access to care for underserved populations across New York State.

One of the primary theories behind this review was the assertion that the PGY-1 pathway may be deterring dentists from seeking licensure and employment in New York, contributing to a workforce shortage in certain regions of the state. However, a closer examination of the data contradicts this assumption. According to the American Dental Education Association (ADEA), approximately 6,500 pre-doctoral students are at the D4 level nationally, with approximately 3,785 pursuing post-graduate training. Of that number, approximately 1,735 are training in the 125 post-graduate training programs in New York State, accounting for approximately 46% of the post-graduate dental trainees nationwide (1). The data reviewed during this process does not suggest that dentists are leaving New York due to the PGY-1 pathway; rather, it indicates that the PGY-1 pathway plays a vital role in bringing dentists into New York to care for underserved populations.

Additionally, the ADA's U.S. Data Migration Dashboard shows a net migration of -7.0% for dentists with less than 10 years of experience from New York State between 2019-2022 (2). While this indicates a migration trend, it is important to note that these dentists would have already obtained licensure through the PGY-1 pathway. Therefore, it is

inaccurate to assume that the migration is connected to the PGY-1 requirement. In fact, the migration of dentists from New York is likely a result of the significant influx of dental residents coming into the state for training, which can lead to a temporary surplus of new practitioners.

As of January 1, 2025, New York State has 18,335 licensed dentists, a considerable number of whom are concentrated in downstate areas (3). The challenge facing New York's dental workforce is not migration, but the uneven distribution of dentists across the state. Certain regions, particularly in upstate New York, are facing a lack of access to dental care, a problem that stems from the regional distribution of dentists rather than a statewide shortage (3).

Both councils strongly oppose the assumption that the PGY-1 pathway is causing dentists to leave New York. Furthermore, both councils vehemently oppose the elimination of PGY-1 or its modification to make it acceptable as an alternate pathway to licensure. Such a move would exacerbate regional access to care issues, potentially creating a statewide shortage of dental care that could be much harder to resolve. The PGY-1 pathway currently plays a critical role in ensuring that underserved populations in New York receive the dental care they need, and its removal would have detrimental effects on patient access to care throughout the state.

Accordingly, the following resolution is jointly submitted for consideration by the Councils on Dental Health Planning and Hospital Dentistry, and Dental Education and Licensure:

References:

- (1) Istrate EC, Kimner S, Booker CL, West KP. ADEA Trends in Dental Education 2024-25: A New Beginning for Oral Health Education. Washington, DC: American Dental Education Association (ADEA); 2025.
- (2) American Dental Association. (n.d.). *Dentist migration dashboard*. Health Policy Institute. Retrieved April 2, 2025, from <https://www.ada.org/resources/research/health-policy-institute/dentist-migration-dashboard>
- (3) New York State Education Department. (n.d.). *License statistics for dentists*. New York State Education Department. Retrieved April 7, 2025, from <https://www.op.nysed.gov/professions/dentists/license-statistics>

10. Resolved, that NYSDA seek legislation that would enable a graduate of a Commission on Dental Accreditation (CODA) accredited dental school who has

100 successfully completed either:

- 101 • a CODA-accredited General Practice Residency (GPR);
- 102 • a CODA-accredited Advanced Education in General Dentistry Program
- 103 (AEGD) or;
- 104 • the first year of a multi-year CODA accredited post-doctoral training program
- 105 and the CDCA-WREB-CITA-administered ADEX clinical licensing exam, to
- 106 qualify for licensure in New York State.

107 **Board Comments:** The Board supports this proposed change to dental licensure which

108 would help dentists participating in multi-year residents to receive their license prior to

109 the completion of that residency. Receiving a license while within residency should

110 indeed relieve the resident from using institutional credentials for certain administrative

111 and clinical tasks. It would also allow the dentist to work outside of the residency as time

112 permits, to help offset their living expenses

113

114 **BOARD RECOMMENDATION: VOTE YES**

name	yes	no	abstain	absent	name	yes	no	abstain	absent	name	yes	no	abstain	absent
Casper-Klock	x				Greenberg	x				Korkosz		x		
Cuomo	x				Hills	x				Miller	x			
Demas	x				Jackson	x				Rothas	X			
Edwards	x				Jacobo	x				Samuels	x			
Gamache	x				Jonke	x				Scharoff		x		
Giordano	x									Stacy	X			
										Res #10				

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