

Deputy State Auditor Tim Ashe  
Office of the Vermont State Auditor  
132 State Street  
Montpelier, VT 05633

Dear Deputy Auditor Ashe,

Thank you for your continued engagement with Vermont State Colleges and for your office's interest in the progress of our proposed Dental Therapy Program. Earlier this year, after carefully observing the program, I asked my team to do a thorough review to help inform what I believed was the need for decisive action after years of fits and starts to get it up and running. I am writing today to share the findings of that comprehensive assessment of the program's feasibility and, based on this evaluation, to provide clarity on our path forward.

As the enclosed report outlines, despite nearly a decade of good faith efforts by Vermont State Colleges and Vermont State University (VTSU) — including curriculum development, facility upgrades, and recruitment attempts — implementation of a Commission on Dental Accreditation (CODA)-accredited Dental Therapy Program is not feasible. While the program's goals were aligned with our shared interest in expanding access to oral health care in Vermont's rural communities, significant and persistent barriers ultimately prevent us from moving forward.

Among the most pressing challenges are:

**Financial infeasibility:** Annual per-student costs are projected to exceed \$96,000 under market-rate staffing models — a level far beyond the resources of a tuition-driven institution like VTSU.

**Faculty recruitment limitations:** The wage gap between market salaries for licensed dentists and what our collective bargaining agreement allows has made it impossible to attract and retain qualified faculty or a program director.

**Accreditation and cohort size requirements:** With CODA-mandated clinical ratios and a maximum feasible cohort of 15 students, the economies of scale necessary to sustain a program are not attainable.

**COVID and Transformation Challenges:** The program's development also faced significant headwinds from disruptions including the COVID-19 pandemic and the large-scale transformation and unification of the Vermont State Colleges system which strained resources and capacity during a critical development period.

Given these realities, it is unfortunately no longer prudent to dedicate scarce institutional and public resources to a model that is not financially or operationally viable. While the goal of expanding access to care through mid-level providers bridging the skills gap between dental hygienist and dentist is admirable, dental therapy remains a very new and largely undeveloped field nationally. Nearly a decade after CODA established standards, only three states have accredited programs, and widespread implementation has yet to materialize, underscoring that challenges are not unique to us.

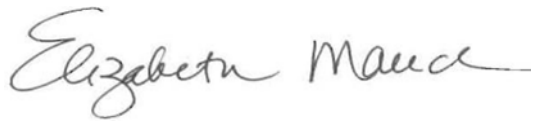
VTSU will continue its focus on our highly successful Dental Hygiene Program — a proven, high-demand, and well-paying field that is poised to grow. Thanks to \$6.2 million in recently secured federal funding, we are preparing to double our dental hygiene cohort capacity from 24 to 48 students beginning in Fall 2027. This expansion is a strategic response to acute oral health workforce shortages and will significantly enhance access to preventive oral health care across Vermont, especially in underserved rural regions.

Our Dental Hygiene Program already plays a critical role in public health through early disease detection, health education, and frontline care delivery. Expanding this program allows us to utilize the equipment already on hand, build on existing strengths, produce job-ready graduates, and meet Vermont's urgent need for skilled oral health professionals — all while ensuring fiscal responsibility and institutional sustainability.

I appreciate the continued interest of your office and the Vermont Legislature in supporting efforts to improve access to health care in rural communities. I know there were high hopes for dental therapy as a new field with great potential and that may be the case for other institutions of higher education. Although the path to a dental therapy program proved unworkable, I am confident that our continued focus on dental hygiene will provide ongoing opportunities for us to improve care for Vermonters and opportunities for our students.

Please don't hesitate to reach out should you have any questions about the assessment or our future plans.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Mauch". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Chancellor Elizabeth Mauch  
Vermont State Colleges

CC: Secretary Jenney Samuelson, Monica Hutt, Pro Tem Phil Baruth, Speaker Jill Krowinski, Senator Ginny Lyons, Rep. Alyssa Black, Senator Alison Clarkson, Rep. Mike Marcotte



# Dental Therapy Feasibility Assessment

June 2025

# Vermont State Colleges: Dental Therapy Assessment June 2025

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# Vermont State Colleges: Dental Therapy Assessment June 2025

## Background

Vermont faces significant challenges in maintaining an adequate dental workforce due to its aging dentists and predominantly rural setting. The obstacles of geographic isolation, provider shortages, and an aging workforce have exacerbated access to dental care, especially in underserved and remote areas. This issue is common among rural states with dispersed populations. In response, the Commission on Dental Accreditation (CODA) established accreditation standards for dental therapy in 2015. These standards define a midlevel dental provider capable of offering preventive care and restorative services, such as filling cavities. This credential aims to enhance access to oral health services in rural communities by increasing the number of providers.

In 2016, Vermont enacted Act 161, becoming the third state to authorize licensing dental therapists, following Alaska and Minnesota. The act stipulates that dental therapists must be eligible for Vermont's dental hygiene license. Vermont Technical College, now Vermont State University (VTSU), accepted the program at the legislature's request. To support the program's establishment, Vermont allocated \$400,000.

Since Act 161's passage, eleven more states—Arizona, Colorado, Connecticut, Idaho, Maine, Michigan, Nevada, New Mexico, Oregon, Washington, and Wisconsin—have approved dental therapy licensure. Currently, only Alaska, Minnesota, and Washington offer Commission on Dental Accreditation (CODA)-accredited dental therapy programs. No additional states have launched accredited programs since CODA set the standards in 2015.

Despite earnest efforts over the last 9 years, various systemic and structural barriers have hindered full program implementation. Challenges include limited resources of a small rural institution, financial viability concerns, insufficient clinical infrastructure, recruitment difficulties, and systemic reorganizations within Vermont State Colleges. Although actions such as equipment procurement and facility improvements were promptly executed, curriculum development encountered persistent obstacles. These included evolving accreditation standards, COVID-19-related disruptions, and staffing issues. These challenges are compounded by ongoing provider shortages, an aging workforce, and wage limitations—the very issues Vermont sought to address with dental therapy licensure.

Chancellor Elizabeth Mauch, who has been in the role since January 2024, asked for an assessment of the status and potential future of the dental therapy program. Her goal is to ensure that any program the system adopts and invest in meets the needs of Vermont, Vermont State Colleges students, and is financially viable.

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## Current Challenges

### Resource Constraints

The Vermont State Colleges, including Vermont State University, operate with minimal margin for financial missteps. Since 2020, in partnership with the Administration and the Vermont Legislature, the VSC has diligently worked to ensure its continued viability. Under the transformational plan set out in the *Select Committee Future of Higher Education* this has included managing its structural deficit through both spending reductions and permanent revenue increases. Other measures taken include the merger of Vermont Technical College, Castleton University, and Northern Vermont University into Vermont State University, as well as staff layoffs, faculty buyouts, the restructuring of academic programs to focus on more financially viable options, and administrative consolidations. These rigorous measures have closed a \$20 million deficit.

By the fiscal year 2027, the Vermont State Colleges must present a fully balanced budget. To accomplish this, an additional \$5 million in structural budget savings is required during FY26. These savings and the corresponding balanced budget must be maintained indefinitely.

### Academic Program Financial Viability & Restructuring

An essential element of system-wide financial viability is the financial health of each academic program. While some programs will have fewer opportunities for revenue in excess of expenditures—especially in equipment intensive programs or programs with low teacher student ratios—most programs must be independently viable. Those programs requiring additional financial support must be within the institution’s available resources.

Therefore, there is now a careful assessment of each academic program at VTSU, including the number of students enrolled, the resources required to execute the program, and the financial viability of each program. This work, academic optimization, is an on-going effort which has resulted in a reduction of the university’s academic program to 78 undergraduate, and 17 graduate programs. Continued efforts in optimization through academic policy and fiscal review to further refine the scope of the university’s academic programs. These efforts, performed on both current **and** new programs is essential to VTSU’s financial sustainability.

### Faculty & Clinical Associate Wage Limitations

The *Agreement between the Vermont State Colleges and Vermont State Colleges Faculty Federation* stipulates the wages allowable for full-time faculty. These wages are markedly

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inconsistent with the average market wage of qualified dentists. The estimated market wage of a practicing dentist is approximately \$260,000 annually; however, the existing full-time faculty contract limits the wage to maximum of \$70,000. With an extraordinarily tight labor pool for dental providers in Vermont and New England dentists command a high wage for a schedule with significant work-life balance. The starting faculty wage is not competitive for dentists.

Clinical associates, those practitioners who oversee labs, practicums, and related activity, are paid \$45 an hour at Vermont State University. While this wage is adequate to support practicums for dental hygienists and nurses, it is only 36% of the estimated \$125 per hour necessary to compensate clinical associates for a dental therapy program due to the higher level of credential necessary to support the clinical rotations in dental therapy.

### Oral Health Workforce Limitations

Act 161 requires individuals seeking a dental therapy license to hold licensure as a Vermont dental hygienist. This requirement means that students enrolling in a dental therapy program in Vermont must first attend a dental hygiene program and obtain their dental hygiene license before achieving their dental therapy license.

As envisioned by the law, the proposed dental therapy program at Vermont State University includes a stackable program whereby a student completes the dental hygiene program first, then participates in additional instruction to learn the midlevel skills needed for dental therapy.

This dual program increases the number of sections necessary to support both dental hygiene and dental therapy, requiring more oral health instructors for both the existing program and the new dental therapy program. Regardless of the compensation limitations, with instructor student ratios for dental therapy of no more than 1:6 for lab and practical courses and no more than 1:10 for all other courses, Vermont lacks the number of oral health professionals willing and able to adequately support both the dental hygiene and dental therapy programs.

### Program Director

Per CODA guidelines, the director of an accredited dental therapy program must be a full-time employee of the institution and *“The program director **must** be a licensed dentist (DDS/DMD) or a licensed dental therapist possessing a master’s or higher degree. The director **must** be a graduate of a program accredited by the Commission on Dental*



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*Accreditation and who has background in education and the professional experience necessary to fulfill the program's missions and goals.”<sup>1</sup>*

Efforts to recruit qualified faculty and administrative personnel to design and implement a CODA-approved Dental Therapy Program have encountered significant hurdles. The development of a sustainable program requires not only a rigorous academic and clinical infrastructure, but also individuals with specialized experience in dental education and accreditation processes — a talent pool that is limited nationwide and especially difficult to source in rural regions.

Additionally, hiring a full-time program director has been challenged by the availability and market rate of dentists willing to live and work in Vermont. Vermont State University has limited resources and is unable to pay a dentist at market rate, estimated at more than \$275,000 a year, for this work. The VSC has struggled mightily to fill this role. VTSU went through multiple failed searches, and two directors in filling this role within the available compensation structure. Ultimately, the University resorted to stop-gap measure – hiring a part-time dentist to serve as director to develop the program until accreditation. This solution was unsuccessful, and the role was terminated.

## Programmatic Financial Analysis

Vermont State University envisions running three cohorts simultaneously once the program is fully operational. With each cohort having a maximum of six participants to accommodate practical placement and accounting for natural attrition of students over time, it is assumed the program will have approximately fifteen students enrolled at its peak.

These fifteen students would be supported by the following resources:

- Program Director
- One full-time faculty member
- One administrative coordinator/support resource
- Clinical Associates supporting 1,080 hours per academic year
- Part-time instructors (dentists) teaching fifty-four credits per academic year

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<sup>1</sup> CODA Accreditation Standards for Dental Therapy Education Programs, p. 32. [https://coda.ada.org/-/media/project/ada-organization/ada/coda/files/dental\\_therapy\\_standards.pdf?rev=331b56a2db1d4d34bfa47e9d38ce4d38&has h=4D6E6BD4E01F8757760D6C1174DF76B6](https://coda.ada.org/-/media/project/ada-organization/ada/coda/files/dental_therapy_standards.pdf?rev=331b56a2db1d4d34bfa47e9d38ce4d38&has h=4D6E6BD4E01F8757760D6C1174DF76B6)

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Using the Vermont State Colleges' current collective bargaining agreements, direct costs for the program are estimated at \$630,600 annually plus indirect (overhead) costs estimated at 33% of expenses or \$208,098 bringing total annual cost to \$838,697 or \$55,913 per year per student. The total cost to educate one dental therapist through the entire program is \$83,870.

### Current Formulation

<b>Full-Time Employees</b>	<b>Wages</b>	<b>Benefits</b>	<b>Total</b>
Program Director (DDS or similar)	175,000	69,038	244,038
Dental Faculty (DDS or similar)	65,000	45,003	110,003
Program Coordinator (Administrator)	60,000	43,910	103,910
Estimated Full-Time	300,000	157,950	457,950
<b>Part-Time Instruction</b>			
Clinical Associates (at \$45/hr)	48,600	3,718	52,318
Part-Time Instructors	111,780	8,551	120,331
Estimated Part-Time	160,380	12,269	172,649
Estimated Direct Cost	460,380	170,219	630,599
Direct Annual Cost Per Student			42,040
Estimated Indirect Cost (33%)			208,098
Indirect Annual Cost Per Student (33%)			13,873
<b>Cost to Education 1 Student for 1 year of Program</b>			<b>55,913</b>
<b>Cost to Educate 1 student through program</b>			<b>83,870</b>

The above budget is extremely optimistic as it reflects the wages for the program director, dental faculty, and clinical associates at the rates contemplated in existing bargaining agreements. However, as noted earlier in this report, wages for qualified dentists are higher than the VSC's current wages scale.

For example, the program director, who must be a full-time qualified dentist, will require a wage of approximately \$275,000. To hire and retain a qualified dentist to serve in a full-time faculty capacity approximately \$260,000 annually will be required. Additionally, clinical associate hourly wages are estimated at \$125 per hour. The result is a budget that is more than 28% higher.

Using these higher salary numbers, the estimated direct cost of the program is \$1,083,066 and the indirect cost is estimated at \$357,412, bringing total annual program cost to \$1,440,478 or \$96,032 per year per student. The total cost to educate one dental therapist throughout the entire program is \$144,048.

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## Market Rates

<b>Full-Time Employees</b>	<b>Wages</b>	<b>Benefits</b>	<b>Total</b>
Program Director (DDS or similar)	275,000	90,888	365,888
Dental Faculty (DDS or similar)	260,000	87,610	347,610
Program Coordinator (Administrator)	60,000	43,910	103,910
Estimated Full-Time	595,000	222,408	817,408
<b>Part-Time Instruction</b>	<b>Wages</b>	<b>Benefits</b>	<b>Total</b>
Clinical Associates (at \$45/hr)	135,000	10,328	145,328
Part-Time Instructors	111,780	8,551	120,331
Estimated Part-Time	246,780	18,879	265,659
Estimated Direct Cost	841,780	241,286	1,083,066
Direct Annual Cost Per Student			72,204
Estimated Indirect Cost (33%)			357,412
Indirect Annual Cost Per Student (33%)			23,827
<b>Cost to Education 1 Student for 1 year of Program</b>			96,032
<b>Cost to Educate 1 student through program</b>			<b>144,048</b>

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## Conclusion

After 9 years, and multiple attempts to make the program work, it has become clear that the dental therapy program at Vermont State University is currently not sustainable under the present model, despite the resources invested by the State, Federal Grants<sup>2</sup>, and University. Due to the high demand for dentists, their substantial salaries, and the small cohort sizes mandated by CODA guidelines, the operational costs of the program significantly exceed both the students' ability to pay and the Vermont State Colleges' capacity to subsidize it.

**Consequently, it is advised that Vermont State University cease its investment in the development of the dental therapy program to concentrate on dental hygienists.**

Despite the challenges inherent in launching a new Dental Therapy Program, Vermont State University **remains deeply committed to addressing the state's oral health workforce needs**. Leveraging its established expertise in Dental Hygiene, VTSU has secured \$6.2 million in federal funding to expand its existing program — a significant investment that will double cohort capacity from 24 to 48 students starting in Fall 2027.

This expansion represents a strategic response to the growing demand for preventive oral health services and access to care, especially in underserved areas of Vermont. The contributions of dental hygienists to public health are substantial and multi-dimensional:

1. **Prevention at the Core:** Dental hygienists provide essential preventive services that form the foundation of oral health, significantly reducing the incidence of dental disease and the long-term cost burden on the healthcare system.
2. **Front-Line Detection of Systemic Conditions:** As first point of contact, hygienists often detect early signs of systemic conditions — such as diabetes, cardiovascular disease, and oral cancer — that may otherwise go undiagnosed until advanced stages.
3. **Bridging Access Gaps in Underserved Communities:** Hygienists are uniquely positioned to deliver care in rural and low-resource settings, improving access for populations that often suffer from untreated oral disease due to longstanding neglect or systemic barriers.

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<sup>2</sup> The Vermont State Colleges received a Health Resources and Services Administration (HRSA) grant in in the amount of \$1.6 million. Funding for the grant included the design and purchase of equipment and actions to support development of a dental therapy program. All funds are fully expended, and the grant was closed out in 2024. Equipment and space modifications are actively in use by the existing dental hygiene program and will be further used by the expanded program,

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4. **Education and Empowerment:** Through outreach in schools, senior centers, and community clinics, hygienists provide culturally competent education that empowers individuals and families to maintain lifelong oral health.
5. **Integral Members of the Healthcare Team:** Dental hygienists play a vital role in interdisciplinary care models, supporting whole-body health by collaborating with medical providers, social workers, and behavioral health professionals.
6. **Expanded Practice to Meet System Demand:** Where allowed, hygienists practice to the full extent of their licensure, offering services such as anesthesia administration, temporary restorations, and periodontal therapy — reducing the burden on dentists and improving care delivery efficiency.

VTSU's continued investment in oral health education not only addresses current workforce shortages but also builds a resilient pipeline of skilled providers equipped to meet the evolving healthcare needs of Vermont's communities.