



Connecticut State Dental Association

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Commissioner Manisha Juthani, M.D.
Department of Public Health
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January 15, 2026

Subject: Request to Expand Mandatory Continuing Education Requirements to Include Training on Human Trafficking Awareness and Response

Dear Commissioner Juthani,

On behalf of the Connecticut State Dental Association, I am writing to respectfully request that the Department of Public Health expand the current mandatory continuing education (CE) requirements for licensed dentists to include specific training on recognizing and responding to signs of human trafficking.

Currently, the requirement is for dentists to complete training to identify signs of sexual abuse and domestic violence. While this is an essential safeguard for vulnerable populations, CSDA believes that expanding this requirement to include human trafficking awareness and response would provide a critical additional layer of protection to those at risk.

The American Dental Association (ADA) recognizes human trafficking as a serious public health issue and supports education for dental teams to help identify and respond appropriately to potential trafficking situations. Research shows that the United States is a top destination for child trafficking. Estimates suggest that the number of victims may reach into the hundreds of thousands.

Studies indicate that 68% of trafficking victims encounter a healthcare professional during their exploitation, and 26.5% have seen a dentist. This positions dental professionals uniquely to identify potential victims. The nature of dental care—private, one-on-one interactions and close examination of the head, neck, and oral cavity—allows for the observation of both physical and behavioral indicators that may not be apparent in other settings.

Victims often present with a range of oral and systemic health issues, including dental pain, fractured teeth, malnutrition, facial injuries, and signs of physical abuse. Beyond

these clinical signs, behavioral cues such as a controlling companion, reluctance to speak, or inconsistencies in medical history can signal that a patient is under coercion or control. With appropriate training, dental teams can learn to identify these indicators and respond effectively and safely in accordance with legal and ethical obligations.

Moreover, the ADA Principles of Ethics and Code of Professional Conduct require dentists to report suspected abuse or neglect in compliance with state law; we advocate that Connecticut join a growing lists of states that mandates our dental teams be trained in this area. The U.S. Department of Health & Human Services provides clear guidance that reporting potential trafficking situations is permissible under HIPAA when patient identifiers are protected. By formalizing education on these standards, Connecticut can ensure that its dental professionals are both informed and confident in meeting their responsibilities.

Several states have already implemented CE requirements related to human trafficking awareness for health professionals, recognizing that such training saves lives and supports law enforcement and victim services. Connecticut's dental professionals are ready and willing to be part of this public health response.

CSDA urges the Department to consider adopting a rule or policy that mandates continuing education on human trafficking awareness and response as part of the license renewal process for dentists and dental hygienists. Such a measure would strengthen Connecticut's commitment to protecting vulnerable individuals and align with national best practices supported by the ADA and federal health agencies.

Thank you for your time, consideration, and for your continued commitment to public health and patient safety. I would be happy to provide supporting research, sample curricula, or testimony to assist in developing this initiative.

Respectfully submitted,



Kathlene Gerrity
Executive Director

cc: Senator Saud Anwar, Public Health Committee
Representative Cristin McCarthy Vahey, Public Health Committee
Dr. Peter Katz, CT Dental Commissioner
Adam Skowera, DPH
Miriam Miller, DPH