



Sheli Cobler,
Executive Director

DENTAL AND DENTAL HYGIENE COMPACTS – WHAT IS IN THE fine print... And WHAT IS THE IMPACT on Dentistry?

There is so much to know and so many questions that arise when reading through the proposed dental and dental hygiene compacts that unfortunately, it is impossible to unpack it all in one small article. Thus, this article will highlight just a few things to consider.

The impact the compacts, as written, could have on the dental profession creates concern for CRDTS as an agency that has been providing excellence in dental and dental hygiene testing for more than half a century, and for many of our Members. There is no doubt that portability for dental professionals is desired and important. There is no doubt that with the right language dental and dental hygiene compacts could enhance portability options for dental professionals.

However, if not carefully written the dental and dental hygiene interstate compacts may negatively impact the standard of care established by states. While portability is important, the mission of state dental boards is to protect the safety and welfare of the public. If state dental boards cannot enforce the requirements for dental and dental hygiene licensure in their respective states, the quality of dentistry may be at risk. Furthermore, with some minor tweaks, the matter of portability can be improved with the licensure through credentialing laws that are already in place in 49 of the 50 U.S. states. A compact will only complicate the matter further.

For example, 43 of the 50 states that accept clinical licensure examinations as a pathway toward licensure require a psychomotor hand skills component by law or rule. These laws were put into place to protect the safety and welfare of the public. With the Council on State Governments (CSG) Dental and Dental Hygiene (DDH) Compact, participating states must “Require for licensure that applicants successfully complete a Clinical Assessment” (Section 3, A. 10. DDH Compact). Great. However, Clinical Assessment is defined as, “an examination or process required for licensure as a Dentist or Dental Hygienist as applicable that provides evidence of clinical competence in dentistry or dental hygiene.” (Section 2. D. DDH Compact). There is no requirement that the assessment include a hand skills component.

Only six states currently accept the Dental Licensure Objective Structured Clinical Examination (DLOSCE) which is a computer based **written-only** examination with **no hand skills assessment** developed by the American Dental Association (ADA)/Joint Commission on National Dental Examinations (JCNDE). This means that if a licensee from a state that does not require a hand skills assessment participates in the compact and requests privilege in a state that **does** require a hand skills assessment, the participating state must grant that privilege and **does not have the authority to require a hand skills assessment** before that licensee practices in the respective state. If the overwhelming majority of state’s have included the requirement for a hand skills assessment for licensure in their laws, it would seem not only appropriate but absolutely necessary that the state legislators look to the state dental boards for guidance about the effect this compact language may have on the standards set forth in a respective state’s laws. Unfortunately, in many cases the dental boards are not being consulted and bills introducing the legislation are moving forward this very legislative session.

The CSG partnered with the Department of Defense, the American Dental Association (ADA), and the American Dental Hygienist’s Association (ADHA) to write the compact language and in January of 2023, before most dental professionals or even members of state dental boards knew anything about the proposed compact, the compact was lobbied and was enacted into three states. It continues to be heavily lobbied and is being introduced into legislation in the 2024 legislative session in ten or more states. In order to come into effect, the CSG DDH Compact must be enacted into law in seven states.

It is concerning that laws may be passed that impact the dental profession without the input of the very professionals charged with enforcing those laws. Some state dental board members are learning about the language of the compacts AFTER the legislation has been introduced or even adopted. How is it that state dental boards, those bodies that must enforce the laws that protect the public, are not the first to be asked for a position on legislation that will impact their responsibility and authority?

Proposed as an alternative to the CSG DDH Compact, is the AADB Dental and Dental Hygiene Compact (AADB Compact). The AADB compact was discussed at the most recent AADB Annual Meeting. Authors of the compact were noted to be employees of the CDCA/WREB/CITA testing organization and a couple of board attorneys from states that accept only the ADEX examination which is administered solely by CDCA/WREB/CITA. The AADB Compact requires that participants in the compact have successfully completed the ADEX exam. Those having completed a different clinical examination may be grandfathered in if taken prior to January 2024. Currently, 41 of the 50 states in the U.S. accept more than one clinical licensure examination,

DENTAL AND DENTAL HYGIENE COMPACTS – WHAT IS IN THE fine print... Continued...

thus a very small minority of states will be able to enter such a compact without having their current laws and rules impacted. Portability and an easier method of licensure is said to be the main idea behind the compacts. However, if that were the case, it seems counter-productive to ask the majority of the U.S. to ignore their own state's laws in favor of one testing agency. A monopoly, I'm sure we can agree, is a dangerous thing. Competition is what drives higher standards, accountability, and cost control. Certainly, there is a better solution to enhanced opportunities for portability among dentists and dental hygienists than the compromise of laws that are already in place for the purpose of public safety.

CRDTS has been providing a standard of excellence in dental and dental hygiene testing since 1968. The leadership of the organization consists of a group of dental and business professionals who are passionate about the dental profession and believe that licensure examinations are critical in ensuring competency for new dental and dental

hygiene graduates. I've heard it said by many examiners that before they became examiners they didn't know if the clinical licensure exams were beneficial but after examining and seeing the 1-3% of students that are not quite ready to practice, they too became passionate about the importance of the exams as a means of assessing minimal competency for the benefit of protecting the safety of the public.

As an agency that has no financial interest in either of the currently proposed dental and dental hygiene compacts, the goal is to help raise awareness of details in the language of the proposed compacts. Our mission is to serve and assist licensing boards with their mission to protect the health, safety and welfare of the public.

Whether you are a dentist or dental hygienist, board member or educator, it is important that you know the impact a compact could have on the dental profession.

Sheli Cobler
CRDTS Executive Director