

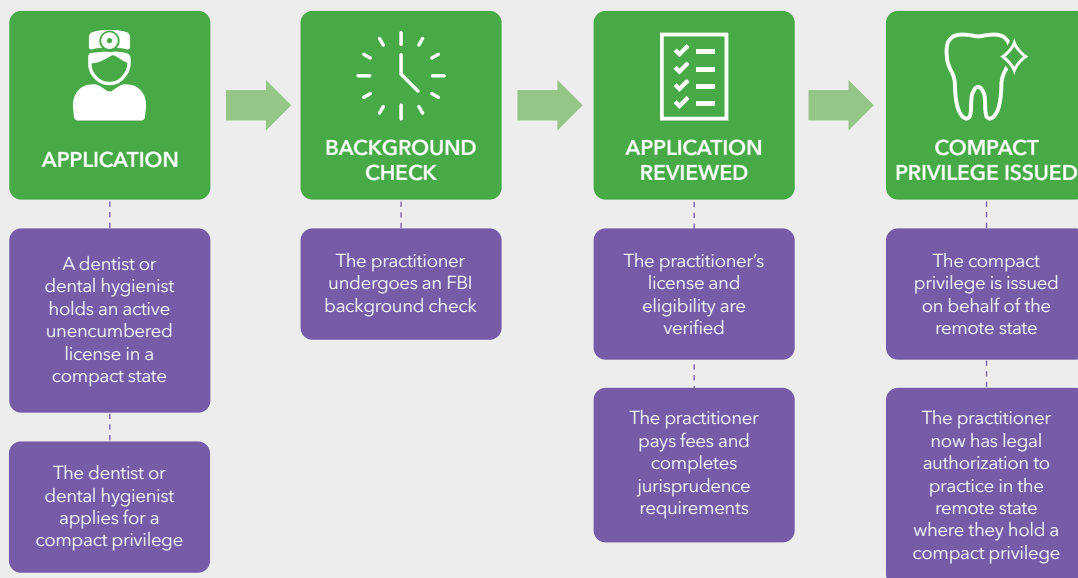


# DDH Dentist and Dental Hygienist Compact

This project is funded by the Department of Defense

## What is the Dentist and Dental Hygienist Compact?

The Dentist and Dental Hygienist Compact is an interstate occupational licensure compact. Interstate compacts are constitutionally authorized, legally binding, legislatively enacted contracts among states. This compact enables licensed dentists and dental hygienists to practice in all states participating in the compact, as opposed to them obtaining an individual license in every state they want to practice.



## What other professions have an interstate compact?

Interstate Medical Licensure Compact (IMLC)

Nurse Licensure Compact (NLC) and Advanced Practice Nurse Compact (APRN Compact)

Emergency Medical Service Officials Licensure Compact (EMS Compact)

Physical Therapists Licensure Compact (PT Compact)

Psychology Interjurisdictional Compact (PSYPACT)

Audiology and Speech-Language Pathology Interstate Compact (ASLP-IC)

Occupational Therapy Interstate Licensure Compact (OT Compact)

Counseling Interstate Licensure Compact



**National Center for Interstate Compacts**  
THE COUNCIL OF STATE GOVERNMENTS

# Who can use the Dentist and Dental Hygienist Compact?

A dentist or dental hygienist is eligible to participate in the compact if they have:

- An active, unencumbered license in any state participating in the compact.
- Passed the National Board Examination or other exam accepted by the compact commission.
- Completed a clinical assessment.
- Graduated from an education program accredited by the Commission on Dental Accreditation.
- No disqualifying criminal history.

## BENEFITS OF THE DENTIST AND DENTAL HYGIENIST COMPACT FOR LICENSEES:



Facilitates multistate practice.



Enhances license portability when changing state of residence.



Expands employment opportunities into new markets.



Improves continuity of care when patients or providers relocate.



Supports relocating military spouses.



Reduces burden of maintaining multiple licenses.

## BENEFITS OF THE DENTIST AND DENTAL HYGIENIST COMPACT FOR REGULATORS:



Reduces administrative burden.



Facilitates practitioner mobility during public health emergencies.



Ensures retention of jurisdiction over practitioners working in their state.



Expands state licensure board cooperation on investigations and disputes.



Enhances public safety through shared data system.

## BENEFITS OF THE DENTIST AND DENTAL HYGIENIST COMPACT FOR STATES:



Promotes workforce development and strengthens labor markets.



Expands consumer access to highly qualified practitioners.



Preserves state sovereignty.



Increases collaboration among states.

## What's Next?

The Council of State Governments (CSG) has facilitated the development of the Dentist and Dental Hygienist Compact model legislation. This legislation has been finalized for introduction during 2023 legislative sessions. Each state must enact the model legislation to join the compact. Supporters of the compact can contact the state chapter or national office of their professional membership association and state legislature to advocate for the interstate compact.

To get involved or learn about advocating for the interstate compact, please visit [ddhcompact.org](https://ddhcompact.org).

# DDH Dentist and Dental Hygienist Compact

## Development Process

*This project was funded by the Department of Defense*

The Department of Defense has sought to support the development of interstate compacts as a mechanism for ensuring the professional licenses of military spouses are easily portable. In September 2020, the Department of Defense entered into a cooperative agreement with The Council of State Governments to fund the creation of new interstate compacts designed to strengthen occupational licensing portability. In collaboration with the Department of Defense, CSG developed and administered a competitive application process to select the professions for initial compact development. Eligible applicants included associations of professionals, associations or federations of state licensing boards, coalitions of state licensing boards and national credentialing bodies for professions licensed in at least 30 states.

In 2021, the Department of Defense and CSG announced that the American Dental Association (ADA) and the American Dental Hygienist Association (ADHA) were both successful applicants. CSG, ADA, and ADHA then transitioned into drafting the model compact legislation. To develop recommendations guiding the drafting of the Dentist and Dental Hygienist Compact, CSG, ADHA and ADA brought together a Technical Assistance Group made up of state board members, board administrators, members of professional associations, licensed dentists and dental hygienists and other stakeholders. The group met over the course of several months to determine the needs of the profession and the compact model, dentist and dental hygienist mobility patterns, and current licensure systems.

### Technical Assistance Group Members:

Ann Lynch, American Dental Hygienists' Association  
Dr. Anthony Ziebert, American Dental Association  
Dr. Ariana Terlet, Drs. Terlet & Aziz  
Dr. Arthur Hickham Jr., Louisiana State Board of Dentistry  
Betty Kabel, North Florida Medical Center  
Bridgett Anderson, Minnesota Board of Dentistry  
Carmen I. Negron-Dupee  
Catherine Cabanzon  
Charlene A. Meagher, Washington Dental Hygiene  
Dr. Christine Hammer, Kidz Place Dentistry  
Colton Cannon, American Student Dental Association  
Dr. David L. Carsten, Washington Dental Quality Assurance Commission  
Dr. David L. Nielson, Alaska Board of Dental Examiners  
Dr. Debra A. Woo, University of the Pacific, Dugoni School of Dentistry  
Dr. Denise Claiborne, Old Dominion University  
Doug Wolfbeg, Page, Wolfberg & Wirth, LLC  
Jill Stueker, Iowa Dental Board  
Karen Hart, American Dental Association

Dr. Kelley Ryals, Santa Fe Modern Dentistry and Orthodontics  
Dr. Kumar Subramanian, Ohio State Dental Board  
Dr. Lindsey Yates, University of Colorado School of Dental Medicine  
Matt Crespín, Past President American Dental Hygienists' Association  
Dr. Meaghan Strotman, American Dental Association  
Ryan Edmonson, Arizona State Board of Dental Examiners  
Stephanie Lotridge, Idaho Board of Dentistry  
Dr. Stephen Lepowsky, University of Connecticut School of Dental Medicine  
Dr. Tanya Sue Maestas

A separate drafting team transitioned the recommendations and model from the Technical Assistance Group into a full draft of the Dentist and Dental Hygienist Compact model legislation.

Document Team Group Members:

Ann Lynch, American Dental Hygienists' Association  
Dr. Anthony Ziebert, American Dental Association  
Bill Kellington, Office of Legal Services, Washington Department of Health  
Bobby White, North Carolina Dental Board of Dental Examiners  
Bridgett Anderson, Minnesota Board of Dentistry  
Karen Hart, American Dental Association  
Ken Brody, Page, Wolfberg & Wirth, LLC  
Matt Crespín, American Dental Hygienists' Association  
Dr. Meaghan Strotman, American Dental Association

To feedback on the draft legislation, CSG managed a public comment period during the fall of 2022. This included virtual educational presentations where CSG explained the draft legislation and answered questions. CSG, ADA and ADHA also attended several conferences and convenings to present the compact to interested stakeholder groups. Lastly, CSG hosted a website with the draft legislation, informational materials, and a survey for the public to submit feedback. After gathering responses, CSG reconvened the drafting team and Technical Assistance Group to discuss and make changes, leading to a final draft.



## Fact vs. Fiction

**Fiction: The compact is establishing a national license for dentistry and dental hygiene.**

Fact: The Dentist and Dental Hygienist Compact does not establish a national license. It establishes an optional, additional pathway for practitioners to practice in states where they do not hold a license. The dentist or dental hygienist must apply for a compact privilege in each state where they wish to practice. Compact privilege eligibility is not automatic. States retain control over who they license and scope of practice.

**Fiction: The compact will authorize foreign trained dentists to practice via a compact privilege.**

Fact: Section 4 of the compact states that to be eligible for a compact privilege a dentist must have graduated from a CODA accredited pre-doctoral dental education program. Earning a post-doctoral specialty degree or completing a residency program at a CODA accredited institution does not meet this requirement.

**Fiction: The compact commission will be approving alternative forms of dentistry and dental hygiene education.**

Fact: Section 3 of the compact says that states must accept for licensure that dentists and dental hygienists have graduated from programs accredited by CODA or an accrediting agency approved by the United State Department of Education for the accreditation of dental and dental hygiene education programs.

This does not authorize the commission to approve alternative forms of education such as apprenticeships or foreign training. Allowing for the designation of another accrediting body as approved education for the purposes of issuing compact privileges, protects the compact against becoming obsolete should CODA no longer be the prevailing accrediting body of dental and dental hygiene education programs.

**Fiction: The compact commission is a third-party non-government organization run by CSG and ADA.**

Fact: As established in section 7 of the compact, the commission is the governing body made up of the participating states who have joined the compact. This is a supra-state, sub-federal government entity that serves as an instrumentality of the collective member states. The commission's delegates will be representatives from each state's licensing board. CSG, ADA, nor any outside organization have any role on the commission.

**Fiction: My state is delegating regulatory authority over to the commission.**

Fact: States have full authority over their own licensing laws and how they license dentists and dental hygienists. By joining the compact, states agree to accept dentists and dental hygienists who are licensed in other compact states and have received a privilege to practice in their state under the compact. States continue to determine licensing requirements and scope of practice for themselves.

**Fiction: The compact is promoting the DLOSCE.**

Fact: The compact intentionally defines clinical assessment broadly as to encompass all paths to licensure currently allowed in states. To be eligible for the compact, a practitioner must successfully complete a clinical assessment. This includes the DLOSCE but also could be satisfied by the ADEX exam, PGY1 and other clinical assessment pathways to licensure. To join the compact, a state must accept practitioners from other states that may not have identical clinical assessment requirements.

**Fiction: The Dentist and Dental Hygienist Compact works like the Interstate Medical Licensure Compact (IMLC).**

Fact: The Dentist and Dental Hygienist Compact employs a compact privilege model of multistate practice whereby practitioners obtain compact privileges to work in remote states. Member states are agreeing to mutually recognize each others' licenses so that a practitioner can practice in another member state without needing a license there.

The IMLC employs an expedited licensure model of multistate practice whereby the compact commission is getting the practitioner licensed in every state where they want to practice in an expedited manner.

The two models differ significantly and interested parties should avoid assumptions that the Dentist and Dental Hygienist Compact is based on the IMLC.

**Fiction: The compact is a backdoor attempt for the ADA to control licensing.**

Fact: The Department of Defense selected the ADA and ADHA to participate with CSG in the development of the Dentist and Dental Hygienist Compact. The ADA continues to partner with CSG on state enactment of the compact. The ADA has no role on the commission nor any control over the administration or governance of the compact.

**Fiction: Bad actors will be able to use the compact.**

Fact: The compact requires a background check which protects against bad actors entering into the system. Once a licensee is deemed eligible to obtain compact privileges, states can take a disciplinary action against a compact privilege holder just as if that person held a license in the state. If an action is taken, that action is communicated quickly to all the member states via the compact data system and the action then applies across all compact privileges that a practitioner holds. These safeguards protect against a scenario where a bad actor could run from state to state undetected.

**Fiction: We don't need the compact because we have already addressed the military spouse issue.**

Fact: DoD prefers interstate compacts as a long-term solution for spouses. They like the regulatory certainty that a compact provides. The compact covers all licensees, not only military spouses. The compact creates two-way reciprocity. Current endorsement laws might help spouses moving to your state, but they don't provide value for current residents who wish to work in multiple jurisdictions or change residence. Licensees are still needing to re-test in some instances, provide transcripts, wait on the application to be processed. All of that is costly and time out of the workforce.

# DDH Dentist and Dental Hygienist Compact

## Effect and Benefits

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### Effect

There are approximately 200,000 licensed dentists and approximately 215,000 licensed dental hygienists in the United States. Licensees are limited to providing care within state borders. The Dentist and Dental Hygienist Compact seeks to provide licensees with opportunities for multistate practice and increase mobility for individuals who are relocating, improve public safety and promote workforce development by reducing unnecessary licensure burdens.

### *Benefits for Practitioners*

- Facilitates mobility for licensees.
- Expands employment opportunities into new markets.
- Eases the burden of applying for and maintaining multiple licenses.
- Supports relocating military spouses and families.
- Improves continuity of care.

### *Benefits for State Dentistry Licensing Authorities*

- Reduces administrative burden.
- Creates a compact information system that supports the facilitation of licensure and discipline information for dentists and dental hygienists.
- Expands cooperation among state licensure boards on investigations and disputes.
- Allows regulators to retain jurisdiction over licensees practicing in their state.

### *Benefits for the State*

- Promotes workforce development and strengthens labor markets.
- Expands consumer access to highly qualified practitioners.
- Enhances public safety through a shared interstate data system of licensure and disciplinary information, allowing for rapid verification of licensure status and cooperation among states.
- Preserves state sovereignty.