

# COMPACT COMPARISON

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- **Kimber Cobb, RDH, BS**
- **AADB Executive Director**





## Who We Are

The American Association of Dental Boards is a national association that encourages the highest standards of dental education, promotes higher and uniform standards of qualifications for dental practitioners, and advocates uniform methods in the conduct, operation, and working of dental examining boards.

AADB membership is comprised of boards of dentistry, specialty boards, present, and past board members, board administrators and attorneys, and dental educators.

## Our Mission

To serve as a resource by providing a national forum for exchange, development, and dissemination of information to assist dental regulatory boards with their obligation to protect the public.

## Core Values

- Protecting the nation's oral health care consumer.
- Collaboration with organized dentistry, dental education, and dental regulation.
- Meeting the needs of its members.



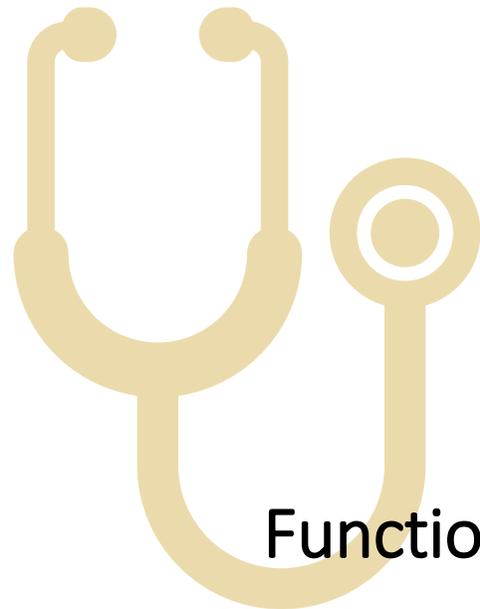
# Dental Licensure Compacts

CSG & AADB Comparison

# Licensure and Compacts

- Licensure is a process that protects the public and upholds the standards of a profession
- Through licensing, state boards ensure that all practitioners have appropriate education, training and competence to practice effectively and abide by recognized standards of professional conduct while serving their patients.
- Licensure compacts serve to make multistate licensure a more efficient process
  - Do not increase the number of practitioners that is fixed each year

# The AADB Compact modeled after Medicine

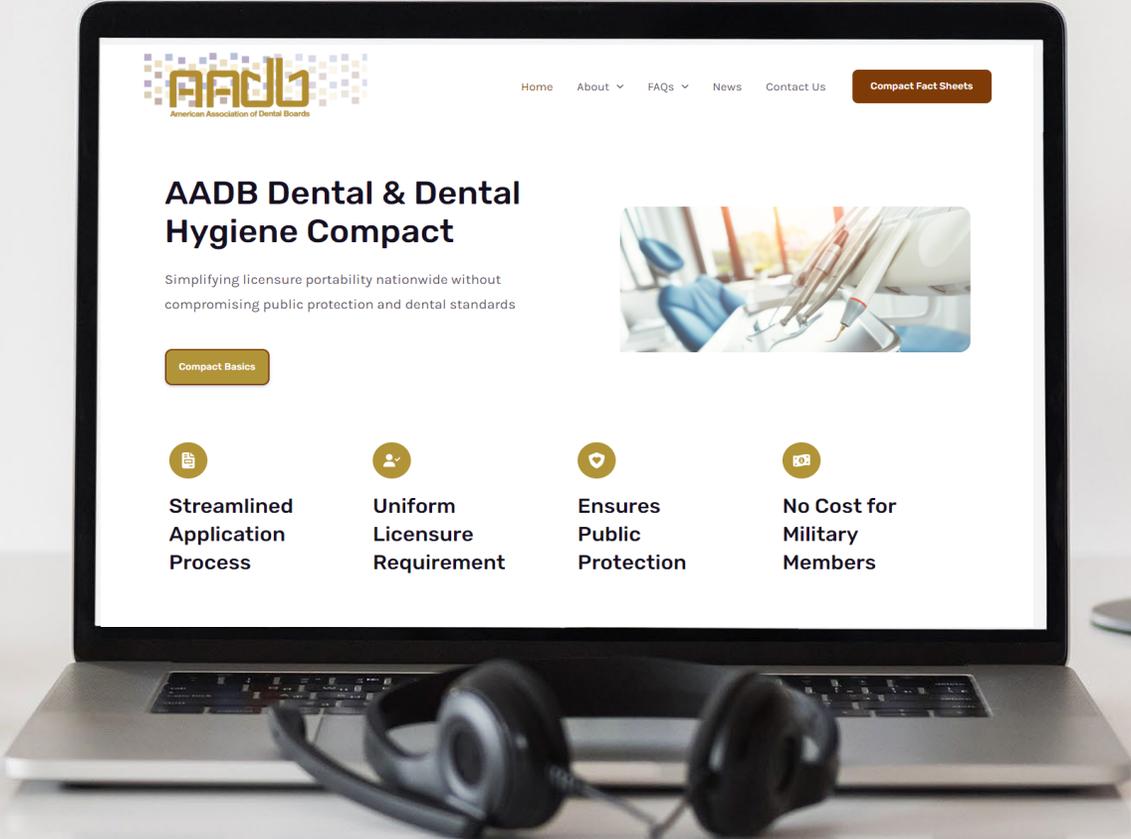


Functional for 15 years, the IMLCC compares to the AADB Compact

# Medical Compact

- Common “original source” verification process for the member states for the 80% of physicians that qualify for the compact so that a physician can get an expedited license given administratively.
- Standards are the highest common denominator
- Otherwise, state medical boards maintain their complete sovereignty with the additional advantage of reporting and possible joint discipline

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# AADB Dental & Dental Hygiene Compact

Simplifying licensure portability nationwide without compromising public protection and dental standards



Compact Basics



Streamlined Application Process



Uniform Licensure Requirement



Ensures Public Protection



No Cost for Military Members

# Administration

- **How does the Compact work?**
- Dentists/Dental Hygienists who are eligible can qualify to practice in multiple states by completing just one application within the Compact, receiving separate licenses from each state in which they intend to practice.
- These licenses are still issued by the individual states – just as they would be using the standard licensing process – but because the application for licensure in these states is routed through the Compact, the overall process of gaining a license is significantly streamlined. Physicians receive their licenses much faster and with fewer burdens.
- The licensing is all state-based. The Commission does not issue a “Compact license” or a nationally recognized dental/dental hygiene license.

# Eligibility

- The primary residence is in the Home State or State of Primary Licensure
  - **In medicine:**
    - At least 25% of the physician's practice of medicine occurs in the State of Primary Licensure (SPL)
    - The physician is employed to practice medicine by a person, business or organization located in the SPL
- The dentist/RDH uses the Home State as his or her state of residence for U.S. Federal Income Tax purposes

# Training and Testing

- Have graduated from a CODA accredited dental school/dental hygiene program
  - **In Medicine:**
    - Have graduated from an accredited medical school, or a school listed in the International Medical Education Directory or its equivalent such as the World Directory of Medical Schools
    - Have successfully completed ACGME- or AOA-accredited graduate medical education
- Passed the ADEX Dental or Dental Hygiene Examination

# Additional Requirements

- No history of disciplinary actions towards license
- No criminal history
- No history of controlled substance actions towards license
- Not currently be under investigation

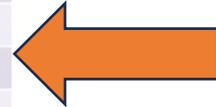
# Provisions

- Coordinated information system for ALL disciplinary sanction information shared with all compact members
- Joint Investigations at the option of the state boards
- Discipline is the purview of each licensing state

# PERSPECTIVE

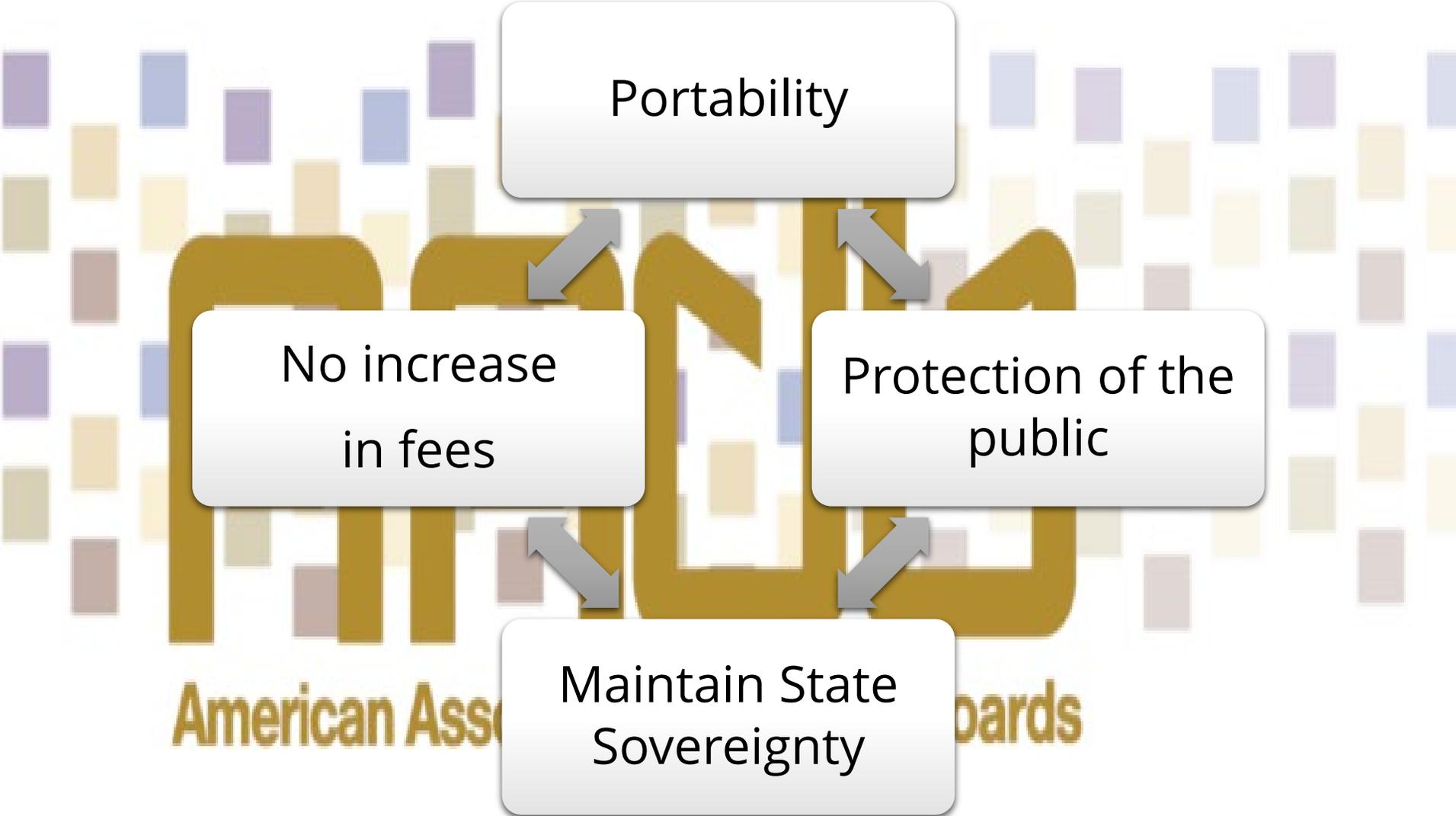
## List of Licensure Compacts Developed by

Compact	Partner
Audiology and Speech Language Pathology Interstate Compact	American Speech Language Hearing Association
Cosmetology Compact	Future of the Beauty Industry Coalition
Counseling Compact	American Counseling Association
Dentist and Dental Hygienist Compact	American Dental Association
EMS Compact	National Association of State EMS Officials
Interstate Massage Compact	Federation of State Massage Therapy Boards
Interstate Medical Licensure Compact	Federation of State Medical Boards
Interstate Teacher Mobility Compact	National Association of State Directors of Teacher Education and Certification
Nurse Licensure Compact	National Counsel of State Boards of Nursing
OT Compact	American Occupational Therapy Association
PA Compact	Federation of State Medical Boards
Psychology Interjurisdictional Compact	Association of State and Provincial Psychology Boards
PT Compact	Federation of State Physical Therapy Boards
Social Work Licensure Compact	Association of Social Work Boards



# Dental Licensure Today

- 50 of 53 licensure jurisdictions have common licensure requirements
- CODA
- Joint Commission National Board
- Recognition of the ADEX Examination which is given in every dental school in the US and taken by 99% of graduates
- 44 states have Licensure by Credentials



# Issues in the



**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 manor.

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

# State of Primary Licensure or Home State



No home state requirement.

No requirement that the individual ever practiced or set foot in the state in which they obtain licensure and through which their compact privilege is obtained



Mirrors medicine in a SPL requirement

# Examinations



206 6. Have passed a National Board Examination of the Joint Commission on National Dental  
207 Examinations or another examination accepted by Commission Rule;

60  
61 D. **“Clinical Assessment”** means examination or process, required for licensure as a Dentist  
62 or Dental Hygienist as applicable, that provides evidence of clinical competence in  
63 dentistry or dental hygiene.

# Examinations

**DDH** Dentist and  
Dental Hygienist Compact

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61 D. **“Clinical Assessment”** means examination or process, required for licensure as a Dentist  
62 or Dental Hygienist as applicable, that provides evidence of clinical competence in  
63 dentistry or dental hygiene.



2. Has successfully passed the American Board of Dental Examiners, (ADEX) licensure exam; and
3. Has successfully passed the written national dental board exam administered by the Joint Commission on National Dental Examinations; and

# Accreditation



7. For a Dentist, have graduated from a predoctoral dental education program accredited by the Commission on Dental Accreditation, or another accrediting agency recognized by the United States Department of Education for the accreditation of dentistry and dental hygiene education programs, leading to the Doctor of Dental Surgery (D.D.S.) or Doctor of Dental Medicine (D.M.D.) degree;

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1. Has successfully graduated from a CODA approved dental school; a

# Criminal and Discipline Issues



- If a member state grants a license to a felon, (some states cannot consider felonies outside the practice of dentistry or not at all) a state cannot refuse licensure upon review they **must** grant a compact privilege
- If a dentist or dental hygienist has had multiple discipline issues that have encumbered their license, but it is not currently encumbered or subject to an alternative sanction, a member state must allow a compact privilege.



- Because the DDS or RDH holds a license there is no change from the current requirements in each state

# Continuing Education



- Licensee complies with the original licensing state's CE requirements, in which they never had to practice or ever been in
  - Is not bound by the compact state's CE requirements
  - Regular licensees in a state may have to adhere to more significant CE requirements than compact licensees
- not a uniform system
- As a licensee of the state all must adhere to the same CE requirements on each state that they are licensed.

# Representation



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4. The Commission may recommend to a State Licensing Authority or Authorities, as applicable, removal or suspension of an individual as the State's Commissioner.

# Uniform Standards



R. DENTIST – means any person who:

1. Has successfully graduated from a CODA approved dental school; and
2. Has successfully passed the American Board of Dental Examiners, (ADEX) licensure exam; and
3. Has successfully passed the written national dental board exam administered by the Joint Commission on National Dental Examinations; and
4. Possesses a full and unrestricted dental license issued by a Member State Board of the compact; and
5. Has never been convicted, received adjudication, deferred adjudication, community supervision or deferred disposition for any offense by a court of appropriate jurisdiction; and
6. Has never been a subject of discipline by a board, through any adverse action, order or other restriction of the licensee by the board with the exception of failure to pay fees or failure to complete continuing education; and
7. Has never had a state or federal drug registration, permit or license, restricted, suspended or revoked by the United States Drug Enforcement Administration or any State Board that oversees scheduled drug registrations; and
8. Is not currently under active investigation by a licensing agency or law enforcement authority in any state, federal or foreign jurisdiction.

# Enforcement



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## 861 J. Enforcement

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863 1. The Commission, in the reasonable exercise of its discretion, shall enforce the provisions  
864 of this Compact and the Commission's Rules.

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866 2. By majority vote, the Commission may initiate legal action against a Participating State

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in default in the United States District Court for the District of Columbia or the federal  
868 district where the Commission has its principal offices to enforce compliance with the  
869 provisions of the Compact and its promulgated Rules. The relief sought may include both

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injunctive relief and damages. In the event judicial enforcement is necessary, the  
871 prevailing party shall be awarded all costs of such litigation, including reasonable

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attorney's fees. The remedies herein shall not be the exclusive remedies of the

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Commission. The Commission may pursue any other remedies available under federal or

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# Enforcement

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## Section 12. OVERSIGHT OF AADB DENTAL & DENTAL HYGIENE COMPACT

- A. The executive, legislative and judicial branches of state government in each member state shall enforce the Compact and shall take all actions necessary and appropriate to effectuate the Compact's purposes and intent. The provisions of the Compact and the rules promulgated hereunder shall have standing as statutory law but shall not override existing state authority to regulate the practice of dentistry.
- B. All courts may take judicial notice of the Compact and the rules in any judicial or administrative proceeding in a member state pertaining to the subject matter of the Compact which may affect the powers, responsibilities or actions of the AADB Compact Commission.
- C. The AADB Compact Commission shall be entitled to receive all service of process in any such proceeding, and shall have standing to intervene in the proceeding for all purposes. Failure to provide service of process to the AADB Compact Commission shall render a judgment or order void as to the AADB Compact Commission, the Compact or promulgated rules.

# Compact Privilege vs Compact License



Provides for a compact privilege to practice in a remote state without that state issuing a license. Effectively creating a national licensure for the member states using the lowest common denominator licensure standards.



Provides for an expedited license issued in each state the dentist wishes to practice so that the state has jurisdiction and control over every practicing dentist in that state.

# DDH Dentist and Dental Hygienist Compact Issue Summary

- A new unelected government agency that can function as a quasi-legislative body that can promulgate rules with the force of law on member states by a simple majority
- Do not need a license in each member state you wish to practice
- No uniform examination standard, any and everything, in fact no independent examination requirement at all
- Unknown fiscal impact

- Enforceability by judicial suits against member states in DC
- Discipline issues too numerous to detail
- Does not require a State of Primary Licensure
  - A DDS or RDH practicing under a compact privilege does not have to fulfill the CE requirements of any state other than the licensing state
- CSG denied boards opportunities to meaningfully participate

# Advantages



# Advantages

- AADB provides for rapid portability in member compact states
- State sovereignty is preserved for the state dental associations and dental boards
- Uniform licensure standards
- No legislative authority over participating states
- No fees to dental boards or licensees that do not utilize the compact
- Focuses exclusively on promised goals
- Provides a dental licensure compact all states can embrace

# Supporting Dental Hygiene

- The AADB Compact also maintains the current accreditation and discipline requirements for dental hygiene licensure
  - FL DH Licensure
  - AL ADHP Program

# Supporting Dental Hygiene: Representation

**DDH** Dentist and  
Dental Hygienist Compact

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333 4. The Commission may recommend to a State Licensing Authority or Authorities, as  
334 applicable, removal or suspension of an individual as the State's Commissioner.  
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194           b) Each state Member State Dental Board shall have two (2) voting commission members that shall serve  
195 as commissioners and have one (1) vote each, cumulatively making the AADB Compact Commission.  
196 Member States with separate Dental and Dental Hygiene State Dental Boards shall appoint one (1)  
197 commissioner from each Board. One shall be a current State Dental Board member. Commissioners  
198 may not delegate votes or proxies, however, if a commissioner is unable to attend, the Member State  
199 may substitute a delegate that meets the same requirements.

# QUESTIONS??

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## AADB Dental & Dental Hygiene Compact

Simplifying licensure portability nationwide without compromising public protection and dental standards



[Compact Basics](#)



**Streamlined  
Application  
Process**



**Uniform  
Licensure  
Requirement**



**Ensures  
Public  
Protection**



**No Cost for  
Military  
Members**



August 31, 2023

To: State Dental Boards

From: American Association of Dental Boards

By now, State Dental Boards and State Dental Associations are aware that there are two Dental and Dental Hygiene Compacts – the CSG Compact and the AADB Compact. Both Compacts have license portability as their purpose; the difference is how they’re structured to provide portability within the dental profession!

Regardless of rhetoric, public relations campaigning, or special gatherings; the AADB requests that stakeholders “just read the two Compacts”! Then we ask you to consider the following questions:

- Which has the simplest, most straightforward process to license portability?
- Which has no costs to States nor State Dental Boards?
- Which Compact copies the exact framework of medical Interstate Licensure Compact developed by the Federation of State Medical Boards that’s been successful for more than 15 years?
- Which Compact requires a “true” hands-skills testing and only a CODA accredited dental school requirements?
- Which Compact will not require changes in Jurisdictional Statutes in order to accommodate existing Statutes or grant a Compact Commission the ability to supersede State sovereignty?
- Which Compact allows the State Board that receives a complaint to act directly within it’s own State without going to a Compact Commission?
- Which Compact already has an existing ‘Clearinghouse’ and ‘repository’ system plus interstate State Boards network for handling all licensing information, data, and secured documents?
- Which Compact guarantees military AND spouses portability including an additional year without fees when separating from the military?

State Dental Boards/AADB supports portability that is straightforward, easy to access, and ensures that in your state, a Dentist or Dental Hygienist with an AADB Compact License Privilege is in good standing and fully qualified. The mission of Dental Boards is to protect the public. The AADB ensures this in the AADB Compact language.

We’ve included some highlights of note within both compact language versions distributed. We’ll be forwarding a side by side comparison shortly. Thank you for your dedication and diligence on behalf of our profession!

AMERICAN ASSOCIATION OF DENTAL BOARDS  
DENTAL AND DENTAL HYGIENE LICENSURE COMPACT

A licensure compact could address many of the needs of the dental healthcare community. With two pieces of legislation to consider, which meets

# YOUR needs?

	AADB Compact	CSG Compact
<b>DO YOU RECEIVE A STATE DENTAL LICENSE?</b>	YES (EXPEDITED LICENSE)	NO (PRIVILEGE FROM COMPACT COMMISSION)
<b>WHO ISSUES YOUR LICENSE OR PRIVILEGE?</b>	PARTICIPATING STATE BOARD	COMPACT COMMISSION
<b>WHO HAS DIRECT AUTHORITY ON YOUR PRACTICE?</b>	STATE DENTAL BOARD	COMPACT COMMISSION
<b>IS HANDS-SKILL TESTING BY AN INDEPENDENT THIRD-PARTY MANDATORY?</b>	YES	NO
<b>IS GRADUATION FROM A C.O.D.A. ACCREDITED DENTAL SCHOOL MANDATORY</b>	YES	NO
<b>WHO HAS DIRECT JURISDICTION OVER COMPLIANCE, LEGAL ACTIONS, ORDERS, ETC. IN YOUR STATE?</b>	STATE DENTAL BOARD	COMPACT COMMISSION (NO REAL STATE LICENSE, NO JURISDICTION OVER NON-LICENSEES)
<b>ARE THERE FISCAL IMPACTS TO STATE AND DENTAL BOARD?</b>	NO	YES, UNKNOWN YEARLY CHARGES
<b>DO STATUTES NEED TO BE CHANGED OR SUPERSEDED?</b>	NO	YES (EG. IF STATUTES REQUIRE HANDS-SKILL EXAM OR C.O.D.A. DENTAL OR DENTAL HYGIENE SCHOOL – COMPACT COMMISSION RULES APPLY)
<b>IS THERE A TWO-TIER LICENSING REQUIREMENT?</b>	NO	YES, (PRIVILEGE ONLY REQUIRED TO FOLLOW HOME STATE REQUIREMENTS)
<b>COMPACT MODEL?</b>	INTERSTATE MEDICAL COMPACT	COSMETOLOGY COMPACT

**Ask Us** how to update your planned legislation to better protect patients, your state and your board.