



February 12, 2025

Chair Nosse, Vice Chairs Javadi and Nelson, and Committee Members
House Committee on Behavioral and Health Care
2025 Oregon Legislative Session

I am writing to you on behalf of the Oregon Dental Hygienists' Association (ODHA) to express **our strong support for HB 2676** that if passed will enact the **Dentist and Dental Hygienist (DDH) Compact** in Oregon.

Challenge of State-by-State Licensure

Currently, dentists and dental hygienists must obtain and maintain a license for each state where they practice. State-by-state licensure creates barriers in terms of both time and money that make it difficult for these licensed professionals to practice in more than one state or to relocate to another state. Because Oregon shares a border with Washington, many dentists and dental hygienists must obtain and maintain a license in each state if they want to practice in both states. Military families that include licensed dentists or dental hygienists face the same licensing barriers when they relocate to Oregon.

License Portability

The DDH Compact will reduce these barriers and facilitate license portability for dentists and dental hygienists by creating a system that allows them to obtain and maintain a license in just one state (qualifying license), and then be able to apply for compact privilege to practice in other member states within the compact without the need to obtain and maintain a license for each of those states. They may begin legally working in the new state when eligibility is verified, jurisprudence requirements are met and all fees are paid. These dentists and dental hygienists may still choose to obtain and maintain additional licenses, but this would likely take more time and cost more money than obtaining compact privilege.

DDH Compact Development

The DDH Compact model legislation was developed by the Council of State Governments (CSG) and stakeholder groups that include the American Dental Association (ADA), the American Dental Hygienists' Association (ADHA), state dental licensing boards and dental schools. A draft of this model legislation was provided to stakeholders for their review and feedback before it was finalized. This process began in fall 2021 and ended in January 2023 when the DDH Compact model legislation was released. The DDH Compact legislation has already been adopted by 10 states and this legislation is currently pending in 15 additional states.

DDH Compact Commission

The DDH Compact legislation has a provision for establishing a Commission that will create bylaws, policies and administrative rules to implement the compact. The Commission is comprised of one delegate from each member state's licensing authority. The Commission is not a dental board, it cannot affect member state licensing requirements, and it cannot take action against a license. The Commission has already held two meetings. These meetings are open to the public so the Oregon Board of Dentistry has the opportunity to participate in these meetings.

Implementation & Budget Concerns

We are aware that the Executive Director of the Oregon Board of Dentistry has expressed concerns about how the DDH Compact will be implemented in Oregon and how it will affect the Board's budget. The DDH Compact Commission includes representatives from each participating state licensing board who have the same concerns and are working together to address these concerns. It may be too early to tell how the compact will impact budgets, but the state licensing boards will determine the fees for compact privilege (that should be less than their licensure fees), and processing compact privilege applications should require less staff time because the applicants will already have a qualifying license from a member state and the participating states will be using a shared compact data system.

State Sovereignty

The DDH Compact preserves the authority of each member state to regulate the dentists and dental hygienists in their state. States will continue to have full authority over their own licensing laws and how they license dentists and dental hygienists. States will continue to determine their own licensing requirements and scope of practice. Dentists and dental hygienists who use this compact must obey the law and rules for the state in which they are practicing and adhere to that state's scope of practice. The member state's regulatory board will issue compact privileges so they will know who is practicing in their state. The member states will use a shared data system to track dentists and dental hygienists who are practicing in their state.

Jurisprudence Exams & Continuing Education

Dentists and dental hygienists applying for compact privilege in a another member state are required to complete the jurisprudence exam for that state and they are required to practice within the scope of practice for that state. Dentists and dental hygienists are required to complete continuing education requirements for the state where they hold their qualifying license; they are not required to complete continuing education requirements for states where they hold compact privilege.

“Bad Actors”

Member states must require a criminal background check for licensure. States can take a disciplinary action against a compact privilege holder just as if that person held a license in that 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 person holds.

Oregon Dental Hygienists' Association

The ODHA represents dental hygienists and the dental hygiene profession in Oregon, and is a state constituent of the American Dental Hygienists' Association (ADHA) which was one of the stakeholder groups that developed the DDH Compact model legislation. The ODHA is committed to improving the oral health of the public through advocacy, education and patient-centered oral health care.

We strongly urge you to move HB 2676 to the House with a do pass recommendation.

Sincerely,

A handwritten signature in black ink that reads "Lisa J. Rowley". The signature is written in a cursive, flowing style.

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