



February 16, 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 **support HB 2676** and to address issues raised by the American Association of Dental Boards (AADB).

- **Fails to mandate full reporting of disciplinary issues and criminal history, limiting your state's ability to protect patients effectively.**  
The DDH Compact legislation requires participating states to fully implement a criminal background check requirement and to notify the DDH Compact Commission of any adverse actions regarding a licensee or license applicant. Compact privilege holders must also report adverse actions to the Commission. If a participating state has a jurisprudence exam requirement, licensee applying for compact privilege must complete this requirement. The Commission will provide for the development, maintenance, operation, and utilization of a coordinated database and reporting system containing licensure, adverse action, and the presence of significant investigative information on all Licensees and applicants for a license in participating states.
- **Does not give a state dental board authority over persons practicing under a compact privilege.**  
The DDH Compact legislation extends the authority of the participating state to regulate dentists and dental hygienists who practice in the state through a compact privilege and requires dentists and dental hygienists who practice with a compact privilege to practice within the scope of practice for that state.
- **Undermines state authority by giving an unelected commission quasi-legislative powers in your state.**  
The DDH Compact Commission is a national administrative body comprised of one delegate from each member state's licensing authority. The Commission does not have quasi-legislative powers in the participating states.

- **Creates an unelected taxing authority with the power to levy annual assessments on participating states, resulting in unpredictable fiscal impacts.**  
In order to cover the cost of the operations and activities of the Commission and its staff, the Commission may levy on and collect an annual assessment from each participating state and levy on and collect an assessment from licensees who apply for compact privilege.
- **Weakens public safety by potentially allowing unqualified dental professionals to practice across state lines.**  
All dentists and dental hygienists who participate in the DDH Compact will need to have graduated from an education program accredited by the Commission on Dental Accreditation, successfully complete a national board examination, successfully complete a clinical assessment, complete a criminal background check and complete continuing education required by their qualifying state. These are the requirements for licensure in most states.
- **Could lead to increased malpractice claims due to weaker standards, as seen in states that have dropped hand-skills examination requirements**  
Oregon requires a clinical board examination for dentists and dental hygienists, but does not require a hands-on skills examination. There is no evidence that eliminating hand-skill examinations in dentistry leads to increased malpractice claims.
- **May exacerbate workforce shortages in your state by facilitating an exodus of dental professionals to more lucrative markets.**
- **May benefit large Dental Support Organizations (DSOs) at the expense of local dental practices and patient safety.**  
There are many reasons for dentists and dental hygienists moving between states. There is no evidence to support claims that the DDH Compact may exacerbate workforce shortages or benefit DSOs over private dental practices.

### **Development of DDH Compact**

The DDH Compact legislation was developed by the National Council for Interstate Compacts (NCIC) which exists within the CSG. The NCIC is currently advising the drafting, development and implementation of professional licensure compacts for audiologists, counselors, dieticians, physical therapists, occupational therapist and other health care professionals. CSG has drafted all of the existing licensure compacts including the medical and nursing compacts.

In 2021 the AADB was invited to participate in development of the DDH Compact legislation but declined to participate in the compact development process stating at the time, "Although we are grateful for your offer to collaborate, we choose to make our own pathway." The AADB also did not provide any feedback when the DDH Compact draft legislation was released for public comment in fall 2022. The AADB did not express their concerns until the DDH Compact was enacted by several states.

**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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