

**Dentist and Dental Hygienist Compact Commission Rules
Document**

Title of Rule: Rule on Clinical Assessment

Vote on Rule: This rule will be discussed and voted on at the Dentist and Dental Hygienist Compact Commission meeting on November 10th at 1pm ET.

Public comment: Interested persons may electronically request to comment on the proposed rule by filling out this [form](#). Public comments on the proposed rule must be submitted 48 hours before the meeting.

Effective: Upon passage

Reason for Rule: To further define Clinical Assessment pursuant to Article 2, Article 3, and Article 4 of the Dentist and Dental Hygienist Compact.

History for Rule: January 21, 2025: Rule first proposed at DDH Compact Commission Meeting

Chapter 2: Rule on Clinical Assessment

Authority: Section 2: Definitions

Section 3: State Participation in the Compact Section 4:

Compact Privilege

Section 9: Rulemaking

1.0 Purpose:

Pursuant to Section 9, the Dentist and Dental Hygienist Compact Commission shall promulgate reasonable and lawful uniform rules to facilitate and coordinate implementation and administration of the Dentist

and Dental Hygienist Compact. This rule will become effective upon passage by the Dentist and Dental Hygienist Compact Commission as provided in Article 9.

1.1 Clinical Assessment:

A. As set forth in Section 2-G, satisfaction of the Clinical Assessment requirement shall not be interpreted to include pathways that provide licensure solely upon graduation from an accredited institution.

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STATEMENT OF NEED AND REASONABLENESS

Introduction

The topic of clinical assessment and the proposed rule language has been discussed by the Full Compact Commission and by the Rules Committee of the Compact Commission on several occasions. There was one state example that was given to members regarding licensure in the state upon graduation from dental school. In this case, there was no specific clinical assessment required beyond course competencies in the dental school program. The members discussed that licensure upon graduation should not, when taken alone, meet the definition of clinical assessment due to it being duplicative of the specific educational process in the state referenced, rather than a separate “examination or process” that “provides evidence of clinical competence in dentistry or dental hygiene” as required by Section 2.G. of the Compact’s model language.

Statement of General Need

The proposed rule is needed to further clarify the definition of Clinical Assessment as set forth in Section 2.G of the Compact’s model language. It is necessary to provide clarity into what constitutes a Clinical Assessment process so that licensees and Member States may have clarity in the implementation of the Compact in determining eligibility for the issuance of Compact Privileges.

Scope of Proposed Rule

The following section is affected by the proposed Rule:

- **Chapter 2:** Rule on Clinical Assessment

As set forth in Section 2-G. satisfaction of the Clinical Assessment requirement shall not be interpreted to include pathways that provide licensure solely upon graduation from an accredited institution.

Authority

The DDH Compact Commission’s statutory authority to adopt the rules is stated in Compact statutory language.

Authority: Section 2:Definitions

Section 3: State Participation in the Compact Section 4:

Compact Privilege

Section 9: Rulemaking

Public Participation and Stakeholder Involvement

The topic of clinical assessment generally and the proposed rule topic described herein has been discussed by the Full Compact Commission and by the Rules Committee of the Compact Commission on several occasions. The proposed language has also been made available to interested parties, as an inclusion in meeting materials. Meetings are open to the public.

The Full Commission will discuss this proposed rule on November 10th, 2025.

Reasonableness of the Rule

General Reasonableness

The proposed Clinical Assessment Rule is reasonable because it establishes a clear standard for application of the definition of Clinical Assessment in a manner that ensures consistency among Member States and compliance with current best practice.

Regulatory Analysis

Impacted Parties Affected

The impacted parties would be graduates in states that allow licensure upon graduation from a dental or dental hygiene program. The rule does not impose excessive burden on providers, as it aligns with the remainder of the Model Compact language, a good faith interpretation of legislative intent, and standard clinical assessment processes already in place in most states.

Department/Agency Costs

There are no probable costs to the DDH Commissions or state agencies related to the implementation and enforcement of the proposed rule.

Less Costly or Intrusive Methods

There are not any identified less costly methods or less intrusive methods for achieving the purpose of the proposed rule.

Alternative Methods

There are not any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the DDH Commission.

Costs to Comply

There are no probable costs of complying with the proposed rule.

Notice Plan

Required Notice

Notice of Proposed Rulemaking will be given in accordance with Section 9.G. of the Compact's model language and Rule 1 :Rule on Rulemaking.

Additional Notice

In addition to the required notice referenced above, the DDH Commission will make the Dual Notice and Notice of Intent to Adopt Rules, SONAR, and proposed rule available on the DDH Compact webpage section created for this rulemaking.

Authors, Witnesses, and Exhibits

Authors

The primary authors of this SONAR are members of DDH Rules Committee.

Witnesses

If these rules go to a public hearing, the Commission anticipates having the following witnesses testify in support of the need for and reasonableness of the rules:

- DDH Commissioner Corey Schaal

Conclusion

In this SONAR, the DDH Commission has established the need for and the reasonableness of the proposed creation of this rule.

Based on the forgoing, the proposed creation of the rule is both needed and reasonable.

Carey C. School

Commissioner
DDH Commission

10/8/2025

Date