

### 1.2 Clinical Assessment

As set forth in Section 2-D, satisfaction of the Clinical Assessment requirement shall be interpreted to include pathways that provide licensure based on the successful completion of a psychomotor performance examination that involves hand skills, along with successful completion of an objective structured clinical examination.

Rationale:

By defining this way, it would include all current exam pathways for licensure.

ADEX- psychomotor and offers an OSCE component

CRDTS-SRTA- psychomotor and offers an OSCE component

DLOSCE- satisfies the OSCE component of the clinical assessment requirement

## STATEMENT OF NEED AND REASONABLENESS

### Introduction

The topic of clinical assessment and the proposed rule language has been discussed by the Full Compact Commission, Executive Committee and by the Rules Committee of the Compact Commission on several occasions. The Rules Committee discussed that by providing this definition, it includes all current examination pathways for licensure. Examples provided:

ADEX- psychomotor and offers an OSCE component

CRDTS-SRTA- psychomotor and offers an OSCE component.

DLOSCE and DHOSCE satisfies the OSCE component of the clinical assessment requirement.

The definition, by not naming specific examinations, allows for flexibility in the future.

### Statement of General Need

The proposed rule is needed to further clarify the definition of Clinical Assessment as set forth in Section 2.D 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-D, satisfaction of the Clinical Assessment requirement shall be interpreted to include pathways that provide licensure based on the successful completion of a psychomotor performance examination that involves hand skills, along with successful completion of an objective structured clinical examination.

### 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, Executive Committee, 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 discussed the proposed rule on January 12<sup>th</sup>, 2026.

## **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.