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February 17, 2024

The Honorable Chair and Honorable Members of the  
House and Government Operations Committee  
Maryland State Capitol  
240 Taylor House Office Building  
241 Taylor House Office Building  
Annapolis, Maryland 21401

Re: Informational Testimony/ Maryland HB 534 Regarding the American Association of Dental Boards (AADB) Interstate Dental and Dental Hygiene Licensure Compacts (IDDLIC)

Dear Chair and Honorable Members of the House and Government Operations Committee:

My name is Richael Cobler, and I am the Executive Director of Central Regional Dental Testing Service, Inc. (CRDTS), a dental and dental hygiene testing agency which develops and administers clinical licensure examinations as a pathway toward licensure across the nation.

As a testing agency that has provided examinations for more than 50 years, CRDTS requests your careful consideration of the following concerns with the AADB IDDLIC being presented through HB 534. This compact is yet another attempt by the conglomerate involved in the drafting of the compact to do away with competition and create a monopoly.

#### **HB 534**

The AADB IDDLIC being introduced by lobbyists for the American Association of Dental Boards (AADB) claims to promote portability and increase access to dental health care. Written by employees of the very agency that provides the only acceptable examination through this compact with the legal assistance of attorneys who act on behalf of the CDCA/WREB/CITA test administration organization, now known as CWC, and/or ADEX (the exam development agency and only acceptable examination under this compact), the IDDLIC does the opposite of promote portability by restricting the acceptable clinical licensure examinations to one exam when there are other nationally recognized and accepted examinations developed by CRDTS.

Furthermore, there are no studies or data that we are aware of indicating that a dental and dental hygiene compact will increase access to care. In fact, a compact cannot produce more providers, rather it will likely enable providers to move from one area where there are shortages to a more geographically favorable location.

If portability and increased access to care was the goal of this compact, all valid and nationally accepted dental and dental hygiene examinations would be acceptable as part of the definitions within the compact language, allowing all licensed dental and dental hygiene professionals to participate in the compact. As written, ADEX is the only acceptable examination unless a participant:

***"Has been in practice five (5) years or more and has successfully passed a Regional Board Examination or equivalent state-administered psychomotor licensure examination prior to January 1, 2024" (House Bill 534, Pg 5, lines 8-11 and Pg 6, lines 5-7)***

Additionally, there are concerns regarding the relationships between the organizations promoting the AADB Compact. ADEX is “a test development agency, serving its member dental boards in developing valid and reliable initial licensure examinations for dentistry and dental hygiene professionals” ([adexexams.org/Home](https://adexexams.org/Home), accessed 2/17/2025). However, the ADEX exam is given exclusively by the CWC. Further, the AADB now shares employees with the CWC and at the 2024 Annual Meeting of the AADB, the then president publicly thanked CWC for their generous contribution to the AADB making the annual meeting in Hollywood, CA possible and so nice.

Besides these obvious conflicts of interest among the AADB, the CWC and ADEX, the exclusion of all valid and nationally acceptable clinical assessments other than the ADEX exam is an arbitrary and capricious decision on behalf of the AADB and requiring the ADEX exam after 2024 in order to participate in the compact is nothing more than an attempt to monopolize the business of developing and administering dental and dental licensure examinations. Only a handful of state dental boards (the stakeholders of the AADB) were consulted during the drafting of the IDHLC by the AADB’s own admission. The AADB’s justification that ADEX is accepted more widely has nothing to do with the quality of the examination. In fact, recently when compared side-by-side by numerous state dental board members and faculty members independently, the CRDTS examination was determined to be more current and equitable.

This is because the CRDTS exams are strictly developed based on current data and analysis provided by a third-party psychometrician through a nationwide occupational survey (Occupational Analysis) providing information regarding the most current and most frequently performed procedures in dental practice. CRDTS is diligent in its efforts to ensure the most current and most important components of dentistry are being assessed accurately through our examinations.

To my understanding both the ADEX and the CRDTS examinations meet the requirements of all state dental boards accepting clinical licensure examinations as a pathway toward licensure, thus both should be acceptable under any dental and dental hygiene compact.

CRDTS’ Membership consists of representatives from 23 of the 48 states that accept clinical licensure examinations as a pathway toward licensure. CRDTS is accepted in 80% of the nation and the states that do not accept CRDTS have not provided a sound reason for non-acceptance which we also believe to be arbitrary and capricious.

CRDTS has been developing clinical licensure examinations far longer than ADEX has been in existence. Furthermore, CRDTS’ leadership and examiners were very involved in the writing of the ADEX examination. In fact, the first ADEX examination was administered by CRDTS in Hawaii in 2005 ([adexexams.org/FAQ/When and How was ADEX created?](https://adexexams.org/FAQ/When_and_How_was_ADEX_created?); accessed 2/17/2025).

In summary, the IDHLC as introduced in HB 534 does not serve the state of Maryland as it will encourage a monopoly and put many current and future licensees at a disadvantage for compact participation. Thus, taking the choice of examinations away from candidates and schools is an unjust decision and one we hope this committee will not approve. A monopoly is just bad for all involved.

On behalf of CRDTS and our Member States, we urge the Committee to consider the information provided and vote no to HB 534.

Respectfully Submitted,

*Richael L. Cobler*

Richael L. Cobler  
CRDTS Executive Director