

The Florida Senate
BILL ANALYSIS AND FISCAL IMPACT STATEMENT

(This document is based on the provisions contained in the legislation as of the latest date listed below.)

Prepared By: The Professional Staff of the Committee on Health Policy

BILL: SB 154

INTRODUCER: Senator Harrell

SUBJECT: Mobile Opportunity by Interstate Licensure Endorsement Act

DATE: November 17, 2025

REVISED: _____

	ANALYST	STAFF DIRECTOR	REFERENCE	ACTION
1.	Smith	Brown	HP	Favorable
2.			AHS	
3.			RC	

I. Summary:

SB 154 provides that out-of-state dentists and dental hygienists are ineligible for licensure under Florida's Mobile Opportunity by Interstate Licensure Endorsement (MOBILE) Act if they did not graduate from a school accredited by the Commission on Dental Accreditation (CODA) of the American Dental Association.

The bill provides an effective date of July 1, 2026.

II. Present Situation:

Regulation of Dental Services

The Department of Health (DOH) is the state's primary public health agency, responsible for safeguarding the health and well-being of residents and visitors. The Division of Medical Quality Assurance (MQA) within the DOH has general regulatory authority over health care practitioners. The MQA works in conjunction with 22 regulatory boards and four councils to license and regulate over 1.5 million health care practitioners.¹ Professions are generally regulated by individual practice acts and by ch. 456, F.S., which provides regulatory and licensure authority for the MQA.

The Board of Dentistry (Board) is responsible for adopting rules to implement provisions of chapter 466, Florida Statutes, regulating the practice of dentists, dental hygienists, and dental assistants.² The Board consists of 11 members including seven licensed dentists actively practicing in the state, two licensed dental hygienists actively practicing in the state, and two

¹ Florida Department of Health, Division of Medical Quality Assurance, FY 2024–25 Annual Report and Long-Range Plan 24 (Oct. 31, 2025), <https://www.floridahealth.gov/licensing-and-regulation/reports-and-publications/documents/2025.10.31.FY24-25MQAAR-FINAL1.pdf> (last visited Nov. 12, 2025).

² Section 466.004(1), F.S.

laypersons.³ Members of the Board are appointed by the Governor and subject to confirmation by the Senate.⁴ Four seats are currently vacant.⁵ The Council on Dental Hygiene and Council on Dental Assisting advise the Board on rules and policies relating to their respective professions.⁶

Dentists and dental hygienists must receive specified education and training to become licensed and practice in their respective professions. Dental assistants may provide a narrow scope of services as authorized and supervised by a licensed dentist;⁷ however, dental assisting is an unlicensed profession. Two of the most prominent licensure pathways are licensure by endorsement and licensure by examination.

The DOH reports that 14,960 Florida licensed dentists and 16,899 dental hygienists were actively practicing in-state during state fiscal year 2024-25.⁸ During that time frame, the DOH issued initial licenses for 1,380 dentists and 1,767 dental hygienists;⁹ 291 dentists and 66 dental hygienists were licensed through the MOBILE Act.¹⁰

Licensure by Endorsement: The MOBILE Act

The Mobile Opportunity by Interstate Licensure Endorsement (MOBILE) Act, codified in s. 456.0145, Florida Statutes, is a pathway for the expedited licensure of health care professionals who are licensed in good standing in the U.S. outside of the state of Florida. The Act was designed to facilitate workforce mobility and expand access to care by allowing eligible out-of-state practitioners to obtain licensure by endorsement in Florida without undergoing traditional initial licensure requirements, such as additional examinations or coursework.

To obtain Florida licensure by endorsement under the MOBILE Act, an applicant must:

- Submit a complete application and any required fees and documents.
- Maintain an active, unencumbered license from another U.S. state, territory, or Washington, D.C., in a profession with a similar scope of practice, as determined by the applicable board or the DOH if there is no board.
- Either have a passing score on a national licensure examination or hold a national certification recognized for the profession. If the profession has no national exam or certification, the applicable board, or the DOH if there is no board, must determine that the issuing jurisdiction's education (and, if applicable, exam/experience/supervision) requirements are substantially similar to Florida's.
- Have actively practiced the profession for at least two years in the four years immediately before applying.
- Attest that the applicant is not currently the subject of a disciplinary proceeding and has had no disciplinary action within the past five years.

³ *Id.*

⁴ *Id.*

⁵ Florida Board of Dentistry, *The Board*, <https://floridasdentistry.gov/the-board/> (last visited Nov. 12, 2025).

⁶ Section 466.004(2), F.S.

⁷ Section 466.024, F.S. Rule 64B5-16.005, F.A.C.

⁸ *Id.* at 24-25.

⁹ *Id.* at 35-36.

¹⁰ *Id.* at 42.

- Meet s. 456.048, F.S., or any profession-specific financial responsibility requirements, if applicable.
- Submit fingerprints for background screening under s. 456.0135, F.S., if required for the profession.

An applicant is ineligible for licensure by endorsement under the MOBILE Act if any of the following apply:

- The applicant has a pending complaint, allegation, or investigation.
- The applicant has been convicted of, or has pled nolo contendere to, any felony or misdemeanor related to the practice of health care.
- The applicant has had a license revoked, suspended, or surrendered in lieu of discipline.
- The applicant has been reported to the National Practitioner Data Bank for conduct that would constitute a violation of Florida law or rule, unless the report has been successfully removed through appeal.

For conduct reported to the National Practitioner Data Bank that would not constitute a violation of Florida law or rule, the applicable board, or the DOH if there is no board, may approve the application, approve with restrictions, approve on probationary status, or deny the application.

Licensure by Examination: Requirements for Dental Professionals

Licensure Requirements for Dentists

A dentist is licensed to examine, diagnose, treat, and care for conditions within the human oral cavity and its adjacent tissues and structures.¹¹ Dentists may delegate certain tasks¹² to dental hygienists and dental assistants, but a patient's "dentist of record" retains primary responsibility for all dental treatment on the patient.¹³

To be licensed as a dentist in Florida, a person must apply to the DOH and meet the following requirements:¹⁴

- Be at least 18 years of age;
- Be a graduate of a dental school accredited by the Commission on Dental Accreditation (CODA) of the American Dental Association (ADA); or, if the applicant graduated from a nonaccredited dental school, present to the Board one of the following criteria:
 - Complete, at an accredited American dental school, a matriculated general dental program which consists of either four years of dental subjects or two years of predental education followed by three years of dental subjects and receive a receive a D.D.S. or D.M.D. from the institution at which the dental school is located; or
 - Complete two consecutive academic years at a full-time, matriculated Commission on Dental Accreditation of the American Dental Association accredited supplemental general dentistry program, which provides didactic and clinical education to the level of an accredited D.D.S. or D.M.D. program.

¹¹ Sections 466.003(2) and 466.003(3), F.S.

¹² Section 466.024, F.S.

¹³ Section 466.018, F.S.

¹⁴ Section 466.006, F.S.; Rule 64B5-2.0146, F.A.C.

- Obtain a passing score on the:
 - American Dental License Examination (ADEX), developed by the American Board of Dental Examiners, Inc.;
 - National Board of Dental Examiners Dental Examination (NBDE), administered by the Joint Commission on National Dental Examinations (JCNDE);¹⁵ and
 - A written examination on Florida laws and rules regulating the practice of dentistry.

Licensure Requirements for Dental Hygienists

A dental hygienist provides education, preventive, and delegated therapeutic dental services under varying levels of supervision by a licensed dentist.¹⁶ To be licensed as a dental hygienist, a person must apply to the DOH and meet the following requirements:¹⁷

- Be 18 years of age or older;
- Be a graduate of an accredited dental hygiene college or school; or for a graduate of a non-accredited dental hygiene college or school submits the following credentials for review by the Board:
 - Transcripts totaling four academic years of postsecondary dental education; and
 - A dental school diploma which is comparable to a D.D.S. or D.M.D.
- Obtain a passing score on the:
 - Dental Hygiene National Board Examination;
 - Dental Hygiene Licensing Examination developed by the American Board of Dental Examiners, Inc., which is graded by a Florida-licensed dentist or dental hygienist employed by the DOH for such purpose; and
 - A written examination on Florida laws and rules regulating the practice of dental hygiene.

Commission on Dental Accreditation (CODA)¹⁸

The Commission on Dental Accreditation (CODA) is the nationally recognized accrediting agency for dental and dental-related education programs in the United States. Established in 1975 and operating under the American Dental Association, CODA is recognized by the U.S. Department of Education as the sole accrediting body for dental education programs.

CODA accredits programs in general dentistry and advanced dental education, as well as allied dental professions, including dental hygiene, dental assisting, and dental laboratory technology. Accreditation by CODA is a voluntary process that assures the public and licensing boards that a program meets nationally accepted standards of quality. Institutions seeking CODA accreditation must demonstrate compliance with discipline-specific standards and are subject to site visits and ongoing evaluation. CODA accredits more than 1,400 programs in the United States.

¹⁵ American Dental Association, Joint Commission on National Dental Examinations, *Upholding Quality Oral Care For All*. Available at <https://jcnde.ada.org/> (last visited Nov. 12, 2025).

¹⁶ Sections 466.003(4), F.S., and 466.003(5), F.S.; Rule 64B5-2.0144, F.A.C.

¹⁷ Section 466.007, F.S.

¹⁸ Commission on Dental Accreditation, *About CODA*, American Dental Association, <https://coda.ada.org/about-coda> (last visited Nov. 12, 2025).

III. Effect of Proposed Changes:

Section 1 of the bill amends s. 456.0145(2)(c), F.S., to revise the list of persons ineligible for licensure by endorsement under the MOBILE Act. The bill adds that an applicant seeking licensure to practice under ch. 466, F.S. (dentistry or dental hygiene) is ineligible for licensure by endorsement if the applicant has not graduated from a dental school or dental hygiene college or school accredited by the American Dental Association Commission on Dental Accreditation (CODA) or a comparable accrediting agency recognized by the United States Department of Education.

In effect, this would ensure that an out-of-state dentist or an out-of-state dental hygienist obtaining licensure by endorsement via the MOBILE Act meets the educational standards required of a dentist obtaining traditional licensure by examination in Florida. Out-of-state dentists and dental hygienists who have graduated from unaccredited schools may seek initial licensure by examination in Florida under the bill through existing pathways that generally require the Board to assess the applicant's proof of additional education on a case-by-case basis.

Section 2 of the bill provides an effective date of July 1, 2026.

IV. Constitutional Issues:**A. Municipality/County Mandates Restrictions:**

None.

B. Public Records/Open Meetings Issues:

None.

C. Trust Funds Restrictions:

None.

D. State Tax or Fee Increases:

None.

E. Other Constitutional Issues:

None.

V. Fiscal Impact Statement:**A. Tax/Fee Issues:**

None.

B. Private Sector Impact:

None.

C. Government Sector Impact:

None.

VI. Technical Deficiencies:

None.

VII. Related Issues:

None.

VIII. Statutes Affected:

This bill substantially amends the following section 456.0145 of the Florida Statutes.

IX. Additional Information:

A. Committee Substitute – Statement of Changes:

(Summarizing differences between the Committee Substitute and the prior version of the bill.)

None.

B. Amendments:

None.