



# PREPROPOSAL STATEMENT OF INQUIRY

## CR-101 (October 2017) (Implements RCW 34.05.310)

Do NOT use for expedited rule making

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STATE OF WASHINGTON  
FILED

DATE: January 14, 2025

TIME: 4:28 PM

WSR 25-03-075

**Agency:** Department of Health – Dental Quality Assurance Commission

**Subject of possible rule making:**

Licensure requirements for expanded function dental auxiliaries. The Dental Quality Assurance Commission (commission) is considering amending WAC 246-817-195, Licensure requirements for expanded function dental auxiliaries (EFDA), to allow the amalgam clinical patient requirement to be optional. The commission may consider amendments to other relevant licensure requirement rule sections in chapter 246-817 WAC.

**Statutes authorizing the agency to adopt rules on this subject:**

RCW 18.32.002 and 18.32.0365

**Reasons why rules on this subject may be needed and what they might accomplish:**

The commission has received feedback from various EFDA programs in Washington State pertaining to the challenges students face finding clinical patients for amalgam restorations due to a reduction of amalgam procedures in the community.

On October 11, 2024, during the Dental Quality Assurance Commission Business Meeting, the commission authorized rulemaking to consider amending WAC 246-817-195 making the amalgam clinical patient requirement optional. Updating this rule could modernize the requirements and remove barriers for EFDAs pursuing licensure in Washington State.

**Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies:**

None

**Process for developing new rule (check all that apply):**

- Negotiated rule making
- Pilot rule making
- Agency study
- Other (describe) collaborative rulemaking

**Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:**

Name: Debbie Gardner, Program Manager	(If necessary) Name:
Address: PO Box 47852, Olympia, WA, 98504-7852	Address:
Phone: 360-236-4893	Phone:
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TTY: 771	TTY:
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Web site: www.doh.wa.gov	Web site:
Other:	Other:

**Additional comments:**

Interested parties can participate in the drafting of the proposed rules. The commission will be conducting rule workshops with interested parties and subject matter experts. The commission will use existing GovDelivery lists and other known contact information to inform interested parties of opportunities to provide input on proposed rule language. To find out more information about our rulemaking, visit [doh.wa.gov](http://doh.wa.gov). To subscribe to GovDelivery, please visit [doh.wa.gov](http://doh.wa.gov) and select the button titled "Sign up for Updates From DOH" button at the bottom of the page. After signing in, select "Health Systems Quality Assurance" and "Health Professions" and "Dental." You may also check the box next to one or more of the other professions listed to receive information related to that specific profession.

**Date:** January 7, 2025

**Name:** Bryan Swanson, DDS

**Title:** Dental Quality Assurance Commission Chair

**Signature:**

A handwritten signature in black ink, appearing to read 'Bryan Swanson', is written over a light gray background.