



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

PO Box 47852 · Olympia Washington 98504-7852

**WASHINGTON DENTAL COMMISSION**

**BUSINESS MEETING MINUTES**

**Friday, April 25, 2025**

**MEMBERS PRESENT**

Bryan Swanson, DDS, Chair  
Sonia Pal, DMD, Vice Chair  
Sarah Khan, DMD  
Cheon Joo Yoon, DDS  
Carolyn Spice, Public Member  
Nisha Sharoff, DDS  
Marlynnne Fulton, Public Member  
McKinley Rainey, Public Member  
Evelyn Harry, EFDA  
Rama Oskouian, DMD  
Erich Jurgens, DDS  
Seung Yu, DDS  
Ji Choi, DDS  
David Carsten, DDS, Pro Tem  
Member

**MEMBERS ABSENT**

Samantha Kofler, DDS  
Tiffany Bass, DDS  
Miryam Nossa, EFDA

**STAFF PRESENT**

Trina Crawford, Executive Director  
Bruce Bronoske Jr., Dental Program  
Administrator  
Debbie Gardner, Program Manager  
Cassandra Gerard, Administrative  
Assistant  
Lady Bah, Assistant Program Manager  
Catharine Roner-Reiter, Supervising Staff  
Attorney  
Heather Carter, AAG  
Adriana Barcena, Program Manager  
Kitty Einert, Program Manager  
Mikala Lord, Policy Analyst

**OPEN SESSION**

**OPEN SESSION – 10:05 a.m.**

- 1. CALL TO ORDER** – Bryan Swanson, DDS, Chair
  - 1.1. Introduction of commission members and staff.
    - Ms. Gardner introduces commission members and staff.
  - 1.2. Public Comment.

- Dr. Swanson opens the floor for public comment.
- Dr. Carsten informs the Commission of his contractual duties as a Pro Tem Member as they relate to the business meeting.
- Dr. Tim Hess and Dr. Mark Drangsholt introduce themselves to the Commission.

#### 1.3. Approval of agenda.

- Dr. Swanson requests amending the agenda to include the addition of: Item 2.0 – House Bill 1722, Item 11.4 – Correspondence from Edmond Truelove, DDS, MSD, Item 11.5 – Correspondence from the Washington State Dental Association, and Item 11.6 – Correspondence from Timothy Hess, DDS, MAGD.
- There is a motion to approve the amended agenda.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

#### 1.4. Approval of March 7, 2025, business meeting minutes.

- There is a motion to approve the March 7, 2025, business meeting minutes.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

## 2. House Bill 1722

- Ms. Carter provides the Commission with an overview of House Bill 1722 (HB 1722), which was signed by the Governor on April 21, 2025.
- HB 1722 includes provisions for 16- and 17-year-olds participating in secondary career and technical education programs and other state-approved career pathways.
- Section 4 of the bill does not allow the Department of Labor and Industries (L&I) to prohibit minors from participating in an occupation based on the risk of exposure to bodily fluids or transmission of infectious agents if the minor holds a professional license or certification issued by the Department of Health (DOH) and the license requires competency in relevant procedures for preventing transmission of bloodborne pathogens and infectious diseases.
- Dr. Swanson provides background pertaining to the rules hearing, explaining that the draft rule language aligns with L&I's current rules for minors working in environments where there is risk of exposure to bloodborne pathogens.
- Dr. Carsten encourages the Commission to consider postponing the rules hearing to avoid confusion and allow time for DOH to consult with L&I about the implications of HB 1722.
- Ms. Carter clarifies the procedural steps for a rules hearing continuance.
- Ms. Harry shares that CODA accreditation standards require a high school diploma or equivalent for dental assisting programs, and South Puget Sound Community College requires dental assistant students to be 18 years or older.

## 3. RULES HEARING – The Commission will consider public comment and adoption of proposed rules regarding adding minimum age requirements to WAC 246-817-190, Dental assistant registration. Filed on February 10, 2025, as WSR 25-05-022.

- The hearing begins at 10:15 a.m. and is held via Zoom webinar and in person at the Department of Health, TC2 Room 166, located at 111 Isreal Road SE, Tumwater, WA 98501-5414.
- Dr. Swanson shares that the Commission has received an increased a number of minors applying for dental assisting registration, including applicants as young as 12.
- Dr. Swanson opens the rules hearing for public testimony.
- Lauren Johnson, Government Affairs Manager, Washington State Dental Association (WSDA), encourages the Commission to consider postponing the rules hearing to better understand the impact of HB 1722.
- Ms. Gardner shares that no public comments were received.
- The Commission discusses a rules hearing continuance.
- There is a motion to continue the rules hearing on July 25, 2025, at 10 AM. The hearing will be held in a hybrid format via Zoom webinar and the physical location will be at DOH in Tumwater, Washington.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

**4. LEGISLATIVE UPDATE** – The Commission will receive an update regarding the 2025 legislative session.

- Ms. Gardner shares that the 2025 Legislative Session ends on April 27, 2025.
- Program staff have been tracking a bill that may have an impact on the dental profession; Engrossed Second Substitute House Bill 1686, Healthcare Entity Registry.

**5. RULES UPDATE**

- 5.1. WAC 246-817-135, Dental licensure without examination – Eligibility and application requirements, and WAC 246-817-160 Graduates of nonaccredited schools.
  - Ms. Gardner shares that a CR-101 was filed with the Code Reviser as WSR 24-15-022 on July 9, 2024.
- 5.2. WAC 246-817-773, Continuing education for dentists administering sedation.
  - Ms. Gardner shares that a CR-101 was filed with the Code Reviser as WSR 24-21-038 on October 8, 2024.
- 5.3. Chapter 246-814 WAC, Access to dental care for children.
  - Mr. Bronoske Jr. shares that the Dental Collaboration Committee held a workshop on April 7, 2025, and Ms. Einert will begin working on a CR-102.
- 5.4. Chapter 246-817 WAC, Dentist and dental hygienist compact.
  - Ms. Gardner shares that a CR-101 was filed with the Code Reviser as WSR 24-21-097 on October 17, 2024.
- 5.5. WAC 246-817-195, Licensure requirements for expanded function dental auxiliaries (EFDAs).

- Ms. Gardner shares that a CR-101 was filed with the Code Reviser as WSR 25-03-075 on January 14, 2025.

5.6. WAC 246-817-990, Dentist fees and renewal cycle.

- Ms. Gardner shares that DOH filed a CR-103 with the Code Reviser as WSR 25-07-080 on March 17, 2025.
- The updated fee changes made by House Bill 1972, increasing the surcharge that supports the Washington Physicians Health Program, will increase for dentists from \$50 to \$70 on January 1, 2026.

**6. DENTAL THERAPY COMMITTEE** – Committee meeting held on March 19, 2025, and April 16, 2025 – Dr. Bryan Swanson, Chair

- Dr. Swanson shares that the Dental Therapy Committee tried to meet on April 16, 2025, but experienced a Zoom outage, so the meeting had to be rescheduled.
- Dr. Swanson shares that the committee discussed the practice plan and rules at the March 19, 2025, committee meeting.

6.1. Rachel Campbell, Health Services Quality Assurance Fee and Data Manager, will review dental therapy fees and the dental therapy proviso.

- Ms. Campbell provides the Commission with a presentation detailing how the Secretary of Health establishes licensure fees and reviews the dental therapy fiscal note.
- Ms. Campbell answers questions from the Commission.

6.2. The Commission may discuss requests to modify clinical dental therapy examination requirements.

- Dr. Swanson reviews the comments received regarding dental therapy examinations.
- Dr. Swanson reminds the Commission that the dental therapy examination components are already approved and opens the floor to discuss the comments.
- Mr. Bronoske Jr. provides information about the scope of practice for dental therapists in other states.
- Ms. Johnson, WSDA, encourages the Commission to keep the dental therapy exams consistent with how they have already been approved.
- Colleen Gaylord, RDH, representing the Washington State Dental Hygiene Association and Dental Hygiene Advocates of Washington, expresses concerns about dental therapists taking the dental hygiene periodontal exam and feels like it would be more appropriate for dental therapists to take the dental periodontal exam to align with their training and scope of practice.
- Mr. Bronoske Jr. shares that no other states use the dental periodontal exam; they use the dental hygiene periodontal exam.

6.3. The Commission may vote to approve dental therapy examination modifications.

- Dr. Swanson asks the Commission to consider a proposal to assign the dental therapy examination modifications to the Dental Therapy Committee for further review.
- No proposal is made; the dental therapy examination will remain as it was first approved.

**7. DENTAL COLLABORATION COMMITTEE** – Committee meeting held on April 7, 2025 – Dr. Sonia Pal, Chair

- Dr. Pal shares that the committee discussed rule language for the Dentist and Dental Hygienist Compact, access to dental care for children in Washington State, and clarification of rule language for dental hygienists and dental assistants placing silver diamine fluoride (SDF) in school settings.
- Mr. Bronoske Jr. shares that dental assistants are under general supervision while dental hygienists may work independently in school settings if they follow strict guidelines, and parental consent must be obtained.
- Robin Roderick, RDH, shares her experience with school-based programs, noting that hygienists follow strict protocols for sealants and SDF placement and obtain parental consent.
- Dr. Oskouian asks Ms. Roderick about access to X-rays and appropriate referrals for school-based programs.
- Ms. Roderick discusses the extensive referral system in Eastern Washington and strict training required of dental hygienists who work in school-based programs.
- Ms. Carter shares that the sealant program has been in place since 2001, and dental hygienists must undergo specific training on statewide guidelines to obtain an endorsement.
- Ms. Crawford shares that the access to dental care for children rules are under the authority of the Secretary.

**7.1.** The Commission may vote to approve draft rule language for Chapter 246-817 WAC, Dentist and Dental Hygienist compact.

- There is a motion to approve the draft rule language as presented, which will be updated once the Secretary establishes fees, prior to the CR-102 process.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

**8. EXPANDED FUNCTION DENTAL AUXILIARY (EFDA) COMMITTEE** – Committee meeting held on March 12, 2025 – Dr. Sonia Pal, Chair

- Dr. Pal shares the committee's recommendation to change the amalgam restoration requirement to either a typodont or clinical patient, versus both, due to limited clinical opportunities.

**8.1.** The Commission may vote to approve the draft rule language for WAC 246-817-195.

- There is a motion to approve the draft rule language for the amalgam requirement on a typodont or clinical patient.
- The motion is moved and seconded.

- A vote is taken and unanimously passes.
- 8.2. The Commission may discuss EFDA substantial equivalency requirements for previously approved states.
- Dr. Pal discusses substantial equivalency for EFDAs from other states concerning final impressions.
  - Ms. Carter discusses substantial equivalency.
  - The Commission reassigns the topic of EFDA substantial equivalency requirements to the EFDA Committee for further discussion.

**9. CONTINUING COMPETENCY COMMITTEE** – Committee meeting held on April 21, 2025 – Dr. David Carsten, Pro Tem Member, Vice Chair

9.1. The Commission may vote to approve draft rule language for WAC 246-817-135 and WAC 246-817-160.

- Dr. Carsten discusses the draft rule language for WAC 246-817-135.
- There is a motion to approve the draft rule language in WAC 246-817-135 as presented.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.
- Dr. Carsten discusses the draft rule language for WAC 246-817-160.
- There is a motion to approve the draft rule language in WAC 246-817-160 as presented.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

**10. DENTAL ANESTHESIA COMMITTEE** – Committee meeting held on April 23, 2025 – Dr. Bryan Swanson

- Dr. Swanson shares that only informal discussions occurred at the April 23, 2025, meeting.

10.1. The Commission may vote to approve draft rule language for WAC 246-817-773.

- Dr. Swanson shares that the committee plans to discuss draft rule language for WAC 246-817-773 at the next meeting and will bring it to the Commission once it is approved by the committee.
- No vote is taken.

10.2. The Commission will discuss the Application Requirements for Moderate Sedation with Parenteral Agents Permits Interpretive Statement.

- Dr. Swanson discusses the need to update the interpretive statement to align with current anesthesia rules.
- There is a motion to amend the interpretive statement to align with current anesthesia rules.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

## **11. INTERAGENCY AESTHETICS TASKFORCE – Dr. David Carsten, Pro Tem Member**

### **11.1 The commission may discuss scope of practice regarding neurotoxins and dermal fillers.**

- Dr. Carsten encourages the Commission to consider separating the discussion between neurotoxins and dermal fillers and suggests potential rule writing to clarify training requirements.
- Dr. Carsten discusses RCW 18.32.020, Practice of dentistry defined.
- Dr. Carsten asks Dr. Swanson permission to have Dr. Drangsholt and Dr. Hess present to the Commission.
- Dr. Drangsholt, Chair of Oral Medicine at the University of Washington (UW) and attending clinician at the Center for Pain Relief at UW, provides the Commission with information regarding neurotoxin therapies.
- Dr. Hess, Affiliate Assistant Professor of Oral Medicine at UW, shares his experience teaching neurotoxin and dermal filler programs.
- Dr. Hess supports Dr. Carsten's request to separate the guidance between neurotoxins and dermal fillers due to the increased risk and supervision needed for dermal fillers.
- Dr. Carsten encourages the Commission to consider splitting the statement of withdrawal for neurotoxins and dermal fillers.
- Ms. Crawford shares that a new interpretive statement needs to be opened and drafted since the other interpretive statement is already withdrawn.
- Dr. Carsten discusses neurotoxin and dermal filler predoctoral education with Dr. Hess, Dr. Drangsholt, and the Commission.
- Ms. Carter clarifies that RCW 18.32.020 (4) refers to the curricula in more than one school.
- Dr. Carsten shares that multiple schools teach neurotoxins to predoctoral students.
- Dr. Hess shares that he only knows of one university that teaches dermal fillers to predoctoral students.

### **11.2. The commission may vote to approve a medical spa matrix.**

- Dr. Carsten discusses each section of the matrix as it relates to dentistry.
- Dr. Carsten points out that under the cosmetic injectable section, it clarifies that dermal fillers are within the scope of practice for Oral and Maxillofacial Surgeons.
- Dr. Carsten encourages the Commission to consider approving specific training guidelines for dermal fillers.
- Dr. Carsten asks if the Commission would like to add a line to the matrix that requires training with the approval of the Commission for the application of dermal fillers, or if the Commission would like to gather more information before determining if it meets scope of practice statutory requirements.
- Ms. Carter suggests sending the matrix to a committee to do further research.
- The Commission assigns the matrix to the Continuing Competency Committee.

- Dr. Yu volunteers to join the Continuing Competency Committee.
- 11.3. The commission may vote to approve Interagency Aesthetics Taskforce documents.
- Ms. Gardner shares four documents that the Aesthetics Taskforce would like to use on their webpage – Informed Consent: Aesthetics Practice, Intravenous Therapy Services, Information and Guidance for Operating a Med Spa or Business Offering Aesthetic Services to the Public, and Medical Spa Services Interprofessional Guidance.
  - There is a motion to approve these four Interagency Aesthetics Taskforce documents.
  - The motion is moved and seconded.
  - A vote is taken and unanimously passes.
  - Dr. Carsten discusses the Taskforce Infection Control Checklist and the Dental Infection Control Report and suggests that the Commission should only use the Dental Infection Control Report document to avoid confusion.
  - Ms. Carter agrees with Dr. Carsten’s recommendation and confirms that the Commission does not need to take any action since they are not approving the Taskforce Infection Control Checklist.
  - Ms. Carter notes that the Dental Infection Control Report is already approved by the Commission.
- 11.4. Correspondence from Edmond Truelove, DDS, MSD.
- Dr. Carsten acknowledges correspondence from Dr. Truelove.
- 11.5. Correspondence from the Washington State Dental Association.
- Dr. Carsten acknowledges correspondence from WSDA.
- 11.6. Correspondence Timothy Hess, DDS, MAGD.
- Dr. Carsten acknowledges correspondence from Dr. Hess.

## **12. REGIONAL/NATIONAL ORGANIZATIONS**

- 12.1. Central Regional Dental Testing Services (CRDTS)
- Ms. Gardner shares that CRDTS is asking the Commission to choose a new volunteer to replace Dr. McDaniel for the CRDTS steering committee.
  - Dr. Khan offers to volunteer.
  - There is a motion to approve Dr. Khan to represent the Commission on the CRDTS steering committee.
  - The motion is moved and seconded
  - A vote is taken and unanimously passes.
- 12.2. Dental Assisting National Board (DANB)
- Ms. Gardner shares that DANB has been working on creating a Dental Assisting Professional Model and they are requesting feedback from the Commission.
  - The Commission assigns the Dental Assisting Professional Model to the EFDA Committee for review.

## **13. PUBLIC DISCLOSURE**



- 13.1. The Commission will consider requests for approval from professional associations or educational organizations to receive lists and labels.
- Ms. Gardner shares the list and labels request from CE Learning Systems, LLC.
  - The Commission discusses the request.
  - There is a motion to approve the list and label request from CE Learning Systems, LLC.
  - The motion is moved and seconded.
  - A vote is taken and unanimously passes.

#### **14. PROGRAM REPORT**

- 14.1. Review delegation of signature authority document.
- Ms. Carter explains to the Commission what the Delegation of Signature Authority means.
  - The current document needs to be updated biannually.
  - There is a motion to keep the document checked as it has been in the past, making no changes.
  - The motion is moved and seconded.
  - A vote is taken and unanimously passes.
- 14.2. Recruitment update.
- Ms. Gardner shares that the Commission is seeking three dentist members: one being from the eastern side of the Cascade Range.

#### **15. CORRESPONDENCE**

- 15.1. Correspondence from the American Academy of Pediatric Dentistry.
- Ms. Gardner shares that American Academy of Pediatric Dentistry wrote a letter in support of community water fluoridation and invited the Commission to sign the letter.
  - Ms. Carter shares that the Board of Health regulates water fluoridation, and the Commission can treat this letter as informational.
- 15.2. Correspondence from Michael Johnson, DDS, MS.
- Dr. Swanson acknowledges correspondence from Dr. Johnson and asks the Commission for comments.
  - No comments are received.

#### **16. FUTURE BUSINESS**

- Dr. Swanson shares that Dr. Pal will be completing her time on the Commission soon and Ms. Gardner presents Dr. Pal with a gift.
- Dr. Swanson acknowledges Dr. Joy McDaniel's time on the Commission and extends appreciation for her service.

#### **17. ADJOURN**

- The meeting is adjourned at 12:23 p.m.

**Submitted by:**

Debbie Gardner, Program Manager  
Washington Dental Commission

on file \_\_\_\_\_

Signature

\_\_\_\_\_  
Date

**Approved by:**

Bryan Swanson, DDS, Chair  
Washington Dental Commission

on file \_\_\_\_\_

Signature

\_\_\_\_\_  
Date

DRAFT