



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
PO Box 47852 · Olympia Washington 98504-7852

WASHINGTON DENTAL COMMISSION
DENTAL THERAPY COMMITTEE MEETING MINUTES
Wednesday, May 21, 2025

MEMBERS PRESENT

Sonia Pal, DMD
Sarah Khan, DMD
Mac Rainey, Public Member
Erich Jurges, DDS
Miryam Nossa, EFDA

MEMBERS ABSENT

Bryan Swanson, DDS
Samantha Kofler, DDS
Tiffany Bass, DDS

STAFF PRESENT

Kitty Einert, Program Manager
Bruce Bronoske Jr., Dental Program
Administrator
Trina Crawford, Executive Director
Debbie Gardner, Program Manager
Lady Bah, Assistant Program Manager
Kristopher Holiday, Office Director
Heather Carter, Assistant Attorney General
Britni McLucas, Health Services
Consultant
Cassandra Gerard, Administrative
Assistant

OPEN SESSION

OPEN SESSION – 12:03 p.m.

1. CALL TO ORDER – Dr. Pal, DMD Vice Chair

1.1. Introduction of committee members and staff.

- Ms. Einert introduces committee members and staff.

1.2. Approval of agenda

- There is a motion to approve the agenda.
- The motion is moved and seconded.

1.3. Approval of February 19, 2025, and March 19, 2025, meeting minutes

- There is a motion to approve the February 19, 2025 and March 19, 2025 meeting minutes.
- The motion is moved and seconded.

2. DENTAL THERAPIST PRACTICE PLAN CONTRACT AGREEMENT – The committee

and department work on the practice plan contract/agreement to ensure it aligns with the statute and the most current draft rules.

- Ms. Einert shares the recent comments received that could affect the draft practice plan agreement.
- Ms. Einert shares language was added to WAC 246-819-080(3) and the practice plan agreement that states revisions need to be submitted no later than 30 days from the time the revision was made to the agreement.
- Ms. Einert shares a comment received that requests direct oversight of a licensed dentist through close supervision be required during the following procedures: non-surgical extractions of erupted permanent teeth under limited conditions, periodontal scaling and root planing, emergency palliative treatment of dental pain, cavity preparation, restoration of primary and permanent teeth, indirect and direct pulp capping on primary and permanent teeth, stabilization of reimplanted teeth, extractions of primary teeth, and recementing of permanent crowns.
- Dr. Jurges shares his experience of performing the procedures included in the comment. He states it may be difficult to predict the complexity of the procedure beforehand, and it is reasonable to have a dentist on site for some of the procedures.
- Dr. Khan shares in previous meetings the committee discussed supervision levels in other states and the need for dental therapists to provide service to underserved areas. She recommends a dentist on site for extractions due to the level of expertise needed and the ability to solve any complications that may occur.
- Ms. Nossa comments that access to care should be considered when making this decision. She asked what procedures dental therapist programs are allowing students to perform without a dentist on site.
- An anonymous attendee requests Ms. Carter's response to the suggestion of requiring close supervision considering the statute states that the supervising dentist sets the level of supervision.
- Ms. Einert reminds the committee there is an area on the practice plan agreement for scope of practice instructions and limitations.
- Ms. Flaig representing the Washington State Dental Association (WSDA), suggests defining the levels of supervision in the rules. WSDA is in favor of a licensed dentist on the premises for certain procedures for the safety of patients.
- Ms. Flaig comments on the level of supervision required for dental hygienists to perform scaling and root planing and suggests the same be considered for dental therapy.
- Dr. Hogan, Dental Director of the Swinomish Tribal Dental Clinic, shares the levels of supervision in their clinic is to the discretion of the supervising dentist and varies by dental therapist.
- Dr. Warren shares how practice plan contracts can be used to prepare for emergency situations and protect the patients.
- Mr. Narvaez comments that excessive restrictions may limit dental therapists' ability to serve underserved populations and stresses that

contingency plans are necessary to the profession.

- Ms. Carter reviews [RCW 18.265.060](#) regarding levels of supervision being determined by the supervising dentist in the practice plan agreement.
- Mr. Bronoske Jr. explains limited conditions regarding non-surgical extractions were addressed during previous committee meetings.
- Ms. Flaig asks if the statute language precludes the committee from including any further specificity on supervision requirements in the rules or if it is meant to be open to interpretation. WSDA urges the committee to consider defining scope of practice parameters to protect public safety.
- Dr. Mabry shares his experience as the preclinical director for the dental therapy program teaching students diagnosis and treatment planning.
- Ms. Flaig requests the committee consider [RCW 18.32.020](#) regarding diagnostics in the dental therapist scope of practice. She suggests allowing dental therapists to perform diagnostic functions independently may result in unlicensed practice of dentistry.
- Ms. Carter refers to [RCW 18.32.030](#) regarding the exemption of certain licensed professionals performing dental operations or services within their scope not to be considered unlicensed practice.

3. DENTAL THERAPY RULES – The committee and department discuss minor changes to the language to the dental therapy draft rules.

- Ms. Einert shares the changes made to the language of the dental therapy draft rules and asks for the committee's input.
- Mr. Rainey suggests updating the term dental school to dental therapy program in the licensure requirement section.

4. DENTAL THERAPIST EXAMS – The committee and department discuss comments received regarding the written and clinical exam.

- Ms. Einert suggests a discussion on substantially equivalent dental therapy education for licensing purposes.
- Mr. Bronoske Jr. explains a recommendation is needed for a candidate seeking to take the dental therapy exam. He suggests reviewing and discussing the material provided by the candidate before presenting it to the Commission for approval.
- Dr. Warren, Skagit Valley College Dental Therapy Program Director, shares her review of the candidate's dental therapy education. She comments it may be difficult for out of state license applicants to meet the Washington State standards.
- Mr. Bronoske Jr. explains the substantial equivalency requirements for each type of dental therapy license.
- Ms. Carter advises the applicant to contact the program directly to discuss the correct path to licensure rather than the committee continuing to discuss an individual's application.
- Dr. Pal requests a comparison of New Zealand and Washington State dental therapy program requirements to determine substantial equivalency.
- Dr. Kelso, former dental director, shares dental therapists in Alaska are certified in

the tribal community health aid program rather than being licensed by the state.

- Dr. Jurges suggests the committee focus on the dental therapy rules considering this year's dental therapy program graduates will be applying for licenses.
- Ms. Flaig asks the committee to consider defining dental anesthesia and nitrous administration by dental therapists.
- Ms. Flaig comments on including a 30-day submission limit to the definition of the practice plan agreement.
- Ms. Flaig suggests keeping the previous malpractice insurance language for clarity, enforcement, and aligning with other dental licensure standards.
- Mr. Bronoske Jr. suggests clarifying anesthesia and nitrous administration after the rules have been filed.
- Ms. Flaig believes the definition of anesthesia and nitrous administration is an important issue to the Regulatory Affairs Committee and would prefer it to be addressed before the next step in the rules process.
- Ms. Carter suggests [WAC 246.817.740](#) as a reference regarding anesthesia and nitrous administration.
- Ms. Flaig suggests record-keeping requirements, equipment, emergency medication, discharge criteria, continuing education and requirements for licensure to be included in the definition of dental anesthesia and nitrous administration by dental therapists.
- Dr. Hogan asks for clarification on how substantial equivalency is determined and when students can expect to take the exam for licensure.
- Mr. Bronoske Jr. explains the Washington Dental Commission and the Secretary's authority in determining substantial equivalency. The rules are expected to be completed in September 2025 based on the current timeline.

5. CORRESPONDENCE

- No correspondence received at this time.

6. FUTURE BUSINESS

- New Zealand Dental Therapy program equivalency
- Rules update
- HELMS update
- Application form
- Practice plan agreement
- Jurisprudence exam

7. ADJOURN

- The meeting is adjourned at 1:03 PM.

Submitted by:

Kitty Einert, Program Manager
Washington Dental Commission

Approved by:

Sonia Pal, DMD, Vice Chair
Washington Dental Commission

Signature

Signature

Date

Date