



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

PO Box 47852 · Olympia Washington 98504-7852

**WASHINGTON DENTAL COMMISSION  
BUSINESS MEETING MINUTES**

**Friday, July 25, 2025**

**MEMBERS PRESENT**

Bryan Swanson, DDS, Chair  
Sonia Pal, DMD, Vice Chair  
Carolyn Spice, Public Member  
Miryam Nossa, EFDA  
Marlynne Fulton, Public Member  
McKinley Rainey, Public Member  
Rama Oskouian, DMD  
Seung Yu, DDS  
Ji Choi, DDS

**MEMBERS ABSENT**

Samantha Kofler, DDS  
Tiffany Bass, DDS  
Dr. David Carsten  
Dr. Nisha Sharoff  
Sarah Khan, DMD  
Cheon Joo Yoon, DDS  
Evelyn Harry, EFDA

**STAFF PRESENT**

Trina Crawford, Executive Director  
Bruce Bronoske Jr., Program Manager  
Debbie Gardner, Program Manager  
Cassandra Gerard, Administrative Assistant  
Lady Bah, Assistant Program Manager  
Catharine Roner-Reiter, Supervising Staff Attorney  
Jane Zepp, Credentialing Supervisor  
Sierra McWilliams, Assistant Attorney General  
Jeff Orwig, Financial Officer  
Rachel Campbell, Health Services Quality Assurance Fee and Data Manager  
Adriana Barcena, Program Manager  
Kitty Einert, Program Manager  
Mikala Lord, Policy Analyst

**OPEN SESSION**

**OPEN SESSION – 10:03 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.
    - No comment received.

1.3. Approval of agenda.

- Dr. Swanson requests amending the agenda to include the addition of Item 6.2 – The Commission may vote to approve substantially equivalent states for EFDA licensure.
- 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 June 13, 2025, business meeting minutes.

- There is a motion to approve the June 13, 2025, business meeting minutes.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

**2. 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 May 21, 2025, as WSR 25-11-083.

- The hearing begins at 10:08 a.m. and is held via Zoom webinar and in person at the Department of Health, TC2 Room 167, located at 111 Israel Road SE, Tumwater, WA 98501-5414.
- Dr. Swanson shares that the Commission has received an increased number of minors applying for dental assisting registration, including applicants as young as 12.
- The proposed amendments to WAC 246-817-190 align with the Department of Labor and Industries (L&I) WAC 296-125-030 and would allow the Commission to enforce prohibiting minors from working in environments where there is the potential for exposure to bloodborne pathogens, unless the minor is a student in a bona fide health care career training or vocational education program.
- Dr. Swanson shares that a minor is defined by L&I in WAC 296-125-015 as a person under the age of 18.
- Dr. Swanson opens the rules hearing for public testimony.
- Dr. Katherine Christian asks if someone who passes a program at a skills center and is certified as a dental assistant could work if they are under the age of 18.
- Ms. Gardner explains that current L&I rules require workers to be 18 years of age if they are working in an environment where there is the potential for exposure to bloodborne pathogens.
- Ms. Gardner shares that L&I will be implementing House Bill 1722, which intends to close the gap between when a minor graduates from a bona fide healthcare program until they turn 18.
- Dr. Bryan Edgar encourages the Commission to seek clarification from L&I regarding if someone who graduates from a program will be allowed to work if they are still a minor.

- Dr. Swanson shares that the rules hearing continuance for dental assistant registration was due to the anticipated changes that L&I may implement with House Bill 1722.
- Ms. Gardner shares that if the Commission decides to adopt the proposed rule language, the Commission can deny applications from minors for now and then revisit the rule once L&I completes the rulemaking process.
- The hearing is concluded at 10:18 a.m.
- Dr. Swanson opens the discussion to the Commission.
- Dr. Pal shares that the best-case scenario would be if minors who have graduated from bona fide healthcare programs will be able to obtain a dental assistant credential through the Department of Health once L&I completes the rulemaking process.
- No changes are recommended by the Commission.
- There is a motion to adopt the proposed rules as presented.
- The motion is moved and seconded.
- A vote is taken and unanimously passes by all present commission members; the rule is passed.
- The notice of adoption will be filed with the Code Reviser and the rules will be effective 31 days from the date they are filed.

### **3. CDCA-WREB-CITA AND THE AMERICAN BOARD OF DENTAL EXAMINERS (ADEX) –**

Alex Vandiver, Chief Executive Officer

3.1. Mr. Vandiver will present to the Commission on the pending merger of CDCAWREB-CITA and ADEX.

- Due to unforeseen circumstances, this item will be moved to a future business meeting.

### **4. SEATTLE ORAL SURGERY ACADEMY**

4.1. The Commission will review Seattle Oral Surgery Academy, Sohaib Soliman, DDS, to be an approved organization under RCW 18.32.030 (4).

- Dr. Swanson facilitates a discussion with the Commission regarding Seattle Oral Surgery Academy's (SOSA) request for exemption, per RCW 18.32.030 (4).
- Dr. Swanson recommends conditionally approving SOSA based on PACE approval.
- Dr. Yu asks who would be responsible if a patient complaint arose against an out-of-state dentist who was attending a SOSA course.
- Ms. McWilliams shares that it is the duty of the state that licenses the dentist and that there could be the potential to revoke the approval for participation in clinical courses.
- Dr. Soliman provides the Commission with an overview of the SOSA pending PACE status, course content, safety protocols, and sedation practices.
- There is a motion to conditionally approve SOSA to be an approved organization under RCW 18.32.030 (4), pending PACE approval.

- The motion is moved and seconded.
- A vote is taken and unanimously passes.

## **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 the CR-102 rule package is currently in the internal review process.
  - Once completed and published with the Code Reviser, interested parties will be notified.
- 5.2. WAC 246-817-773, Continuing education for dentists administering sedation.
  - Ms. Gardner shares that the CR-102 rule package is currently in the internal review process.
  - Once completed and published with the Code Reviser, interested parties will be notified.
- 5.3. Chapter 246-814 WAC, Access to dental care for children.
  - Ms. Einert reports that the CR-102 rule package for WAC 246-814-020 and WAC 246-817-030 is in the internal review process and interested parties will be notified when it is completed.
- 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.
  - Rachel Campbell, Health Services Quality Assurance Fee and Data Manager, Campbell provides the Commission with a presentation detailing how the Secretary of Health establishes licensure fees and reviews the compact fee fiscal note, which will align with current dentist licensing fees.
  - Dr. Robin Reinke asks if compact fees will include the impaired surcharge fee.
  - Ms. Crawford shares that she does not believe the impaired surcharge fee will be included in the compact fees, since the services that the Washington Physicians Health Program provides are for Washington State dentists.
- 5.5. WAC 246-817-195, Licensure requirements for expanded function dental auxiliaries (EFDAs).
  - Ms. Gardner shares that the CR-102 rule package is currently in the internal review process.
  - Once completed and published with the Code Reviser, interested parties will be notified.

## **6. EXPANDED FUNCTION DENTAL AUXILIARY (EFDA) COMMITTEE — Committee meeting held on June 23, 2025 – Dr. Sonia Pal, Chair**

- 6.1. The Commission will review and consider a potential rule petition from Alesia Richardson.

- Dr. Pal shares that the committee reviewed a potential rule petition to allow EFDAs to administer local anesthetics, which would require a legislative change, as it is not within the current scope of practice for EFDAs.
- There is a motion to deny the rules petition.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.
- Ms. Gardner will draft an official response to Ms. Richardson on behalf of the Commission.

6.2. The Commission may vote to approve substantially equivalent states for EFDA licensure.

- Dr. Pal facilitates a discussion with the Commission regarding whether final impressions should be required for substantial equivalency when evaluating EFDAs applying for licensure from other states.
- Dr. Pal discusses discrepancies regarding final impression training for states that have been previously approved as substantially equivalent.
- Ms. Gardner asks the Commission to consider two separate votes: one to determine if final impressions are required for substantial equivalence for EFDAs from other states, and the other to align the requirements of states that have been previously approved.
- Ms. Nossa shares that she would like to hear from dentist member commissioners prior to providing the Commission with her opinion.
- Dr. Swanson facilitates a discussion with the Commission regarding dentists providing on-the-job training for EFDAs who did not complete final impression training in the state where they obtained EFDA licensure.
- Dr. Yu shares that he supports dentists providing final impression on-the-job training for out-of-state EFDAs since it is a reversible procedure that the dentist is ultimately responsible for.
- Ms. Nossa states that after hearing from other commissioners, she is open to the idea of not requiring training in final impressions from EFDAs of other states to meet substantial equivalency requirements for EFDA licensure in Washington State.
- Dr. Pal agrees with not requiring final impressions to be part of EFDA substantial equivalency from other states.
- There is a motion to approve EFDAs from other states for substantial equivalency if they have completed the appropriate restorative training, even if they have not completed final impression training.
- The motion is moved and seconded.
- A vote is taken and passes unanimously.
- Colleen Gaylord, representing the Dental Hygiene Advocates of Washington, raises concerns about the Commission allowing on-the-job training for final impressions, and asks the Commission if this open up other functions within scope to only require on-the-job training.

- Ms. McWilliams shares that the statute allows the Commission to determine whether other state regulations and training meet substantial equivalence for Washington State, and that it does not have to perfectly align with Washington education and licensing requirements if it meets the minimum threshold for scope of practice and safety standards.
- There is a motion to remove the requirement for fixed and removable prosthodontic permits for the candidates from Missouri seeking an EFDA credential in Washington State.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

**7. EDUCATIONAL OUTREACH COMMITTEE**– Committee meeting held on June 26, 2025 – Marlynnne Fulton, Public Member, Chair

- Ms. Fulton reports that the committee reviewed and approved articles for the next newsletter and scheduled an August meeting to begin planning for the fall retreat.

**8. DENTIST AND DENTAL HYGIENIST COMPACT (DDH COMPACT)**– DDH Compact Commission Meeting held on July 14, 2025 – Catharine Roner-Reiter, Supervising Staff Attorney

- Ms. Roner-Reiter shares that the DDH Compact Commission was introduced to the new Executive Director, they received legislative and rules committee updates, and she volunteered to join the Finance Committee.
- Ms. Roner-Reiter shares that the Rules Committee met and held an executive session on June 27, 2025.

**9. INTERAGENCY AESTHETICS TASKFORCE** — Committee meeting held on July 16, 2025 – Dr. David Carsten, Pro Tem Member, Vice Chair

- Ms. Roner-Reiter shares that the taskforce discussion focused on the next steps pertaining to public media education and legislative outreach regarding education.

**10. OPERATING BUDGET REPORT** – Jeff Orwig, Finance Officer, will present to the Commission on the Operating Budget Report.

- Mr. Orwig presents the Commission with the current Operating Budget Report, which covers July 1, 2023, through June 30, 2025.

**11. 2025-2027 BUSINESS PLAN**

11.1 The Commission may vote to approve the 2025 – 2027 business plan.

- Ms. Gardner presents the 2025 – 2027 business plan for the Washington Dental Commission with the updated edits that were discussed during the June 13, 2025, business meeting.

- There is a motion to approve the 2025 – 2027 business plan with the presented edits.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

## **12. DENTAL ANESTHESIA**

- 12.1. The Commission may vote to approve FAQs pertaining to on-site inspections.
  - Dr. Swanson asks if there are any comments pertaining to the FAQs.
  - There is a motion to approve the FAQs as presented.
  - The motion is moved and seconded.
  - A vote is taken and unanimously passes.
- 12.2. The Commission may vote to approve the Dental Sedation Inspection Report.
  - No vote is taken.
- 12.3. The Commission may vote to approve updates to on-site inspection forms.
  - Dr. Yu discusses potential edits to the general anesthesia on-site inspection form regarding simulated emergency protocols.
  - Ms. Gardner asks Dr. Swanson if the dental anesthesia forms should be assigned to the Dental Anesthesia Committee for further review.
  - There is a motion to assign the Dental Sedation Inspection Report and on-site inspection forms to the Dental Anesthesia Committee.
  - The motion is moved and seconded.
  - A vote is taken and unanimously passes.

## **13. INTERPRETIVE AND POLICY STATEMENTS – The Commission will review current interpretive and policy statements.**

- Ms. Gardner shares that the Commission has been asked to review the current interpretive and policy statements and determine if they should be updated, rescinded, converted to rules, or kept as is.
- 13.1. Novel Coronavirus Disease 2019 (COVID-19) Vaccine Ordering and Administration
    - Dr. Swanson facilitates a discussion with the Commission regarding the interpretive statement.
    - Ms. Spice asks if dentists would still be allowed to administer COVID-19 vaccines if the interpretive statement is rescinded.
    - Ms. McWilliams shares that the purpose of interpretive statements is to provide advisory opinions and rescinding it is not making a practice decision, it just removes the active advisory opinion.
    - There is a motion to rescind the Novel Coronavirus Disease 2019 (COVID-19) Vaccine Ordering and Administration interpretive statement.
    - The motion is moved and seconded.
    - A vote is taken and unanimously passes.
  - 13.2. Dentist Standard of Care – Radiographs

- Ms. Gardner shares that this interpretive statement is referenced often by the program and stakeholders.
- The Commission discusses the interpretive statement.
- There is a motion to keep the Dentist Standard of Care – Radiographs interpretive statement with a review date of July 25, 2025.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

#### 13.3. Dentist – Sleep Dentistry

- Ms. Gardner shares that if the Commission chooses to keep this interpretive statement, the footnotes will need updating to reflect current sedation rules.
- Ms. McWilliams shares that updating the footnotes is not a substantive change, and the edits do not need to be brought back to the Commission for approval.
- The Commission discusses the interpretive statement.
- There is a motion to keep the Dentist – Sleep Dentistry interpretive statement with a review date of July 25, 2025, and update the footnotes.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

#### 13.4. Application Requirements for Moderate Sedation with Parenteral Agent Permits

- Ms. Gardner shares that the Commission previously approved edits to this interpretive statement that reflect the updated sedation rules that were effective January 11, 2024.
- Ms. Gardner shares that the policy team is recommending rescinding this interpretive statement since the previously approved edits are in the current rule.
- The Commission discusses the interpretive statement.
- There is a motion to rescind the Application Requirements for Moderate Sedation with Parenteral Agent Permits interpretive statement.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

#### 13.5. Pediatric Sedation Endorsement

- Ms. Gardner shares that the Pediatric Sedation Endorsement was effective on June 30, 2025, and the policy statement is no longer needed.
- The Commission discusses the policy statement.
- There is a motion to rescind the Pediatric Sedation Endorsement policy statement.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

### 14. REGIONAL/NATIONAL ORGANIZATIONS

14.1. Washington State Dental Association (WSDA) – 2025 WSDA House of Delegates, September 25-27, 2025, Tacoma, WA



- The Commission may vote to approve sending staff and commission members to the 2025 WSDA House of Delegates.
- Ms. Gardner shares that an invitation was received to the WSDA 2025 House of Delegates, and staff will be submitting a report on behalf of the Commission.
- Historically, staff and commissioners have represented the Commission at the WSDA House of Delegates.
- Lauren Johnson, WSDA, shares that WSDA would like to have the Commission represented at the 2025 House of Delegates.
- Dr. Edgar suggests having a representative from the Commission present a brief report instead of just submitting a report.
- Dr. Pal shares that she is a Pierce County delegate and would be willing to represent the Commission at the WSDA 2025 House of Delegates.
- Dr. Swanson offers to represent the Commission at the WSDA 2025 House of Delegates.
- Dr. Oskouian expresses interest in representing the Commission at the WSDA 2025 House of Delegates.
- There is a motion to approve sending Dr. Pal, Dr. Swanson, and Dr. Oskouian to the WSDA 2025 House of Delegates to represent the Commission.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.
- Ms. Crawford shares that staff attendance is up to the Commission and may not be necessary if three commissioners are attending.
- There is a motion to approved up to two staff, including Ms. Gardner and Ms. Crawford, to attend the WSDA 2025 House of Delegates.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

## **15. PROGRAM REPORT**

### **15.1. Recruitment and pro tem update.**

- Ms. Gardner shares that the Commission is seeking three dentist members, including one from the east side of the Cascade Range.
- Interviews are being finalized, and the appointment package will be submitted to the Governor's Office upon completion.
- Ms. Gardner shares that Dr. David Carsten, Dr. Kunal Walia, and Dr. Karen Clements have been reappointed as pro tem members for one-year terms.

## **16. OTHER**

### **16.1. The Commission will review the Delegation of Decision-Making document.**

- Ms. McWilliams shares that the purpose of the delegation document is to improve efficiency by delegating certain administrative proceedings that do not require specialized expertise to the Office of Investigative and Legal Services or to a presiding officer/health law judge.

- Mr. Rainey asks Ms. McWilliams if any additional delegations should be considered.
- Ms. McWilliams shares that the current delegations cover the core proceeding items.
- There is a motion to keep the current Delegation of Decision-Making document as is.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

## **17. FUTURE BUSINESS**

- No future business is discussed.

## **18. ADJOURN**

- The meeting is adjourned at 11:40 p.m.

### **Submitted by:**

Debbie Gardner, Program Manager  
Washington Dental Commission

### **Approved by:**

Bryan Swanson, DDS, Chair  
Washington Dental Commission

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

Signature

\_\_\_\_\_  
Date

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

Signature

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Date