



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

PO Box 47852 · Olympia, Washington 98504-7852

WASHINGTON DENTAL COMMISSION

BUSINESS MEETING MINUTES

Friday, October 24, 2025

MEMBERS PRESENT

Bryan Swanson, DDS, Chair
Carolyn Spice, Public Member, Vice Chair
Erich Jurgens, DDS
Marlyne Fulton, Public Member
Rayna Strong, DMD
Cheon Joo Yoon, DDS
Seung Yu, DDS
Ji Choi, DDS
Sarah Khan, DMD
Evelyn Harry, EFDA
Srinivasa R. Chandra, MD, BDS
Rama Oskouian, DMD
Ashley Ulmer, DDS

MEMBERS ABSENT

Miryam Nossa, EFDA
Minou Karbakhsch, DDS
McKinley Rainey, Public Member
Nisha Sharoff, DDS

STAFF PRESENT

Kristopher Holiday, Office Director for the
Office of Health Professions
Bruce Bronoske Jr., Interim Executive
Director
Debbie Gardner, Program Manager
Cassandra Gerard, Administrative
Assistant
Lady Bah, Assistant Program Manager
Catharine Roner-Reiter, Supervising Staff
Attorney
Heather Carter, Assistant Attorney
General
Kitty Einert, Program Manager
Mikala Lord, Policy Analyst
Adriana Barcena, Program Manager
Scott Gadman, Compliance Officer

OPEN SESSION

OPEN SESSION – 10:02 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 4.2 – The Commission may vote to approve the ADEX practical examination and Item 15.1 – The Commission may vote to approve representatives for the University of Washington School of Dentistry AEGD initial CODA accreditation site visit – December 2025.
- 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 September 5, 2025, business meeting minutes.

- There is a motion to approve the September 5, 2025, business meeting minutes.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

2. RULES HEARING – WAC 246-817-195, Licensure requirements for expanded function dental auxiliaries (EFDAs). Filed on August 11, 2025, as WSR 25-17-018.

2.1. The Commission will consider public comment and adoption of proposed rules regarding allowing the training for amalgam restorations on actual clinical patients to be optional.

- The hearing begins at 10:07 a.m. and is held via Zoom webinar and in person at the Department of Health, TC2 Room 166/167, located at 111 Israel Road SE, Tumwater, WA 98501-5414.
- Dr. Swanson shares that the Commission has received feedback from various EFDA programs in Washington State about the challenges students face in finding clinical patients for amalgam restorations due to a reduction of amalgam procedures in the community.
- The proposed rule allows amalgam restoration training on typodonts or on clinical patients, rather than requiring both.
- Dr. Swanson opens the rules hearing for public testimony.
- No public testimony given.
- The hearing is concluded at 10:11 a.m.
- Dr. Swanson opens the discussion to the Commission.
- No changes are recommended by the Commission.
- There is a motion to adopt the proposed rule as presented.
- The motion is moved and seconded.
- A vote is taken and unanimously passed 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. RULES HEARING – WAC 246-817-190, Dental assistant registration. Filed on September 12, 2025, as WSR 25-19-063.

3.1. The Commission will consider public comment and adoption of proposed rules regarding adding minimum age requirements to dental assistant registration.

- The hearing begins at 10:012 a.m. and is held via Zoom webinar and in person at the Department of Health, TC2 Room 166/167, 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.
- A minor is defined by L&I in WAC 296-125-015 as a person under the age of 18.
- Dr. Swanson shares that this is the third proposal of the draft rule language, which was initially proposed on February 10, 2025, as WSR 25-02-022, with a public hearing held on April 25, 2025, and then continued with WSR 25-11-083 filed on May 21, 2025, with a public hearing on July 25, 2025.
- This third and final proposal of the same language allows the commission time to finalize the rulemaking according to the Administrative Procedures Act timelines. The commission has retained comments from the previous two hearings and will evaluate these as part of the final completion of the rule.
- Dr. Strong asks if the proposed rule language allows minor students to go into the workforce as dental assistants after they have completed a training program, or if it only allows them to participate in a training program.
- Dr. Swanson shares that minor students are only allowed to participate in training programs.
- Ms. Gardner shares that there are exceptions for minor students to participate in bona fide healthcare programs, and that current L&I rules prohibit minors from working in environments where there is the potential for exposure to bloodborne pathogens.
- Ms. Gardner shares that L&I is currently working to implement bills relating to minor labor, and the program staff is monitoring the rulemaking process.
- Dr. Swanson opens the rules hearing for public testimony.
- No public testimony given.
- The hearing is concluded at 10:18 a.m.
- Dr. Swanson opens the discussion to the Commission.
- Dr. Strong addresses the written comment from the Puget Sound Skills Center regarding minor students who have completed the training program and are interested in working before age 18.

- Ms. Gardner shares that L&I rules currently prohibit minors from working in dental environments, and L&I is currently implementing House Bill 1722, which addresses the gap between completing a training program and turning 18.
- Mr. Bronoske Jr. shares that the Department of Health cannot issue a license that goes against another agency's rules, and reiterates that program staff will monitor L&I's rulemaking process.
- No changes are recommended by the Commission.
- There is a motion to adopt the proposed rule as presented.
- The motion is moved and seconded.
- A vote is taken and unanimously passed 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.

4. AMERICAN BOARD OF DENTAL EXAMINERS (ADEX) – Alex Vandiver, Chief Executive Officer

4.1. Mr. Vandiver will present to the Commission on the merger of CDCA-WREB-CITA and ADEX.

- Mr. Vandiver presents to the Commission on the merger of CDCA-WREB-CITA and ADEX, discusses updates to the ADEX dental and dental hygiene examinations, and answers questions from the Commission and program staff.

4.2. The Commission may vote to approve the ADEX practical examination.

- Dr. Swanson suggests that the Commission formalize the acceptance of the ADEX examination, which was formally approved by the Commission under the CDCA-WREB-CITA name, and asks the Commission for comments.
- No comments received.
- There is a motion to accept the ADEX examination, formally called CDCA-WREB-CITA.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

5. CONTINUING EDUCATION (CE) FOR DISCIPLINARY PURPOSES – Scott Gadman, Compliance Officer

5.1. Mr. Gadman will update the Commission regarding CE for disciplinary purposes.

- Mr. Gadman provides the Commission with an overview of the CE preapproval process for the most frequently ordered CE topics and proposes adding two additional topics to the preapproved CE list: patient rights and informed consent.

5.2. The Commission may vote to approve CE for disciplinary purposes.

- Dr. Swanson discusses Mr. Gadman's proposal with the Commission.
- There is a motion to approve the proposal of adding patient rights and informed consent to the CE preapproved list.

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

6. RULES UPDATE

6.1. 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.

6.2. 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.

6.3. Chapter 246-814 WAC, Access to dental care for children.

- Ms. Einert shares that this rule package was filed on February 3, 2025, as WSR 25-04-089, and the CR-102 is in the internal review stages.

6.4. 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.

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

- Ms. Gardner shares that the policy team will manage the rulemaking process for WAC 246-817-990 to add the Washington Physicians Health Program surcharge to initial licensure for dentists, and she will provide the Commission with updates on the rulemaking process.

6.6. WAC 246-817-120, Examination content.

- Ms. Gardner asks the Commission to approve opening WAC 246-817-120 for rulemaking to update testing agency names.
- There is a motion to open WAC 246-817-120 for rulemaking.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

7. EDUCATIONAL OUTREACH COMMITTEE– Committee meeting held on September 22, 2025 – Carolin Spice, Public Member

- Ms. Spice reports that the committee reviewed and approved articles for the November newsletter, along with the Washington State Dental Association (WSDA) article and the October retreat agenda.

8. INDEPENDENT COMMISSION COMMITTEE – Committee meetings held on September 15, 2025, and October 7, 2025 – Dr. Rama Oskouian, Chair

- Dr. Oskouian reports that she and Dr. Swanson attended the 2025 WSDA House of Delegates, where Dr. Swanson discussed the Commission's interest in pursuing independence.
- Dr. Oskouian notes that further discussions will continue within the Independent Commission Committee.

9. INTERAGENCY AESTHETICS TASKFORCE – Meeting held on September 10, 2025 – Catharine Roner-Reiter, Supervising Staff Attorney

- Ms. Roner-Reiter reports that the taskforce discussed having individual boards and commissions send out a public advisory statement in upcoming newsletters and additional potential educational outreach opportunities.

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

- Ms. Roner-Reiter shares that the DDH Compact Commission meeting included an update from the Rules Committee and Finance Committee, and discussions included the clinical assessment definition, background check requirements, budgeting and funding materials from other compacts, and the data system.

11. SWEDISH MEDICAL CENTER-DENTAL DEPARTMENT – Commission on Dental Accreditation (CODA) site visit on September 17, 2025 – Dr. Nisha Sharoff

- Dr. Swanson shares that Dr. Sharoff attended the September 17, 2025, CODA site visit at the Swedish Medical Center Dental Department.

12. REGIONAL/NATIONAL ORGANIZATIONS

12.1. 2025 Washington State Dental Association House of Delegates – September 25-27, 2025, Tacoma, WA – Dr. Bryan Swanson and Dr. Rama Oskouian

- Dr. Swanson shares that he and Dr. Oskouian attended the 2025 WSDA House of Delegates.

12.2. American Association of Dental Administrators Annual Meeting – October 15-16, 2025, Grapevine, TX – Bruce Bronoske Jr.

- Mr. Bronoske Jr. shares that he attended the American Association of Dental Administrators Annual Meeting and collaborated with other state dental boards on regulatory issues.

12.3. American Board of Dental Examiners (formerly CDCA-WREB-CITA) Annual Meeting – October 16-18, 2025, Grapevine, TX – Dr. Nisha Sharoff

- Mr. Bronoske Jr. shares that he and Dr. Sharoff attended the ADEX Annual Meeting, where presentations included the merger and updates to examinations.

12.4. American Association of Dental Boards Annual Meeting – October 18-19, 2025, Grapevine, TX – Dr. Nisha Sharoff

- Mr. Bronoske Jr. shares that Dr. Sharoff attended the American Association of Dental Boards Annual Meeting; meeting presentations and discussions included artificial intelligence, national dental and dental hygiene testing, and compacts.

13. ELECTIONS

13.1. The Commission will elect the 2025-2026 Vice Chair.

- Dr. Swanson shares that Dr. Sonia Pal's successor was appointed, and the Commission needs to elect a new vice chair.
- Carolin Spice is nominated for vice chair.
- Dr. Yu is nominated for vice chair, but he previously requested not to be considered.
- There is a motion to vote for Carolin Spice as the vice chair of the Commission.
- The motion is moved and seconded.
- A vote is taken and passes unanimously.

14. OTHER

14.1. The Commission may review the active committee list.

- Ms. Gardner notes the recent changes in commission members and asks for committee volunteers.
- Dr. Strong volunteers for the Expanded Function Dental Auxiliary (EFDA) Committee, Educational Outreach Committee, Dental Collaboration Committee, Dental Inclusion Committee, and Continuing Competency Committee, and volunteers to chair the Dental Inclusion Committee.
- Dr. Ulmer volunteers for the EFDA Committee and Jurisprudence Examination Committee.
- Ms. Spice volunteers to chair the Jurisprudence Examination Committee.
- Ms. Harry volunteers to chair the EFDA Committee.
- Dr. Swanson appoints Dr. Strong, Ms. Spice, and Ms. Harry to chair the respective committees.

14.2. The Commission may vote to approve an FAQ about on-site evaluators.

- Dr. Swanson presents the FAQ about on-site evaluators and asks the Commission for comments.
- No comments are received.
- There is a motion to adopt the FAQ as presented.
- The motion is moved and seconded.
- A vote is taken and passes unanimously.

14.3. Heather Carter, Assistant Attorney General, may discuss emergency scenario drills.

- Ms. Carter discusses whether emergency scenario drills performed during an on-site inspection can count toward the requirements in WAC 246-817-774(5)(d).

- Ms. Carter shares that the emergency scenario drills performed during an on-site inspection are a separate requirement from the emergency scenario drills required in WAC 246-817-774.
- Ms. Carter encourages the Commission to decide what the intention was during rulemaking, and to determine whether emergency scenario drills performed during an on-site inspection can count toward the requirements in WAC 246-817-774.
- Dr. Yu shares that if the emergency scenario drills are performed during an on-site inspection, they should be able to count towards the requirement.
- Trish Flaig, WSDA, states that the WSDA Regulatory Affairs Committee is strongly opposed to having the emergency scenario drills required for on-site inspections as an additional requirement, and notes the difficulty of calibrating volunteer evaluators.
- Ms. Carter suggests creating an FAQ once the Commission makes a final decision.
- Dr. Yu responds to Ms. Flaig's statement, noting that the volunteer evaluators must use the Commission's approved on-site inspection form, which includes emergency scenario drills.
- Dr. Swanson asks the Commission to discuss whether emergency scenario drills performed during an on-site inspection can count toward the emergency scenario drills required in WAC 246-817-774.
- Ms. Gardner reads a comment from Dr. Katharine Christian, a Seattle dentist, stating that she agrees that drills done during inspections should count toward the requirement.
- Dr. Anthony Fan, an anesthesiologist, agrees that inspections should count toward the requirement.
- There is a motion to allow emergency scenario drills performed during an on-site inspection to count toward the emergency scenario drills required in WAC 246-817-774(5)(d).
- The motion is moved and seconded.
- A vote is taken and passes unanimously.
- Ms. Gardner shares that she will work with Ms. Carter on an FAQ and bring it to the next business meeting for approval.

14.4. Correspondence from Anthony Fan, MD.

- Dr. Fan asks the Commission what routes there are for physician anesthesiologists to supervise dental anesthesia assistants in Washington State.
- Ms. Carter shares that the statutes that created the dental anesthesia assistant credential are specific to oral and maxillofacial surgeons and dental anesthesiologists who have a general anesthesia permit, as they are the only two dental specialties with a general anesthesia permit who can delegate and supervise dental anesthesia assistants.

- Ms. Carter shares that statute requires dental anesthesia assistant applicants to submit a copy of the supervising dentist's general anesthesia permit, and any changes would require legislative action.
- Dr. Fan states that dental statutes do not clearly define a dental anesthesiologist, and he would like to apply for a general anesthesia permit.
- Ms. Carter shares that dental anesthesiology is a specialty within dentistry, and the Commission can only issue general anesthesia permits to dentists and not physicians.
- Dr. Yu discusses how the Dental Commission has regulatory authority over dental anesthesia assistants, but not over physician anesthesiologists or certified registered nurse anesthetists.
- Ms. Spice asks about the possibility of assigning this topic to a subcommittee.
- Mr. Bronoske Jr. reiterates that any dental anesthesia assistant supervision changes would require legislative action.
- Ms. Carter shares that the Medical Commission has a rule about physicians providing anesthesia in a dental setting, and reiterates that changes to dental anesthesia assistant supervision would require legislative action.
- Dr. Fan asks if physician anesthesiologists are required to perform the on-site inspections required for dentists who hold a general anesthesia permit.
- Mr. Bronoske Jr. notes that dental rules regulate dentists, not physicians.
- Dr. Swanson discusses the contract that must be in place when working with a non-dentist anesthesia provider in a dental setting.

14.5. Correspondence from Nissreen Ayyad, MPH.

- Dr. Swanson acknowledges the correspondence from Nissreen Ayyad, MPH.

15. COMMISSION ON DENTAL ACCREDITATION (CODA)

15.1. The Commission may vote to approve representatives for the University of Washington School of Dentistry AEGD initial CODA accreditation site visit – December 2025.

- Ms. Gardner shares that CODA is requesting two volunteers as potential representatives to participate in the University of Washington School of Dentistry AEGD initial CODA accreditation site visit in December 2025, and the University of Washington School of Dentistry will select one individual to participate.
- Ms. Harry volunteers to be a representative.
- Dr. Ulmer volunteers to be a representative.
- There is a motion to submit Ms. Harry and Dr. Ulmer as the representatives for the University of Washington CODA site visit.
- The motion is moved and seconded.
- A vote is taken and passes unanimously.

16. ACKNOWLEDGMENTS

16.1. The Commission will acknowledge members' dedication and service to the Commission.

- Dr. Swanson thanks Dr. Pal and Dr. Tiffany Bass for their time with the Commission and welcomes the new commissioners to the Commission.
- Ms. Gardner shares that Dr. Bass has been appointed as a pro tem member.

17. FUTURE BUSINESS

- No future business is discussed.

18. ADJOURN

- The meeting is adjourned at 12:06 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

Date