



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

**WASHINGTON DENTAL COMMISSION
BUSINESS MEETING MINUTES
Friday, March 6, 2026**

MEMBERS PRESENT

Bryan Swanson, DDS, Chair
Erich Jurges, DDS
Marlynne Fulton, Public Member
Rayna Strong, DMD
Nisha Sharoff, DDS
Seung Yu, DDS
Ji Choi, DDS
Evelyn Harry, EFDA
Srinivasa R. Chandra, MD, BDS
Rama Oskouian, DMD
Ashley Ulmer, DDS
McKinley Rainey, Public Member
Miryam Nossa, EFDA
David Carsten, DDS, Pro Tem
Member

STAFF PRESENT

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
Jane Zepp, Credentialing Supervisor
Mikala Lord, Policy Analyst
Adriana Barcena, Program Manager

MEMBERS ABSENT

Minou Karbakhsch, DDS
Carolin Spice, Public Member,
Vice Chair
Sarah Khan, DMD
Cheon Joo Yoon, DDS

OPEN SESSION

OPEN SESSION – 10:01 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 4.6 – Chapter 246-12 WAC, Administrative procedures and requirements for credentialed health care providers.
- 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 January 16, 2026, business meeting minutes.

- There is a motion to approve the January 16, 2026, business meeting minutes.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

2. RULES HEARING – WAC 246-817-135, Dental licensure without examination—Eligibility and application requirements, and WAC 246-817-160, Graduates of nonaccredited schools. Filed on January 7, 2026, as WSR 26-03-002.

2.1. The Commission will consider public comment and adoption of proposed rules regarding removing requirements for federal or state tax numbers when applying for dental licensure without an examination, and the educational and training pathways that graduates of non-accredited schools or programs must complete to obtain comprehensive dental training to meet minimum clinical competency requirements.

- The hearing begins at 10:05 a.m. and is held via Zoom webinar and in person at the Department of Health, TC2 Room 166, 111 Israel Road SE, Tumwater, WA 98501-5414.
- Dr. Swanson explains that the Commission is proposing amendments to WAC 246-817-135 to remove the requirement of providing federal and state tax numbers to protect an applicant’s privacy and security, as it is not necessary data to protect public health when meeting licensing requirements.
- Dr. Swanson shares that the Commission is proposing amendments to WAC 246-817-160 to better explain the educational and training pathways for graduates of non-accredited dental schools to ensure they meet minimum clinical competency requirements, and provides an overview of the proposed amendments.
- Dr. Swanson opens the rules hearing for public testimony.
- Dr. Andre Ritter with the University of Washington (UW) School of Dentistry testifies in opposition to the rule as drafted, stating that reducing training from two years to one year for graduates of non-accredited programs risks allowing

graduates who are not yet ready to practice safely and independently to be eligible for licensure in Washington, and that specialty program graduates should remain eligible for licensure.

- Trish Flaig, Washington State Dental Association (WSDA), testifies in opposition to the proposed rule and echoes Dr. Ritter's comments, emphasizing that two years of additional training should remain the requirement for graduates of non-accredited schools, and that specialty residency graduates should remain eligible for licensure.
- Dr. Bryan Edgar testifies in opposition to the proposed rule, shares his professional experience, encourages the Commission to keep a two-year requirement in place, and notes that a General Practice Residency (GPR) or Advanced Education in General Dentistry (AEGD) requirement would be burdensome to dentists pursuing advanced specialty training pathways.
- Ms. Gardner reads a written comment from Dr. Milda Chmieliauskaite, a licensed dentist in the state of Washington and board-certified oral medicine specialist who is the current Director of the Oral Medicine Graduate Program at UW, and emphasizes that Dr. Chmieliauskaite is testifying in a personal capacity.
- Dr. Chmieliauskaite's comment opposes reducing training requirements to one-year GPR or AEGD programs and removing licensure eligibility for specialty program graduates, noting it could reduce access to specialized dental care.
- Dr. Mark Drangsholt, professor and Chair of Oral Medicine at UW, opposes the rule changes due to the undersupply of oral medicine and oral facial pain specialists in Washington State and adjoining states, noting most program applicants are from outside of the United States, which could limit the ability to train qualified international dentists.
- The hearing is concluded at 10:24 a.m.
- Ms. Gardner asks if written comments that were received after the comment period closed on February 24, 2026, can be included in the rule package.
- Ms. Carter states that the comments received after the comment period closed will not be officially considered, and notes that the late comments echo other comments that the Commission received.
- Dr. Swanson opens the discussion to the Commission.
- Dr. Carsten asserts that there have been many opportunities for public input during the rulemaking process and emphasizes the need for safeguards to protect the public by ensuring that dentists practicing in Washington State have adequate general dental clinical training.
- Dr. Carsten encouraged commissioners and interested parties to participate in further rulemaking if the Commission does not adopt the current proposed rule language.
- Dr. Oskouian states that the Commission's primary role is to protect the public and that specialty training alone should not be considered as a substitute for a Commission on Dental Accreditation (CODA) accredited predoctoral program

and notes that specialty programs are designed to provide focused training within a narrow area of dentistry, not comprehensive preparation within the full scope of general dentistry practice.

- Dr. Oskouian states that the purpose of licensure standards is to ensure that every dentist practicing in Washington has met consistent and verified clinical training requirements and emphasizes the importance of prioritizing protecting the public.
- Dr. Ulmer states that a GPR or an additional two years of predoctoral training does not replace a full four-year CODA-accredited predoctoral dental education, and that a single dental license pathway does not solve the problem between general dentistry and dental specialty training.
- Dr. Yu agrees with the comments from the UW that the proposed rule language should not be adopted, that reducing additional training from one to two years will reduce the clinical exposure, and suggests creating a non-examination pathway standard or specialty designation for graduates of specialty programs.
- Dr. Chandra speaks from his personal and professional experience and emphasizes the serious nature of this topic, noting that not all dental schools or GPR and AEGD programs are equal to UW's standards and that an additional two years of training should not allow someone to become a dental specialist in Washington.
- Mr. Rainey asks whether the rule package could be voted on separately and asks if the proposed rule language could be amended to include the specialty programs that were mentioned in the written comments and meet the criteria for licensure.
- Ms. Carter explains that the rule package cannot be separated since it was proposed as a single rule package.
- Dr. Carsten states that the legislature does not allow the Commission to issue specialty licenses, and patient harm has occurred when dentists who had specialty training that did not include general dentistry training strayed outside of their specialty.
- Dr. Yu states that the expectation for specialty-trained dentists is that they will not perform general dentistry procedures, and a GPR or AEGD would be a waste of time and resources.
- Dr. Swanson notes that RCW 18.32.040 includes pediatric dental residency, asserts that prosthodontic residencies are more rigorous than an AEGD, and asks if this rule package applies to dentists applying for licensure without an examination pathway.
- Ms. Gardner explains that WAC 246-817-135 is the licensure without an examination pathway, and WAC 246-817-160 is for graduates of non-accredited schools.
- Ms. Carter adds that after graduates of non-accredited schools have completed the additional training, they must still pass an examination or take an additional

one-year residency to skip the examination, which is specified in RCW 18.32.040.

- Dr. Yu discusses a potential loophole that could be created by allowing a dentist who has received specialty training in another country to obtain a dental license by only completing a CODA-accredited GPR program, and then practicing as a specialist in Washington.
- Dr. Strong expresses concern over replacing exams with residency training.
- Ms. Carter explains that the legislature passed legislation that allows specific residency programs to be taken in lieu of examination, and that the Commission does not have authority to change that.
- Dr. Chandra asks if UW has two-year GPR and AEGD programs and if the second-year programs are always filled.
- Mr. Bronoske Jr. suggests sending this rule back to the committee for further discussion.
- Dr. Edgar discusses the differences between GPR and AEGD programs versus two-year international dental training programs, and notes that many GPR and AEGD residents do not complete a second year.
- Dr. Edgar states that one of the American Dental Association licensure requirements for foreign-trained dentists is to take two years of training at a dental school and have the dean certify that they have obtained equivalent training to a four-year dental program graduate.
- Dr. Choi discusses other state licensure requirements and notes that Washington State currently allows two years of specialty training for licensure, and a dental license in Washington State allows the practice of general dentistry.
- Ms. Nossa suggests having the committee consider specifying international training through UW and whether AEGD graduates must take an exam.
- Dr. Swanson summarizes Dr. Drangsholt's comment that states UW's Oral Medicine Graduate Program includes general dentistry in the Dental Education in the Care of Persons with Disabilities (DECOD) program.
- There is a motion to send the proposed rule package back to the Continuing Competency Committee for further discussion.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.
- Ms. Gardner and Ms. Carter reiterate that rulemaking workshops and committee meeting notifications are distributed via GovDelivery and are posted on the Commission's webpage, and encourage commissioners and the public to participate.

3. LEGISLATIVE UPDATE

3.1. The Commission will receive an update regarding the 2026 legislative session.

- Ms. Gardner shares that the 2026 legislative session ends on March 12, 2026, and the bills that have been monitored by program staff appear to have died.

4. RULES UPDATE

4.1. 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.

4.2. Chapter 246-819 WAC, Dental therapists.

- Ms. Gardner shares that a CR-101 was filed with the Code Reviser as WSR 26-05-023 on February 10, 2026.
- A GovDelivery notification was sent to interested parties on February 12, 2026.

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

- Ms. Gardner shares that a CR-103 rule package is currently in the internal review process.
- Once completed and published with the Code Reviser, the rule will take effect 31 days after filing.

4.4. WAC 246-817-773, Continuing education for dentists administering sedation.

- Ms. Gardner shares that a CR-103 was filed with the Code Reviser as WSR 26-05-070 on February 17, 2026.
- A GovDelivery notification was sent to interested parties on February 19, 2026, and the rule is effective March 20, 2026.

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

- Ms. Gardner shares that the policy team notified program staff that this rule is eligible for expedited rulemaking instead of standard rulemaking.
- There is a motion to approve a CR-105 for WAC 246-817-120.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.
- There is a motion to approve a CR-103 for WAC 246-817-120 if there are no objections from the public during the comment period.
- There is a motion to approve the draft rule language in WAC 246-817-120 as presented.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

4.6. Chapter 246-12 WAC, Administrative procedures and requirements for credentialed health care providers.

- Ms. Gardner shares that the Department of Health (Department) is proposing amendments to Chapter 246-12 WAC to clarify existing language, correct typographical errors, and make the rules consistent with modern standards, current law, and department procedures.
- A CR-105 was filed with the Code Reviser as WSR 26-05-053 on February 13, 2026, and a GovDelivery notification was sent to interested parties on February 23, 2026.

5. EXPANDED FUNCTION DENTAL AUXILIARY (EFDA) CLINICAL RESTORATIONS EXAMINATION

5.1. The Commission may vote to approve the American Board of Dental Examiners (ADEX) examination for the EFDA clinical restorations examination.

- Ms. Gardner shares that when CDCA-WREB-CITA merged to form ADEX, the legacy Western Regional Examining Board (WREB) restorative examination became the ADEX dental hygiene restorative examination.
- Ms. Nossa asks if this examination is for out-of-state EFDAs applying for licensure in Washington State.
- Ms. Gardner shares that although the examination has not changed, it needs to be approved under the new name since it was previously approved by the Commission under the WREB examination name.
- There is a motion to formalize the acceptance of the ADEX dental hygiene restorative examination as an approved clinical restoration examination for EFDAs.
- The vote is moved and seconded.
- A vote is taken and unanimously passes.

6. PACIFIC NORTHWEST UNIVERSITY OF HEALTH SCIENCES (PNWU)

6.1. The Commission may discuss an outreach opportunity at the PNWU School of Dental Medicine.

- Dr. Swanson shares that PNWU requested that this presentation be delayed to 2028.

7. EDUCATIONAL OUTREACH COMMITTEE– Committee meeting held on January 20, 2026, and March 2, 2026 – Marlynne Fulton, Public Member, Chair

- Ms. Fulton shares that the committee approved the April retreat agenda and July newsletter article topics.
- Ms. Fulton asks new commissioners to submit a short bio for the newsletter.
- Dr. Swanson and Ms. Fulton discuss having all commissioners submit a bio to be included in future newsletter publications.

8. INDEPENDENT COMMISSION COMMITTEE – Committee meetings held on February 2, 2026, and February 24, 2026 – Dr. Rama Oskouian, Chair

- Dr. Oskouian shares that the committee is working on reviewing the Commission’s joint operating agreement, while continuing to discuss exploring an independent structure.
- Dr. Oskouian shares that Mr. Bronoske Jr. is drafting a concept paper to submit to the Department leadership regarding the Commission’s name change.

9. DENTIST AND DENTAL HYGIENIST COMPACT (DDH COMPACT) – DDH Compact Commission Meeting held on February 19, 2026 – Catharine Roner-Reiter, Supervising Staff Attorney

- Ms. Roner-Rieter shares that the DDH Compact Commission held a hearing for background checks and clinical assessment.
- Ms. Roner-Reiter shares that the DDH Compact Commission adopted the background check rule.
- The background check rule requires participating states to run a federal background check on all license holders, and participating states have six years to implement this process.
- Ms. Roner-Reiter shares that Washington State currently utilizes federal background checks for out-of-state applicants and follows a different process for in-state applicants, emphasizing the importance of notifying all existing license holders of the requirement to complete a federal background check upon license renewal.
- Ms. Roner-Reiter shares that the clinical assessment rule met substantial pushback for being too narrow, limiting, and exclusionary.
- Ms. Roner-Reiter shares that the proposed rule language would require current license holders who passed a Dental Licensure Objective Structured Clinical Examination (DLOSCE) to take an additional hands-skills assessment and did not address Post-Graduate Year (PGY-1) pathways.
- The clinical assessment rule did not pass and was returned to the DDH Rules Committee for further discussion.
- Ms. Roner-Reiter encourages interested parties to submit public comments or testimony at the rules hearing.
- Ms. Roner-Reiter shares that the DDH Compact Commission held elections for the Executive Committee.

10. DENTAL ANESTHESIA

10.1. The Commission may discuss dental sedation/anesthesia and public safety.

- Dr. Yu shares that there was a bill introduced in the 2026 legislative session regarding dental anesthesia and public safety concerns, and proposes that the Dental Anesthesia Committee proactively discuss the following topics:
 - Strengthening anesthesia regulation and oversight.
 - Reviewing data on audits if they are being performed.
 - Equally regulating all anesthesia providers who provide anesthesia in dental offices, including physician anesthesiologists and certified registered nurse anesthetists (CRNAs), and discussing possible scenarios where a dentist may be held liable.
 - Requiring dental anesthesia permits for non-dentist anesthesia providers.
 - Carefully reviewing one to two-week non-CODA sedation/anesthesia courses and potentially requiring annual Dental Commission approval.
 - Historical data on anesthesia safety and potentially publishing annual public data related to anesthesia.
- Dr. Swanson asks for a motion to assign this work to the Dental Anesthesia Committee and emphasizes that some of these topics may require legislation.

- There is a motion to assign these topics to the Dental Anesthesia Committee.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

10.2. Correspondence from the Washington State Dental Association.

- Dr. Swanson discusses correspondence from WSDA and their request to hold a special meeting to discuss the shortage of diazepam.
- Dr. Swanson recommends midazolam as an alternative, notes that there is not a current shortage of midazolam, and asks Dr. Yu and Dr. Chandra for feedback.
- Dr. Yu agrees that midazolam is an appropriate alternative for diazepam and advises against allowing moderate sedation permit holders to use ketamine.
- Dr. Chandra seconds Dr. Yu's comments and shares that Valium is not currently admitted as a safety medication for individuals with any amount of neurocognitive deficiency, due to their deterioration postoperatively.
- Dr. Edgar notes that a WSDA member was concerned with the diazepam shortage.
- Dr. Swanson asks Dr. Edgar if WSDA would like a formal response.
- Dr. Edgar shares that a formal response is not necessary; he will share the Commission's response.
- Ms. Gardner reads a comment from Ms. Flaig regarding concerns from clinicians where midazolam alone is insufficient, and if the patient does not achieve or maintain the appropriate level of sedation, providers would have no alternative available to titrate except fentanyl.
- Dr. Swanson suggests adding midazolam rather than opioids if the patient is waking up and notes that midazolam is safer than Valium because of the shorter half-life.
- Dr. Yu discusses the clinical variability of patients and acknowledges the clinical dilemma.

11. REGIONAL/NATIONAL ORGANIZATIONS

11.1. Central Regional Dental Testing Service (CRDTS) –The Commission may vote to approve a CRDTS representative.

- Dr. Swanson asks for a volunteer to replace Dr. Khan as the Commission's CRDTS representative.
- Mr. Bronoske Jr. reviews the typical commitment for the CRDTS representative.
- Dr. Chandra volunteers to be the Commission's representative.
- There is a motion to appoint Dr. Chandra as the Commission's CRDTS representative.

11.2. Correspondence from the American Board of Dental Examiners (ADEX).

- Dr. Swanson acknowledges that the Commission received the Report of the ADEX Licensure Examinations.

11.3. Commission on Dental Accreditation (CODA) – Providence Sacred Heart General Practice Residency (GPR) update.

- Ms. Gardner shares that the Commission received a notification from CODA that the Providence Sacred Heart Medical Center's GPR in Spokane will close following the graduation of its last class in June 2026.

11.4. CODA – Renton Technical College Dental Assisting Program update.

- Ms. Gardner shares that the Commission received notification from CODA that the Renton Technical College Dental Assisting Program voluntarily discontinued its CODA Accreditation with the December 2025 graduating class and will still offer a non-CODA-accredited dental assisting program.

12. PUBLIC DISCLOSURE –The Commission may consider requests for approval from professional associations or educational organizations to receive lists and labels.

12.1. ProvenBase.

- Ms. Gardner shares that the Commission received a list and labels request from ProvenBase, and that the organization did not indicate that it meets the definition of a professional association or educational organization.
- There is a motion to deny the list and labels request from ProvenBase.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

13. PROGRAM UPDATE

13.1. Staffing update.

- Mr. Bronoske Jr. shares that the Department is currently in the hiring process for an Executive Director.
- Interviews will begin next week, and the interview panel will include members from the Commission and the Dental Hygiene Examining Committee.

13.2. Administrative announcements.

- Mr. Bronoske Jr. notes a perceived rise in direct outreach from licensees involved in disciplinary action and advises commission members not to engage in discussion and to promptly forward any communication directly to staff for handling.
- Mr. Bronoske Jr. informs the Commission of a new process for when commission members are scheduled to testify at legislative hearings.
- Commission members should contact the Executive Director and/or the Assistant Attorney General to inform them that they intend to testify. When testifying, commission members should also specifically state that they are a member of the Commission; however, they are testifying on their own and not as a commission member.

13.3. Recruitment update.

- Ms. Gardner shares that the four commissioners who have appointment terms ending in June are seeking reappointment, and the appointment package has been submitted to the Department's Executive Team for review.

13.4. June 2026 business meeting location.

- Ms. Gardner shares that the Commission previously discussed holding the June 2026 business meeting in Eastern Washington, and the program was recently notified that travel approval is limited to the Executive Director, Program Manager, and one administrative staff member.
- Dr. Swanson asks about the cost of holding a meeting outside of Tumwater in Western Washington.
- Mr. Bronoske Jr. confirms that the cost would be higher to hold a meeting offsite versus in Tumwater.
- Dr. Edgar notes that the Commission has historically held business meetings near SeaTac Airport.
- The Commission discusses business meeting locations and decides to hold the June 2026 business meeting in Tumwater.
- There is a motion to hold the June 2026 business meeting in Tumwater, Washington.
- The motion is moved and seconded.
- A vote is taken and unanimously passes.

14. PUBLIC SERVICE ANNOUNCEMENT – The Commission may discuss scams targeting healthcare professionals.

- Mr. Bronoske Jr. informs the Commission that there appears to be an increase in scam communication directed at healthcare providers.
- These communications are becoming increasingly complex, so everyone should be extra cautious.

15. FUTURE BUSINESS

- No future business is discussed.

16. ADJOURN

- The meeting is adjourned at 12:07 p.m.

Submitted by:

Debbie Gardner, Program Manager
Washington Dental Commission

Approved by:

Bryan Swanson, DDS, Chair
Washington Dental Commission

On file _____
Signature

On file _____
Signature

Date

Date