



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

WASHINGTON DENTAL COMMISSION
BUSINESS MEETING MINUTES
Friday, April 24, 2026

MEMBERS PRESENT

Bryan Swanson, DDS, Chair
Carolyn Spice, Public Member, Vice Chair
Marlynnne Fulton, Public Member
Rayna Strong, DMD
Cheon Joo Yoon, DDS
Sarah Khan, DMD
Evelyn Harry, EFDA
Srinivasa R. Chandra, MD, BDS
Rama Oskouian, DMD
Ashley Ulmer, DDS
McKinley Rainey, Public Member
Minou Karbakhsch, DDS
Erich Jurges, DDS
Ji Choi, DDS
Seung Yu, DDS
David Carsten, DDS, Pro Tem
Member

STAFF PRESENT

Kimberly Sanchez, Executive Director
Bruce Bronoske Jr., Interim Executive
Director
Debbie Gardner, Program Manager
Cassandra Gerard, Administrative
Assistant
Catharine Roner-Reiter, Supervising Staff
Attorney
Heather Carter, Assistant Attorney
General
Kitty Einert, Program Manager
Haylie Kang, Policy Analyst
Sarah Miczynski, Credentialing
Supervisor

MEMBERS ABSENT

Miryam Nossa, EFDA
Nisha Sharoff, DDS

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 introduced commission members and staff.
 - 1.2. Public Comment.

- Dr. Swanson opened the floor for public comment.
 - No comment received.
- 1.3. Approval of agenda.
- A motion was made to approve the agenda.
 - The motion was moved and seconded.
 - A vote was taken and unanimously passed.
- 1.4. Approval of March 6, 2026, business meeting minutes.
- A motion was made to approve the March 6, 2025, business meeting minutes.
 - The motion was moved and seconded.
 - A vote was taken and unanimously passed.

2. RULES UPDATE

- 2.1. Chapter 246-817 WAC, Dentist and dental hygienist compact.
- Ms. Gardner shared that a CR-101 was filed with the Code Reviser as WSR 24-21-097 on October 17, 2024.
- 2.2. WAC 246-817-135, Dental licensure without examination – Eligibility and application requirements, and WAC 246-817-160, Graduates of non-accredited schools.
- Item 2.2 was addressed under Item 5.2 of the agenda.
- 2.3. WAC 246-817-120, Examination content.
- Ms. Gardner shared that a CR-105 was filed with the Code Reviser as WSR 26-08-057 on March 27, 2026.
 - A GovDelivery notification was sent to interested parties on March 30, 2026.
- 2.4. WAC 246-817-990, Dentist fees and renewal cycle.
- Ms. Gardner shared that a CR-101 was filed with the Code Reviser as WSR 26-07-017 on March 9, 2026.
 - A GovDelivery notification was sent to interested parties on March 11, 2026.
- 2.5. Chapter 246-819 WAC, Dental therapists.
- Ms. Einert shared that a CR-101 was filed with the Code Reviser as WSR 26-05-023 on February 20, 2026.
 - A GovDelivery notification was sent to interested parties on February 23, 2026.
- 2.6. Chapter 246-814 WAC, Access to dental care for children.
- Ms. Einert shared that the CR-103 filing date is tentatively scheduled for May 8, 2026.

3. RULE PETITION

- 3.1. The Commission may consider a rule petition from Bill Osmunson, DDS, MPH.
- Dr. Osmunson presented his petition to the Commission to consider rulemaking to phase out dental amalgam and raised concerns about informed consent and patient safety.

- Ms. Carter clarified that after a rule petition is received, the Commission has 60 days to respond, and it can decide whether to open rulemaking or deny the rule petition and state the reason for the denial.
- Ms. Carter notes that the rule petition request is asking the Commission to restrict the use of dental amalgam in children, pregnant and nursing women, and to require documentation of clinical necessity.
- Trish Flag, Director of Regulatory and Compliance Strategy with the Washington State Dental Association (WSDA), states that WSDA would oppose rulemaking that limits the use of amalgam, asserting that amalgam is safe to use on patients.
- Dr. Carsten noted that amalgam use is already declining and supported leaving it up to the practitioner's judgment, and suggested considering how rulemaking would impact access to care.
- Dr. Yu inquired about how rulemaking would impact the use of amalgam in underserved areas.
- Dr. Jurges stated that amalgam use is declining, even in rural and underserved areas.
- Dr. Strong notes that Medicaid covers amalgam, composite, and glass ionomer restorations.
- Dr. Karbakhsch opposed the rule petition and emphasized that all dental materials have risks and benefits, which the clinician should assess.
- Dr. Yoon reiterated that amalgam is rarely used, especially by dental residents and recent dental graduates.
- Dr. Chandra supported letting amalgam phase out naturally rather than imposing requirements in rule.
- A motion was made to deny the rule petition because the clinical use of amalgam is already declining and will continue to disappear as clinicians decide not to use it.
- The motion was moved and seconded.
- A vote was taken and unanimously passed.
- Ms. Carter suggested that the Commission discuss the additional request from Dr. Osmunson to provide guidance or an interpretive statement on the use of amalgam.
- The Commission discussed the request and assigned reviewing current guidelines on the use of amalgam to the Continuing Competency Committee.
- A motion was made to assign the review process to the Continuing Competency Committee.
- The motion was moved and seconded.
- A vote was taken and unanimously passed.

4. JURISPRUDENCE EXAMINATION COMMITTEE – Committee meeting held on March 17, 2026 – Carolin Spice, Public Member, Chair.

4.1. The Commission may vote to approve jurisprudence examinations and core questions.

- Ms. Spice explained that the Commission has four jurisprudence (JP) exams with 50 questions each, including 25 core questions in each JP exam, plus 25 additional questions that are different in Exam 1-4.
- Ms. Spice shared that the committee is recommending separating the core questions from the JP exams and rotating Exam 1-4 annually for efficiency.
- The Commission discussed the updated JP exam structure, core questions, and Exam 1-4.
- A motion was made to approve the updated exam structure, core questions, and Exam 1-4.
- The motion is moved and seconded.
- A vote was taken and unanimously passed.
- A motion was made to approve rotating the JP exams annually.
- The motion was moved and seconded.
- A vote was taken and unanimously passed.

5. CONTINUING COMPETENCY COMMITTEE – Committee meeting held on March 25, 2026 – Dr. Cheon Joo Yoon, Chair

5.1. The Commission may vote to approve updates to the *Dentist Standard of Care- Radiographs* interpretive statement.

- Dr. Yoon presented updates to the *Dentist Standard of Care- Radiographs* interpretive statement, which include statements from the American Dental Association's (ADA) 2024 and 2026 recommendations.
- Dr. Karbakhsch asked whether clear pediatric-specific guidance is included in the interpretive statement or if it should be a separate recommendation.
- Dr. Yoon responded that the *Dentist Standard of Care- Radiographs* interpretive statement includes general recommendations, not pediatric-specific recommendations.
- Ms. Gardner noted that the interpretive statement includes the ADA's 2026 recommendations to consider the patient's age, dental development, and disease risk.
- Dr. Carsten noted that the updates to the *Dentist Standard of Care- Radiographs* interpretive statement are limited to the ADA's updated recommendations.
- A motion was made to approve the updated *Dentist Standard of Care- Radiographs* interpretive statement.
- The motion was moved and seconded
- A vote was taken and unanimously passed.

5.2. The Commission may vote to approve separate rule packages for WAC 246-817-135 and WAC 246-817-160.

- Ms. Gardner explained that the Commission could keep the rules combined and continue with rulemaking or separate the rules into individual rule packages.

- Ms. Gardner noted that if the rules are separated, the Commission can vote to approve the proposed amendments in WAC 246-817-135 since no public concerns were raised during the comment period, and that separating the rule package will require starting the rulemaking process over for WAC 246-817-160.
 - Ms. Carter explained that the Commission can choose to adopt the proposed rule language in WAC 246-817-135 to remove the requirement for federal or state tax numbers and continue the rulemaking process separately for WAC 246-817-160.
 - Dr. Carsten recommended separating the rules since they address different issues, including a controversial part in WAC 246-817-160.
 - A motion was made to separate WAC 246-817-135 and WAC 246-817-160 into separate rule packages.
 - The motion was moved and seconded
 - A vote was taken and unanimously passed.
- 5.3. The Commission may vote to approve proposed amendments to WAC 246-817-135 regarding removing requirements for federal or state tax numbers when applying for dental licensure without an examination.
- A motion was made to approve the proposed amendments to WAC 246-817-135.
 - The motion was moved and seconded
 - A vote was taken and unanimously passed.
- 5.4. The Commission may vote to approve a CR-101 for WAC 246-817-160.
- A motion was made to approve filing a CR-101 for WAC 246-817-160.
 - The motion was moved and seconded.
 - A vote was taken and unanimously passed.
 - Dr. Yoon announced that he is stepping down as Chair of the Continuing Competency Committee and nominated Dr. Carsten as Chair.
 - Dr. Swanson asked if any other members of the Continuing Competency Committee have an interest in being the Chair.
 - No other committee members volunteered.
 - Dr. Swanson appointed Dr. Carsten as Chair of the Continuing Competency Committee.

6. INDEPENDENT COMMISSION COMMITTEE – Committee meeting held on April 20, 2026 – Dr. Rama Oskouian, Chair

- Dr. Oskouian shared that the Independent Commission Committee continues to discuss pursuing independence versus maintaining the Commission’s partnership with the Department of Health, and that the canceled meeting will be rescheduled.

7. DENTIST AND DENTAL HYGIENIST COMPACT (DDH COMPACT) RULES COMMITTEE – Committee meeting held on April 1, 2026 – Catharine Roner-Reiter, Supervising Staff Attorney

- Ms. Roner-Reiter reported that the DDH Compact Rules Committee discussed a revised draft clinical assessment rule, presented the revised draft clinical assessment rule language to the Commission, invited feedback, and encouraged participation at the May 18, 2026, DDH Compact Full Commission meeting.
- Dr. Carsten noted that the revised draft clinical assessment rule may be a good compromise due to the new agreement between the American Board of Dental Examiners (ADEX) and the ADA's Dental Licensure Objective Structured Clinical Examination (DLOSCE), which will require a psychomotor component and make it easier for more states to join the compact.
- Ms. Roner-Reiter and Dr. Carsen discussed Postgraduate Year 1 (PGY1) residencies as a valid licensure pathway.
- The Commission thanked Ms. Roner-Reiter for her work as Washington's representative for the DDH Compact.

8. REGIONAL/NATIONAL ORGANIZATIONS

8.1. Washington Physicians Health Program (WPHP) Statistical Report Q4 2025.

- Dr. Swanson asked if there were questions on the WPHP Q4 report; none were raised.

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

- Ms. Gardner shared that the Commission received two items of correspondence from ADEX: (1) information about becoming an examiner and the examination process, and (2) notification of the agreement between ADEX and ADA's DLOSCE, and noted that ADEX may provide the Commission with a presentation about the agreement at the next business meeting.

8.3. Correspondence from the Dental Assisting National Board (DANB).

- Ms. Gardner shared that the Commission received a request from DANB to provide feedback on the drafted Orthodontic Assisting component of the Dental Assisting Profession Model.
- Ms. Carter advised the Commission that the request from DANB is informational and does not require an official response, and may be considered as a form of lobbying.
- The Commission agreed to review the information but not issue a formal response.

9. PROGRAM UPDATE

9.1. Staffing update.

- Ms. Sanchez introduced herself as the new Executive Director and shared team updates, including role transitions and new staff additions, and expressed commitment to support the Commission's work.

10. FUTURE BUSINESS

- No future business was discussed.

11. ADJOURN

- The meeting was adjourned at 10:57 a.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
