Washington State Department of HEALTH

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TDD Relay: 711

WASHINGTON DENTAL COMMISSION
BUSINESS MEETING MINUTES
Friday, September 4, 2026

MEMBERS PRESENT
Bryan Swanson, DDS, Chair
Carolin Spice, Public Member, Vice Chair
Marlynne Fulton, Public Member
Rayna Strong, DMD
McKinley Rainey, Public Member
Minou Karbakhsch, DDS
Erich Jurges, DDS
Seung Yu, DDS
Ashley Ulmer, DDS
Rama Oskouian, DMD
Ji Choi, DDS
Cheon Joo Yoon, DDS
Miryam Nossa, EFDA
Nisha Sharoff, DDS

STAFF PRESENT
Kimberly Sanchez, Executive Director
Bruce Bronoske Jr., Program Manager
Debbie Gardner, Program Manager
Sherri Stratton, Assistant Program Manager
Catharine Roner-Reiter, Supervising Staff Attorney
Heather Carter, Assistant Attorney General
Mikala Lord, Policy Analyst
Jeff Orwig, Finance Officer
Brandon Williams, Office of Health Professions Operations

MEMBERS ABSENT
Evelyn Harry, EFDA
Srinivasa R. Chandra, MD, BDS
Sarah Khan, DMD

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 introduced attending commission members and staff.

   1.2. Public comment
   - Dr. Swanson opened the floor for public comment.
   - Dr. Victor Barry thanked the Commission for withdrawing Dr. Strong's article from the Dental Newsletter, suggested that she submit the article as an

editorial to the Washington State Dental Association (WSDA), and encouraged the Commission not to reprint the article.

1.3. Approval of agenda.
- Dr. Swanson requested amending the agenda to include the addition of the following items:
- Item 3.1 – The Commission may discuss the structure of the Educational Outreach Committee.
- Item 10.3 – Correspondence from Shawna Sengara, DDS.
- Item 11.3 – Ms. Carter may provide the Commission with an administrative update.
- A motion was made to approve the amended agenda.
- The motion was moved and seconded.
- A vote was taken and unanimously passed.

1.4. Approval of July 24, 2026, business meeting minutes.
- A motion was made to approve the July 24, 2026, 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 the CR-102 process may begin after hearing more from the Compact Commission regarding rulemaking.

2.2. WAC 246-817-160, Graduates of nonaccredited schools.
- Ms. Gardner shared that the CR-101 was filed with the Code Reviser as WSR 26-16-013 on July 24, 2026.
- A notification was sent to interested parties on July 28, 2026.

2.3. WAC 246-817-990, Dentist fees and renewal cycle.
- Ms. Gardner shared that the Department of Health (Department) held a rules hearing on August 25, 2026, and there was one comment in support of this rule.
- This rule is now under review with the Secretary.

2.4. WAC 246-817-190, Dental assistant registration.
- Ms. Gardner shared that the CR-101 was filed with the Code Reviser as WSR 26-17-032 on August 11, 2026.
- A notification was sent to interested parties on August 18, 2026.

2.5. Chapter 246-819 WAC, Dental therapists.
- Mr. Bronoske Jr. shared that the purpose of this rule is to establish a new section to implement the general requirements for dental therapists to administer sedation: local anesthesia and nitrous oxide.
- The Dental Therapy Committee and Department held a rules workshop on August 20, 2026, and plan to hold more workshops.

3. **EDUCATIONAL OUTREACH COMMITTEE –** Committee meeting held on July 30, 2026 – Marlynne Fulton, Public Member, Chair
    - Ms. Fulton shared that the committee approved articles for the July newsletter and an article topic for the WSDA magazine.

3.1. The Commission may discuss the structure of the Educational Outreach Committee.

- Dr. Swanson discussed the current structure of the Educational Outreach Committee, which includes members from the Board of Denturist and Dental Hygiene Examining Committee, and possibly changing the structure to include only commissioners.
- Dr. Swanson emphasized that collaboration with members from the Board of Denturists and Dental Hygiene Examining Committee would still occur on the Dental Collaboration Committee.
- Ms. Fulton noted concerns with the potential change to the committee's structure and expressed her gratitude to the non-commission members for their contributions and dependability.
- Ms. Sanchez discussed the work of the committee as it relates to the Commission's business plan and offered to meet with Ms. Fulton to discuss the structure of the committee.
- Dr. Swanson suggested sending the discussion to the committee for further discussion with the other board and committee members; Dr. Strong and Mr. Rainey agreed.

4. **CREDENTIALING PRESENTATION** – Brandon Williams, Office of Health Professions Operations, will present to the Commission.
    - Mr. Williams provided the Commission with a presentation detailing credentialing data for the professions that are under the Commission's authority and answered questions from commissioners.
    - Ms. Sanchez discussed a discrepancy in the 2023-2025 Uniform Disciplinary Act (UDA) report relative to the current dentist license count and noted that the 2023-2025 UDA report included sedation permits in the total dentist license count.
    - Ms. Sanchez shared that the Department has a webpage titled *Healthcare in Washington* with current license counts by profession, and the next UDA report will include a correction.

5. **OPERATING BUDGET REPORT** - Jeff Orwig, Finance Officer, will present to the Commission.
    - Mr. Orwig presented the Commission's Operating Budget Report and answered questions from commissioners.

6. **REGIONAL/NATIONAL ORGANIZATIONS**

6.1. Central Regional Dental Testing Service (CRDTS) – Annual Meeting, August 28-29, 2026, Omaha, NE – Dr. Srinivasa R. Chandra
- This item was not discussed.

6.2. 2027 Pacific Northwest Dental Conference (PNDC) – The Commission may vote to approve a representative to present at the 2027 PNDC.
- Dr. Swanson asked for a volunteer to be a representative to present at the 2027 PNDC.
- Dr. Karbakhsch and Dr. Jurges volunteered.
- A motion was made to approve Dr. Karbakhsch and Dr. Jurges as representatives to present at the 2027 PNDC.
- The motion was moved and seconded.
- A vote was taken and unanimously passed.

7. ON-SITE INSPECTIONS

7.1. Heather Carter, Assistant Attorney General, may review WAC 246-817-775, On-site inspections.
- Ms. Carter reviewed WAC 246-817-775 and discussed considerations when approving a substantially equivalent organization to perform on-site inspections.
- Ms. Carter noted that the request from the Washington Dental Anesthesia Academy (WDAA) is the first request the Commission has received and that the Commission has established policies for other types of approvals, which list criteria and standardize the approval process.
- Ms. Carter explained that the Commission can approve an organization without a policy in place, encouraged the Commission to consider creating a policy concurrently while reviewing the request from WDAA, and to consider sending the request to committee for further review.

7.2. The Commission will discuss a request for approval as an on-site inspection organization from the Washington Dental Anesthesia Academy.
- Michael Mielniczek, certified registered nurse anesthetist, provided an overview of WDAA and noted that WDAA is trying to meet the demand for on-site inspections in dental offices by becoming a local approved organization.
- Dr. Swanson asked the Commission for feedback on next steps.
- Dr. Karbakhsch asked about the criteria for becoming a site inspector and what types of locations must be evaluated.
- Dr. Yu explained that dentists who hold a moderate sedation with parenteral agents permit or a general anesthesia and deep sedation permit must obtain on-site inspections, and noted that if a provider has multiple sites, they must have the main location inspected and attest that the other locations are equivalent to the main location.
- Dr. Yu suggested declining WDAA's request, since it is not a non-profit organization, and expressed concern over on-site inspections becoming financially motivated.

- Dr. Jurges asked what level of certification is required to be an on-site inspector.
- Ms. Carter explained that approved organizations are listed in rule and volunteer on-site evaluators can be a certified registered nurse anesthetist, physician anesthesiologist, or a dentist who holds the permit that is being inspected or higher.
- Mr. Mielniczek emphasized how difficult it is to find a volunteer to provide on-site inspections and suggested that the Commission consider placing a maximum cost cap on for-profit organizations.
- Dr. Swanson suggested assigning this topic to the Dental Anesthesia Committee to discuss substantially equivalent requirements.
- Dr. Oskouian would like to bring this topic to the full Commission for discussion after the Dental Anesthesia Committee develops criteria for substantial equivalency.

7.3. The Commission may discuss its potential approval process for on-site inspection organizations.
- Dr. Swanson assigned establishing the criteria to become a substantially equivalent on-site inspection organization to the Dental Anesthesia Committee.

8. DENTIST AND DENTAL HYGIENIST COMPACT (DDH COMPACT) – Catharine Roner-Reiter, Supervising Staff Attorney

8.1. Ms. Roner-Reiter may provide an update on the DDH Compact Commission.
- Ms. Roner-Reiter noted that the August meetings were canceled for the DDH Compact's full commission meeting and rules committee.
- Ms. Roner-Reiter shared that Dr. Matthew Bistan agreed that she can serve as the temporary chair of the DDH Compact Rules Committee in a limited capacity.
- Ms. Roner-Reiter explained the compact's original funding sources: the compact was developed through a grant from the Department of Defense, and the funding for the Council of State Governments services came from the American Dental Association.

9. INTERPRETIVE STATEMENTS

9.1. The Commission may vote to approve updates to the *Dentist – Sleep Dentistry* interpretive statement.
- Dr. Swanson asked the Commission for comments on the *Dentist – Sleep Dentistry* interpretive statement.
- No comments were received.
- A motion was made to approve the *Dentist – Sleep Dentistry* interpretive statement.
- The motion was moved and seconded.
- A vote was taken and unanimously passed.

9.2. The Commission will receive an update on the *Dentist Standard of Care – Radiographs* interpretive statement.

- Ms. Gardner shared that the *Dentist Standard of Care – Radiographs* interpretive statement was filed with the Code Revisor as WSR 26-17-090 on August 18, 2026, and a notification was sent to interested parties on August 20, 2026.

10. CORRESPONDENCE

10.1. Correspondence from Daniel Fenn, DDS, FAGD.

- Dr. Swanson discussed correspondence from Dr. Fenn and noted that the Commission is limited by the Washington State Department of Labor and Industries (L&I) minor labor rules, and the Commission's current rulemaking to WAC 246-817-190 will align with L&I's rulemaking, which is broader to allow minors who meet specific requirements to register as dental assistants.
- Dr. Swanson asked Ms. Gardner to send a response to Dr. Fenn stating the above.

10.2. Correspondence from Sylvia Johnston, RDH.

- Dr. Swanson facilitated a discussion with the Commission regarding dentists being able to delegate administering Botox or dermal fillers to dental hygienists.
- Ms. Carter shared that dental hygienists are limited in their scope of practice to certain procedures in statute and any other dental services that can be delegated by a dentist, and noted that the Commission has rules on tasks that a dentist may delegate to a dental hygienist; Botox and dermal fillers are not currently tasks that a dentist may delegate to a dental hygienist.
- Dr. Swanson asked Ms. Gardner to send a response with Ms. Carter's statement, and Ms. Carter suggested including that the Continuing Competency Committee will be discussing scope issues and Ms. Johnston is welcome to attend.
- Dr. Karbakhsch noted that she would like to see uniform standards on Botox and dermal fillers.
- Ms. Carter and Ms. Gardner discussed the draft matrix from the Continuing Competency Committee, which covers scope of practice topics for dentists, including Botox and dermal fillers.
- Ms. Gardner clarified that the committee may resume work on the draft matrix after it reviews guidance from Ms. Carter about dermal fillers.
- Dr. Yoon confirmed that the Continuing Competency Committee will continue to discuss Botox and dermal fillers.
- Dr. Karbakhsch and Dr. Brian Edgar asked for a copy of the draft matrix.

10.3. Correspondence from Shawna Sengara, DDS.

- Dr. Swanson asked Ms. Gardner to respond to Dr. Sengara, stating that her letter and the topic of Botox and dermal fillers were assigned to the Continuing Competency Committee, and she is welcome to attend the committee meetings.

- Dr. Yu noted that Botox and dermal fillers have been an ongoing topic for over 20 years and encouraged the Commission to consider making a definitive decision.
- Dr. Karbakhsch agreed that the Commission should develop guidelines or rules.

11. OTHER

11.1. Kimberly Sanchez, Executive Director, may discuss the active committee list.

- Ms. Sanchez discussed the Commission's active committees, what their key purpose is, and how to move the work forward to prioritize goals and deliverables.
- Ms. Sanchez proposed the idea of creating topic-specific committee structures and welcomed feedback from the Commission.
- Dr. Swanson and the Commission discussed topic-specific committees, merging some committees, and Dr. Swanson asked the Continuing Competency Committee to provide feedback on creating a separate committee to discuss scope of practice topics.
- Dr. Karbakhsch shared that she would like to keep scope of practice topics at the Continuing Competency Committee to maintain oversight.
- Ms. Fulton reiterated her concern about restructuring the Educational Outreach Committee to include only Commission members.
- Ms. Sanchez expressed her appreciation to the Commission for the feedback, and that if it is the will of the Educational Outreach Committee and the Board of Denturists and Dental Hygiene Examining Committee to maintain the current committee structure, she would like to explore how to be more inclusive within the Dental Commission's newsletter and retreats.
- Dr. Strong suggested having the Dental Inclusion Committee create a publication that includes state or local data to eliminate gaps in access and experience of untreated disease, potentially collaborating with the Washington State Health Care Authority.
- Dr. Swanson informed Ms. Sanchez that creating a Scope of Practice Committee is not currently in the will of the Commission and those topics can remain at the Continuing Competency Committee.

11.2. The Commission may vote to approve an FAQ.

- Dr. Swanson asked the Commission for comments on the FAQ about reversal agents.
- No comments were received.
- A motion was made to approve the FAQ as presented.
- The motion was moved and seconded.
- A vote was taken and unanimously passed.

11.3. Ms. Carter may provide the Commission with an administrative update.

- Ms. Carter provided an update to the Commission about how to navigate people or groups contacting commissioners outside Commission meetings about Commission business.

- Ms. Carter advised commissioners to refer any outside contact about Commission business to program staff and that commissioners should not accept gifts, meals, or meeting requests to avoid conflicts of interest or ethical violations.
- Dr. Karbakhsch asked Ms. Carter to create a standard response for commissioners to provide when contacted.
- Ms. Carter will create this communication to share with the Commission.

12. FUTURE BUSINESS

- No future business was discussed.

13. ADJOURN

- The meeting was adjourned at 11:25 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