



PREPROPOSAL STATEMENT OF INQUIRY

**CR-101 (October 2017)
(Implements RCW 34.05.310)**

Do **NOT** use for expedited rule making

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FILED

DATE: August 27, 2020

TIME: 8:50 PM

WSR 20-18-040

Agency: Department of Health- Dental Quality Assurance Commission

Subject of possible rule making: WAC 246-817-120 Examination content. The Dental Quality Assurance Commission (commission) is considering permanent rulemaking to add the Joint Commission on National Dental Examination's (JCNDE) Dental Licensure Objective Structured Clinical Examination (DLOSCE), a non-patient based examination, to allowable practical/clinical examinations in WAC 246-817-120. The commission is also considering amendments to allow an applicant to pass components of the practical examination using one or more testing agencies, rather than only one agency.

Statutes authorizing the agency to adopt rules on this subject: RCW 18.32.002, RCW 18.32.0365, and RCW 18.32.040

Reasons why rules on this subject may be needed and what they might accomplish: In response to the coronavirus disease (COVID-19) pandemic, as all regional, patient-based clinical dentist examinations are cancelled for 2020 in the United States. Graduating dentist students from the University of Washington and Oregon Health and Science University expressed concerns that they will be unable to obtain Washington state dentist licensure unless they take a practical/clinical examination.

The DLOSCE is a practical/clinical examination that is computer-based and does not use live patients. Instead the exam uses 3D models, or manikins, to demonstrate practical skills to fulfill exam requirements for Washington State licensure. The JCNDE has been creating the DLOSCE since 2017 with a planned release in spring of 2021. In response to COVID-19, JCNDE announced an early release of the examination in June 2020. The commission adopted an emergency rule effective on June 15, 2020 (WSR# 20-13-059) to immediately allow for the use of the computer-based examination.

Adding DLOSCE to the list of allowable practical/clinical examinations permanently will reduce licensure barriers for graduates to choose a patient based or a non-patient based examination to obtain Washington State dentist licensure.

On June 5, 2020 the commission approved an updated emergency rule for WAC 246-817-120 allowing graduates to obtain manikin-based clinical examination from more than one testing agency. Regional examination testing agencies have developed manikin-based clinical dentist examinations to replace patient-based. However, one or more of the testing agencies are unable to offer all required sections through manikin-based examination. Removing the requirement for all examination content sections to be passed with a single testing agency will provide additional options for new graduates to obtain clinical examinations for Washington State dentist licensure. Permanent rulemaking to adopt these changes was approved on July 17, 2020

The updated emergency rule accepting DLOSCE and examinations from one or more testing agencies was filed on August 10, 2020 as WSR 20-17-038. The commission intends for the emergency rule to be in place until the permanent rule is adopted.

Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies: None

Process for developing new rule (check all that apply):

- Negotiated rule making
- Pilot rule making
- Agency study
- Other (describe) Collaborative rule making

Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:

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(If necessary)

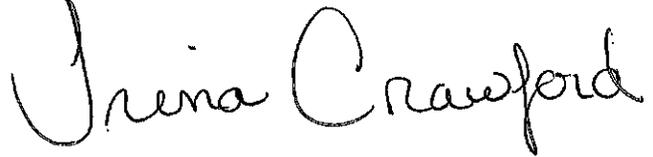
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Address:
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TTY:
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Other:

Additional comments: Stakeholders may sign up for the program's interested parties list (GovDelivery) at <https://public.govdelivery.com/accounts/WADOH/subscriber/new>. All rulemaking notices will be emailed via GovDelivery. Rule development will take place in open public meetings prior to a formal rule proposal and comment period.

Date: August 27, 2020

Signature:

Name: Trina Crawford



Title: Executive Director