



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

**DENTAL QUALITY ASSURANCE COMMISSION**  
**BUSINESS MEETING MINUTES**  
**Friday, June 5, 2020**

**MEMBERS PRESENT**

Julia Richman, DDS, Chair  
Aaron Stevens, DMD, Vice Chair  
Kunal Walia, DDS  
Karla Briggs, Public Member  
Kathleen Elling, EFDA  
Lyle McClellan, DDS  
Abhishake Banda, DMD, MD  
David Carsten, DDS  
Sonia Pal, DDS  
Ronald Marsh, DDS  
Brian Macall, DDS  
Marlynne Fulton, Public Member  
John Liu, DDS  
Bree Kramer, EFDA  
Tiffany Bass, DDS

**STAFF PRESENT**

Martin Pittioni, Office Director  
Trina Crawford, Executive Director  
Jennifer Santiago, Program Manager  
Becky McElhiney, Assistant Program  
Manager  
Bill Kellington, Supervising Staff Attorney  
Heather Carter, Assistant Attorney General  
(AAG)

**MEMBERS ABSENT**

Karen Clements, DDS

**OPEN SESSION**

1. **CALL TO ORDER** – Julia Richman, DDS, Chairperson, called the meeting to order at 8:33 a.m.
  - 1.1. The commission and staff introduced themselves.
  - 1.2. The commission approved the agenda as presented.
  - 1.3. The commission approved the March 6, 2020 Business Meeting Minutes as presented.
  - 1.4. The commission approved the April 2, 2020 Special Business Meeting Minutes as presented.
  - 1.5. The commission approved the April 17, 2020 Special Business Meeting Minutes as presented.

## 2. PUBLIC DISCLOSURE

The commission discussed a request from Seattle Central Community College to be approved professional associations or educational organization to receive list and labels:

- The commission requests additional information.

## 3. RULES

3.1. ESSB 1551 – Repeals AIDS education and training requirements for credentials.

3.1.1. The commission discussed approval of a policy statement placing the repeal into effect June 11, 2020.

- Dr. Marsh moved to adopt a policy statement. Dr. Liu seconded the motion.
- Dr. Carsten shared that HIV/AIDS education is included in most CODA approved programs and expressed his opinion that the rule was unnecessary.
- Ms. Kramer expressed a concern that there are no educational requirements for dental assistants.
- Ms. Santiago confirmed that the dental assistant credential does not require specific training. Ms. Santiago also indicated that the Department of Labor and Industries already has blood borne pathogen requirements in place.
- A vote was taken and the motion passed with one opposed.

3.1.2. The commission discussed repeal of the requirements through the exception CR-102 or expedited CR-105 process for rules that include AIDS education and training requirements.

- Dr. Liu moved to repeal through the CR-102 process. Dr. Carsten seconded the motion. A vote was taken and the motion passed with none opposed.

3.2. WAC 246-817-120 – Examination content

- Ms. Santiago gave an update regarding the Dental Licensure Objective Structured Clinical Examination (DLOSCE). The emergency rule to use the DLOSCE as licensure exam will be filed June 15, 2020. A CR-101 was also filed to adopt the rule change permanently. Rule language to be presented at the next meeting for consideration prior to moving through rule process.

## 4. DENTAL COVID-19 RESPONSE

4.1. The commission discussed dentist clinical examination options from regional examination organizations for approval.

- Ms. Carter shared that the current rule requires written and clinical examinations. Subject content was added to the rule several years ago and includes periodontal. If the commission decided periodontal was optional for this graduating class, an emergency rule would need to be filed to waive the requirement for the periodontal portion.
- The commission discussed the clinical examination option presented by the Western Regional Examining Board (WREB).

- Dr. Carsten expressed his opinion that the Commission on Dental Accreditation (CODA) is robust in its requirements, and that students at all CODA-approved schools should be competent and able to pass. Dr. Carsten expressed concerns about WREB not having periodontal section, as well as the subjectivity of the examinations. Dr. Carsten also does not want the licensure of dental students to be impeded, so he suggested the commission approve the WREB examination provisionally for 120 days.
- Dr. Liu expressed concerns that eliminating the periodontal portion is problematic and cautioned that the commission cannot depend on dental schools to send out people who are competent in every aspect of dentistry. Students at the University of Washington (UW) have access to an objective structured clinical examination, so there is no impediment for them to take objective exam.
- Dr. McClellan expressed his opinion that the state of Washington has been pragmatic about topics covered in examinations, and that it would be a slippery slope to waive requirements due to circumstances. There are a lot of options to take the clinical examination. Dr. McClellan does not think the commission should budge on periodontal and has concerns regarding out of state students.
- Dr. Macall agrees with Dr. McClellan's concerns, and shared his concern that out of state education may not be sufficient.
- Dr. Richman asked Dr. Carsten for an update on the Prometric DLOSCE regarding any limitations in availability.
- Dr. Carsten shared that the American Dental Association (ADA) has requested expanded hours from Prometric, but had no update as of the meeting date.
- Ms. Santiago shared that she has received multiple correspondence from students asking if WREB is going to be accepted. WREB had set a deadline for applications, which was before this meeting. There may be students who have committed to taking WREB without knowing if it has been accepted by the commission or not.
- Dr. Carsten expressed concerns that not approving the WREB examination may penalize some students.
- Dr. Marsh suggested that as a compromise, the commission could require students to take a manikin examination as well as a comprehensive treatment planning (CTP) examination.
- Dr. Carsten shared that he would still have subjectivity concerns, but thinks the option proposed by Dr. Marsh would be more fair to students.
- Ms. Santiago shared that the CTP examination is already a part of their full examination. WREB also offered the CTP examination as a second option as a standalone examination. The current rule requires all examination sections to be from one testing organization. The commission

- could consider filing an emergency rule to remove that requirement so students could take the periodontal portion at another organization. Ms. Santiago cautioned the commission not to base their decisions on what other examining companies are doing now or may do in the future.
- Dr. Liu inquired about the ability of students to be refunded for testing fees if they decide to use another examining organization, and whether the fee includes a clinical portion that they can take at a later time.
  - Dr. Richman expressed concerns that periodontal manikins have been on the market for over 20 years and are available. Dr. Richman finds it unfortunate that this is not included as an option.
  - Dr. Bass shared that the pass rate for WREB periodontal is in the high 90%, and she would support an emergency rule filing to waive the periodontal portion.
  - Dr. Carsten inquired about options for dental students if they have already enrolled and paid fees for an examination with WREB and the commission does not approve WREB's test.
  - Dr. Pal suggested carving out a special exemption of the rule for UW students.
  - Ms. Santiago cautioned against special accommodations for any specific group.
  - Dr. Carsten advised that the commission should treat everyone equally.
  - Dr. McClellan supports Ms. Santiago's previous suggestion about an emergency rule waiving the requirement to take all portions of the examination at one organization so that they can take the periodontal portion at a later date.
  - Drs. Richman and Marsh expressed their support for this option as an emergency rule.
  - Dr. Carsten inquired about whether the commission had required the periodontal portion in prior years because some dentists did not take periodontal examination.
  - Ms. Santiago clarified that it was still a requirement, but had not been explicitly stated in the rule.
  - Dr. Richman inquired about the ease or difficulty to take different tests at different organizations.
  - Ms. Santiago shared that the logistics of scheduling examinations is especially challenging at this time due to the COVID situation, and that she cannot say whether it would be easy or difficult for students.
  - Dr. Carsten shared his opinion that in consideration of CODA and UW, waiving the periodontal examination requirement for 120 days is the only fair thing the commission can do at this moment.

- Dr. Bass expressed her agreement with Dr. Carsten, as well as her opinion that taking a periodontal test at another agency is too difficult right now. The periodontal section is not a difficult section to pass.
- Dr. Marsh moved to file an emergency rule to waive the examination requirement that all portions get taken at one agency. Dr. McClellan seconded the motion.
- Dr. Stevens shared his opinion that the periodontal portion is important, and that waiving the requirement to take a periodontal examination does not protect the public. The commission's primary obligation is to protect the public, not students. Dr. Stevens thinks that waiving the requirement to take all portions at one organization is a reasonable compromise.
- Dr. Richman asked if students were able to sign up for the DLOSCE yet.
- Dr. Carsten shared that the Joint Commission and the ADA have asked Prometric to open up more dates. Currently, the DLOSCE will not be available until June 15.
- Dr. Carsten shared his opinion that making students take a portion of the examination at another organization is too difficult, and that the commission should waive the periodontal requirement for 120 days.
- Dr. Walia asked if this provision is put into place for 120 days, that would mean students who get licensed in the next 120 days will never have to take a periodontal examination. Dr. Walia shared that education has already been cut short by three months, and that students need to take all portions of the examination.
- A vote was taken and the motion passed with 3 opposed to remove the single testing agency requirement.
- Dr. Richman asked if students who take the WREB examination without a periodontal portion would be granted a license.
- Dr. Stevens clarified that the requirement is still in place to pass the periodontal portion and the commission is making an allowance for students who chose WREB to get licensed to take the periodontal portion with another testing agency.
- Dr. Carsten expressed concerns about the additional fees and testing time students who have chosen WREB will incur.
- Dr. Carsten moved to file an emergency rule to waive the periodontal requirement for 120 days.
- Dr. Liu asked Ms. Carter if the commission could put another motion on the table when one just passed.
- Ms. Carter indicated both provisions could be temporarily waived to provide students with two options.
- Dr. Carsten estimated there are currently about 20 WREB students, and shared his opinion that it is a small group but significant in its impact.
- Dr. Bass seconded the motion.

- A vote was taken and the motion did not pass with three in favor and twelve opposed.
- The commission discussed the manikin-based portions of the clinical examination option presented by WREB.
  - Dr. Marsh moved to approve the manikin-based portion of the WREB examination. Dr. Bass seconded the motion. A vote was taken and the motion passed with one opposed.
- The commission discussed the manikin-based clinical examination option presented by the Central Regional Dental Testing Service, Inc. (CRDTS). This examination includes a periodontal section.
  - Dr. Liu moved to approve the examination presented by CRDTS. Dr. McClellan seconded. A vote was taken and the motion passed with no opposed.
- The commission discussed the clinical examination option presented by the Commission on Dental Competency Assessments (CDCA) and the Council of Interstate Testing Agencies (CITA). This examination includes a periodontal section.
  - Dr. Carsten moved to approve all sections of and the American Board of Dental Examiners (ADEX) examination presented by CDCA and CITA. Dr. Marsh seconded the motion. A vote was taken and the motion passed with no opposed.
- The commission discussed the clinical examination option presented by the Southern Regional Testing Agency (SRTA). This examination does not include a periodontal or a CTP or diagnostic skills sections.
  - There were concerns that this test includes a CTP portion within the periodontal patient-based examination but no diagnostic skills portion.
  - Ms. Santiago clarified that the rule requires a CTP or diagnostic skills portion and not both.
  - Dr. Liu moved to continue denial until the commission receives a more formal presentation of changes made since the last denial. Dr. Marsh seconded the motion.
  - Ms. Santiago reminded the commission that based on the previous motion of the 120 day rule, individuals could take the periodontal portion at another organization and this could include a CTP or diagnostic skills portion.
  - Dr. Liu asked for clarification about whether the motion applies only to currently approved organizations.
  - Ms. Santiago indicated that SRTA is approved, but they currently do not meet all the requirements listed in rule.
  - Dr. Stevens moved to accept SRTA's manikin based sections as long as they have fulfilled all other requirements.
  - Ms. Carter clarified that the clinical exam is approved for SRTA.

- Dr. Richman asked if the commission needed to approve or deny the WREB manikin option. Ms. Carter confirmed that they did.
  - Dr. McClellan stated that if the commission filed a 120 day emergency rule, it would give WREB and SRTA applicants another option.
  - Dr. Carsten shared that the reason the commission had not previously approved SRTA is that they do not have a CTP or diagnostic skills portion.
  - Ms. Santiago shared that pre-COVID, SRTA had restorative, periodontal, endodontic, and prosthodontic portions, but was lacking a CTP portion. Post-COVID, there is still no CTP and no periodontal section for the manikin portion, but they have now provided information about a CTP portion. Ms. Santiago would recommend the commission accept the manikin portion, and reevaluate the CTP portion at a later date.
  - Dr. Richman shared that she wants to give students as many options possible.
  - Ms. Santiago reminded the commission that there was a motion on the floor to accept the manikin based portion.
  - Dr. Carsten seconded the motion.
  - A vote was taken and the motion passed with one opposed to approved SRTA manikin portions.
- 4.2. The commission discussed correspondence requesting provisional licensure.
- Ms. Carter shared that there have been requests about granting provisional licenses due to testing limitations created by the COVID-19 situation. Granting a provisional license would require creating a new license type, and the commission does not have the authority to create new licenses. Creating a new license type would require a legislative action.
  - Dr. Richman shared that there are discussions happening at the governor's office regarding provisional licenses or waivers.
  - Ms. Crawford indicated that there are discussions happening about waivers of law and rule language and a temporary license. It is being evaluated to determine how it would work, and what the requirements would be to ensure full licensure requirements would be met in the future.
  - Dr. Richman shared that there is also the potential for special legislative session due to COVID-19, and asked if there were any updates to share.
  - Ms. Crawford indicated that there was interest in a special session, but no specific time frame or decision yet.
- 4.3. The commission discussed the following COVID-19 related topics:
- The Governor's Proclamation 20-24.1:
    - The commission discussed whether to send out information/direction to the dental community regarding reopening.

- Dr. Stevens expressed his opinion that the governor’s proclamation adequately covers the issue and further direction is not needed from the commission.
- Dr. Carsten expressed concerns that the laws are broad, and wondered whether the governor’s proclamation was specific enough that dentists could make informed decisions about how to proceed in their offices.
- Dr. Richman expressed concerns that a message from the commission could restrict dentists, and that a message that is too specific without stakeholder input would be inappropriate. The commission does not want to permit practice beyond what the governor has allowed.
- Dr. Marsh expressed his agreement, and his opinion that with issues changing on a daily basis the commission should wait to send any guidance.
- The commission agreed not to send a message at this time.
- Emails received related to dental offices reopening:
  - The commission received many emails about dental offices reopening and reviewed them. The commission will not discuss the correspondence since the Governor has issued Proclamation 20-24.1 addressing dental offices reopening.
- COVID-19 Testing:
  - This is an issue that the commission anticipates will be coming up. The commission is asking for comments about this from the dental community and the general public.
  - Ms. Carter indicated that COVID testing would have to fall under RCW 18.32.020, section 4, which defines the dental scope of practice as anything taught in an approved dental school curriculum. The commission is requesting stakeholder input whether COVID testing is taught at dental schools so they can review.
  - Dr. Richman clarified that the commission is not ready to take any action but wants to open the topic for discussion.
  - Dr. McClellan inquired how the commission would ensure contact tracing was included, as it is an important part of COVID testing.
  - Dr. Carsten asked whether correspondence received from Washington State Dental Association and the University of Washington about what is taught in dental school and testing would be valid.
  - Ms. Carter clarified that it would be up to the commission to decide validity. There has been disagreement on whether or not COVID testing is within the scope of practice for dentists.
  - Dr. Carsten shared that the Oregon dental board allows testing and vaccinations. Dr. Carsten shared his opinion that it is important part of public health, compared to taking blood pressure.

- Dr. Richman indicated that the market is being flooded with tests and the Food and Drug Administration (FDA) has been issuing emergency authorizations. The ADA has not approved use for dental offices and is still researching. The ADA did issue caution to dentists to avoid “gray market” tests that have not been approved by the FDA, and advised that tests should be conducted per instructions. Dr. Richman expressed her opinion that there would need to be provisions outlined.
- Dr. Richman indicated that this topic will be further discussed at the July 2020 business meeting.

## 5. ELECTIONS

The commission discussed election of the 2020-2021 Chairperson and Vice-Chairperson.

- Dr. Richman provided information about the election process.
- Dr. Richman nominated Dr. Stevens for the position of incoming chair.
  - A vote was taken and Dr. Stevens was elected chair with no opposed.
- Dr. Stevens nominated Dr. Carsten for the position of incoming vice-chair.
  - A vote was taken and Dr. Carsten was elected vice-chair with no opposed.

## 6. ADJOURN

Dr. Richman acknowledged the logistical challenges presented by the COVID-19 situation and thanked Department of Health staff, especially Ms. Santiago, for her efforts in managing the work of the commission.

Dr. Liu asked if the July commission meeting was anticipated to be held in person.

Ms. Santiago indicated that the Department of Health has issued guidance to refrain from holding in-person meetings through December 2020

The commission adjourned at 10:52 a.m.

Submitted By:

Commission Approval By:

Signature on File  
Jennifer Santiago, Program Manager

Signature on File  
Aaron Stevens, DMD, Chairperson