

May 1, 2020

Karen Fischer, MPA, Executive Officer
Dental Board of California
2005 Evergreen Street, Suite 1550
Sacramento, CA 95815

Submitted Electronically

RE: Acceptance of WREB and ADEX Mannequin-Based Examinations

Dear Ms. Fischer:

On behalf of this year's graduating dental students, the California dental school deans, California Dental Association and the CDA student representatives submitted two waiver requests with the intent of creating a pathway to timely licensure within the confines of the COVID-19 pandemic without compromising patient protection. The first waiver request submitted on April 1, 2020, asked to temporarily waive clinical licensure examinations while maintaining all other requirements for initial licensure. This waiver request was denied by the Department of Consumer Affairs, citing that the examination requirement in question and ongoing need to provide oral health care in California cannot be balanced against consumer protection.

In response to the initial DCA denial letter, this coalition submitted a second waiver request on April 17, 2020, to expedite the Office of Professional Examination Services review of the Western Regional Examining Board and American Board of Dental Examiners Inc. mannequin-based examinations. DCA responded with another waiver request denial on April 29, 2020, stating that the Department is not authorized to approve examinations, but rather it is within the authority of WREB and ADEX to determine whether to offer an alternate examination format. While we initially moved forward with submitting a DCA waiver request because this was the format the Department requested stakeholders to utilize during this time, this response is in agreement with our initial evaluation of state law: There is already a statutory framework that

permits the Board to accept the WREB and ADEX mannequin-based examination without any formal action. An analysis of this evaluation is outlined below.

Legislative History of Licensure Examination Approval

In 2004, California legislation was signed into law that provided for the ability of the Board to approve the WREB examination.¹ This first required OPES to review the examination as required by Section 139 for psychometric validity. Upon review of the OPES report, the Board then approved the WREB examination as an acceptable pathway for initial licensure in California. Similar legislation was passed for the ADEX examination in 2016.² Both pieces of legislation and Board approvals were not specific to the format of the examination, but rather the general examinations provided by the approved entities.

Mannequin-Based Exam Format Does Not Trigger OPES Review or Dental Board Action

The review of the psychometric validity of each exam is determined through the parameters set in Cal. Bus. & Prof. Code Sect. 139. This statute mandates OPES to conduct an initial study before an examination is accepted by the Board, regular periodic review and review of any substantial change. Based on past evaluations and evolutions of Board-approved licensure examinations outlined below and the April 29th DCA letter, the mannequin-based examination format is not a substantial change since the same competencies are being tested and therefore does not need additional review for Board approval.

Past Changes in WREB Examination Formats Have Not Triggered OPES Review or Required Dental Board Approval

In 2019, AB 1519 (Low) was signed into law which required, in pertinent part, licensure examinations to test the competency of prosthodontic dentistry. Previously, no specific sections of dentistry were required to be tested, although it was an unenforceable standard that comprehensive diagnosis and treatment planning, restorative, endodontic and periodontic competency were examined. The statute did not specify how competency was to be tested (e.g., via typodont, live patient, comprehensive treatment planning examination ect...), but only that the competency must be examined.³

It was not until Jan. 1, 2020, that applicants standing for the WREB or ADEX examinations would be required to also complete a prosthodontic examination. While the prosthodontic portion of the ADEX examination was included in the OPES study, this section was not required for WREB test-takers until this year. However, due to statutory mandate, the Board is now requiring passing WREB scores to include a prosthodontic section without OPES review of the examination format change. Additionally, the WREB examination has undergone several examination changes since

¹ Cal. Bus. & Prof. Code Sect. 1632.5

² Cal. Bus. & Prof. Code Sect. 1632.55.

³ Cal. Bus. & Prof. Code Sect. 1630.

2004 without board approval; these changes are usually reported during "information only" agenda items at Board meetings.

California law states that the only parameters the Board is bound by are as follows: (1) licensure examinations must be delineated in statute; (2) an initial OPES study must be conducted prior to the acceptance of a licensure examination listed in statute; and (3) the Board-approved examinations must cover specified areas of competency. The mannequin-based WREB and ADEX examinations fit all these criteria because they are listed as acceptable formats in the CDPA, have at least been reviewed by OPES and through comprehensive treatment planning and mannequin-based examination will examine all required areas of competency.

For these reasons, we believe that neither a waiver request nor Board action is required to accept mannequin-based WREB and ADEX examinations for dentist licensure in California. We respectfully request that the Board confirms by May 15, 2020, that these examinations can be used to apply for licensure in California.

Sincerely,



Richard J. Nagy, DDS
President
California Dental Association



Shelby D. Maurice
CDA Dental Student Delegation Chair
DMD 2020 Candidate
Western University of Health Sciences
College of Dental Medicine



Robert Handysides, DDS
Dean
Loma Linda University
School of Dentistry



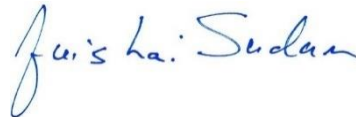
Paul Krebsbach, DDS, PhD
Professor and Dean
UCLA School of Dentistry



Michael S. Reddy, DMD, DMSc
Dean and Professor
UCSF School of Dentistry



Nader A. Nadershahi, DDS, MBA, EdD
Dean
University of the Pacific,
Arthur A. Dugoni School of Dentistry



Avishai Sadan, DMD, MBA
Dean
Herman Ostrow
School of Dentistry of USC



Steven W. Friedrichsen, DDS
Professor and Dean
Western University of Health Sciences
College of Dental Medicine

cc: Dr. Thomas H. Stewart, President, Dental Board of California