

NEVADA STATE BOARD  
of  
DENTAL EXAMINERS



**Continuing Education  
Committee Meeting**

**PUBLIC COMMENT**

AUGUST 25, 2020

6:00 P.M.

**Public Comment:  
TMCC - Lori McDonald, et al.**

## Frank DiMaggio

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**From:** Lori McDonald <lmcdonald@tmcc.edu>  
**Sent:** Sunday, May 3, 2020 9:00 AM  
**To:** Frank DiMaggio  
**Cc:** governor@govmail.state.nv.us  
**Subject:** TMCC Class of 2020 Dental Hygiene Clinical Board Waiver Request  
**Attachments:** Letter to NSBDE and Governor Sisolak.pdf

Good Morning Mr. DiMaggio and Governor Sisolak,

I hope this email finds you well. I am Lori McDonald, Director of Dental Hygiene for Truckee Meadows Community College (TMCC). I am reaching out to you proposing a waiver for the clinical boards for the TMCC Class of 2020 Dental Hygiene Graduates and the possibility of another option that does not utilize live patients for the exam. The letter attached explains in greater detail our request. I am available if you have any questions or need more clarification. The faculty and myself appreciate your consideration of this request.

Regards,  
Lori McDonald

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Lori McDonald, RDH, MA  
Truckee Meadows Community College  
Director, Dental Hygiene  
7000 Dandini Blvd. RDMT 417 H  
Reno, NV 89512  
(775) 674-7554

*"Be the Reason Someone Smiles Today" Unknown Author*

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May 3, 2020

Mr. Frank DiMaggio  
Executive Director  
Nevada State Board of Dental Examiners  
6010 S. Rainbow Blvd., Ste. A-1  
Las Vegas, NV 89118

This is an unprecedented and uncertain time for our country as we respond to the COVID-19 pandemic. As schools have closed and moved didactic instruction to an online format, dental hygiene programs face unique challenges to graduation and licensure. On behalf of Truckee Meadows Community College we are asking the Nevada State Board of Dental Examiners for consideration and guidance for our students.

The Commission on Dental Accreditation (CODA) has recently recognized that each educational program has an obligation and responsibility to ensure that its graduates of the Class of 2020 are competent and has issued temporary flexibility guidelines to ensure that the Class of 2020 are eligible for graduation from a CODA accredited program. Each of the Dental Hygiene Programs will be required to submit to CODA a plan for how we will ensure that our students are clinically competent and meet all graduation requirements in spite of this interruption in their education.

Oregon, Oklahoma, Louisiana, Arizona and Michigan have recently waived clinical boards or offered provisional licenses for 2020 dental and dental hygiene graduates in response to the pandemic. To date, the 2020 class of senior dental hygiene students at Truckee Meadows Community College (TMCC) have completed an excess of the required procedures and hours as required by CODA and evaluated by faculty members. This includes a significant number of patient case types; child, adolescent, adult, geriatric, special needs, advanced clinical cases, and patients with advanced periodontal disease to demonstrate competency. We respectfully ask the Board to consider alternative options and flexibility beyond the live-patient clinical exam administered by the Western Regional Examination Board (WREB) for licensure due to closings, shelter in place and restrictions caused by COVID-19. As you are aware, dental and dental hygiene students are the only healthcare workforce who require graduates to work on a live patient to obtain a license to practice.

The TMCC Dental Hygiene Program faculty members respectfully ask the Board to consider the following alternative options listed in order of preference.

1. Elimination of clinical board exam licensure requirement for 2020 graduates, if given this flexibility by the governor. The American Dental Education Association and the American Dental Hygienists' Association support the elimination of live board patients. This allows CODA accredited dental hygiene programs to determine competency of their graduates, something they are being held accountable to do by CODA for each and every aspect of clinical competency.



2. Allowing substitution of the clinical board exam with the Computer Simulated Clinical Examination (CSCE) OSCE developed by the Commission on Dental Competency Assessments (CDCA). "The exam is designed to assess various levels of diagnosis and treatment planning knowledge, skills, and abilities. Clinically-based questions are utilized through computer-enhanced photographs, radiographs, optical images of study and working models, laboratory data, and other clinical digitized reproductions." States currently administering the ADEX dental hygiene exam include: Utah, Ohio, Illinois, Virginia, and many more. Currently the ADEX OSCE is administered in conjunction with a clinical portion to achieve "ADEX Status", but it can be taken separately. We request the board consider accepting the results of this exam to meet the clinical exam licensure requirement. The ADEX OSCE could be considered the dental hygiene equivalent to the DLOSCE that is being released in June of 2020 by the Joint Commission on National Dental Examinations for dental students. The Western Regional Examination Board (WREB) will also have a computer simulated clinical examination available for dental hygiene testing in June 2020.

Some states are exploring a provisional license, but this option presents the most problems for our graduates if they will still be required to take a live patient clinical board exam as a licensure requirement. If they are expected to take clinical boards within a certain amount of time, they will still need to prepare for the clinical board exam and secure a qualifying patient. Unfortunately, they will have already graduated and no longer be considered students at our institutions by then. This makes it difficult for our institutions to support students in preparing to take their exams. For example, they will need to register for a course to be considered a student, to be covered under the College liability insurance and complete the required annual training to be able to get access to protected health information when screening potential board patients.

We thank the Nevada State Board of Dentistry for their continued efforts to improve oral health care as well as maintain the safety of all Nevadans. We respectfully request your guidance as we move forward. If you have further questions, we can be reached at the contact information listed below.

Regards,

Lori McDonald, RDH MA  
Director of Dental Hygiene  
7000 Dandini Blvd.  
Reno, NV 89512  
(775) 674-7554

Patti Sanford, RDH MA  
2nd Year Clinic Coordinator/Professor

Julie Stage-Rosenberg, RDH MPH  
Professor

Kerry Kuster, RDH, MS (Tenure Track Instructor)

cc Governor Sisolak

Re: FW: Follow up informational document of states suspending clinical licensing exams for oral health programs

Lori McDonald <lmcdonald@tmcc.edu>

Sent: Wed 5/13/2020 7:41 AM

To: Frank DiMaggio

Good Morning Mr. DiMaggio,

The other option is the Western Regional Examination Board (WREB) Computerized Exam, otherwise known as the WREB OSCE. OSCE stands for Objective Structured Clinical Exam, This is something WREB has been working on for quite a while because the past several years there have been conversations, nationally regarding the Clinical Live Patient Exam going toward a computerized exam to be able to show the level of competency and safe practice by the graduates for licensing in each state. Those of us who have been in dental hygiene education for years have seen how things have changed with students finding the "Perfect Patient" who meets the WREB qualifications and also is in good enough health to safely withstand the exam. Also, as mentioned in my letter to obtain a license as a DDS or hygienist, we are the only profession that still requires a live patient clinical exam. All other professions give each educational program the responsibility of being the experts and ensuring the students are competent in their skills before graduation..

The request for the optional computerized exam for the "DH Class of 2020" will show the graduate being competent in multiple areas of dental care. The categories the exam covers are:

- Medical History
- Risk Assessment
- Extraoral and Intraoral Examination
- Periodontal Assessment
- Dental Hygiene Treatment and Care Plan
- Instrumentation

The current clinical WREB exam focuses more on the clinical skill level of the candidate with their live patient being anesthetized and treatment being completed on a portion of their mouth. There is also travel involved for the graduate to get their patient to the WREB testing site and for our students this is either in Las Vegas or other surrounding states.

We are approved by the Commission on Dental Accreditation (CODA) to ensure we are keeping compliant with the ratio of faculty to student observation during clinics and labs and that our curriculum gives the students enough hours in clinic/labs to be competent and safe when treating patients. CODA requires each program the minimum number of clinical hours and our curriculum gives the students an additional 200 hours in clinic and labs during their two years in the program. This is why our graduates have such high passing rates on their WREB Clinical Board exam.

Here is the program link showing our pass rates.  
<https://www.tmcc.edu/dental-hygiene/outcome-data>

As the director of the program I knew we needed to get our students back into the clinical setting on our campus to allow them the opportunity to finish up their clinical and lab requirements and competencies. Even though we are up and over the minimum hours of CODA requirements we wanted to give the students the opportunity to come back and finish their semester. We were approved by our higher administration and are returning for 6 weeks starting May 20th through June 26th.

By getting the students back in the clinic and labs for the extended six weeks we will be able to see what the patients thoughts are and their willingness to come back into the clinic for treatment. There are several reasons for the request to waive the WREB clinical Live patient exam and ask for the other option of the OSCE.

- Safer for the patient and graduate as the WREB requires the patient to have an extensive amount of tartar under the gums for the candidate to scale and a certain number and depth of pockets for the candidate to clean and irrigate. As of right now the equipment required to effectively clean and irrigate below the gumline cannot be utilized due to the aerosols it produces. When each state decides to lift these mandates for utilization of aerosol producing dental equipment then there also is going to need to be High Evacuation Systems in place on the dental unit where the candidate is treating the patient for all to be safe. I am currently looking at this equipment to be implemented into our Clinic this summer. Our "New" Norm.....
- Would give the graduates the option to still take the clinical WREB, if they found a patient that meets the requirements and chose this option or if they are unable to find a patient for the exam then they could take the OSCE. This would reduce their stress when coming back through June to be able to work on their skills needed and not be stressed over trying to find the "Perfect Patient".
- Tests on many more categories which encompass the dental hygiene profession.
- Both Las Vegas and Reno have testing centers where the graduates can take the WREB OSCE exam, if approved.

This request is only for the Class of 2020 Dental Hygiene graduates. I would be happy to talk with you on the phone or virtually if you need more questions answered. I have also attached the WREB OSCE Manual that was just sent to each director for you to look at. Pages 5,6,7 show the categories of the exam.

Thank you for your time and consideration,  
Lori

On Tue, May 12, 2020 at 6:13 PM Frank DiMaggio <[fdimaggio@nsbde.nv.gov](mailto:fdimaggio@nsbde.nv.gov)> wrote:

Ms. McDonald: As a follow-up to your email below, please advise me of what other options you are considering for exams that do not utilize live patients.

Sincerely,

Frank DiMaggio

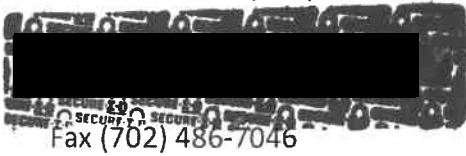
Executive Director

**Nevada State Board of Dental Examiners**

6010 S Rainbow Blvd., Suite A-1

Las Vegas, NV 89118

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**From:** Frank DiMaggio

**Sent:** Tuesday, May 12, 2020 9:26 AM

**To:** 'Lori McDonald'

**Cc:** '[governor@govmail.state.nv.us](mailto:governor@govmail.state.nv.us)'; Candice Stratton

**Subject:** RE: Follow up informational document of states suspending clinical licensing exams for oral health programs

Dear Ms. McDonald:

Thank you for your email. Your request that the Board grant a waiver for the clinical boards for the TMCC Class of 2020 Dental Hygiene Graduates and your inquiry as to the possibility of another option that does not utilize live patients for the exam would need to go before the Board. At this time, the Board lacks a quorum to proceed. After a quorum has been established, your requests can be placed on the Board's agenda.

Sincerely,

Frank DiMaggio

Executive Director

**Nevada State Board of Dental Examiners**

6010 S Rainbow Blvd., Suite A-1

Las Vegas, NV 89118

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**From:** Lori McDonald [mailto:[lmcdonald@tmcc.edu](mailto:lmcdonald@tmcc.edu)]

**Sent:** Monday, May 11, 2020 5:00 PM

**To:** Frank DiMaggio; [governor@govmail.state.nv.us](mailto:governor@govmail.state.nv.us)

**Subject:** Follow up informational document of states suspending clinical licensing exams for oral health programs

Good Afternoon Mr. DiMaggio and Governor Sisolak,

I hope this email finds you well. I am Lori McDonald, Director of Dental Hygiene for Truckee Meadows Community College (TMCC). I emailed you on May 3rd with a letter requesting a waiver for the clinical boards for the TMCC Class of 2020 Dental Hygiene Graduates and the possibility of another option that does not utilize live patients for the exam. I wanted to share with you a document I just received from the American Dental Education Association (ADEA), listing the states that have suspended or authorized a state board agency to suspend aspects of testing or clinical requirements for recent graduates of oral health programs. I also reattached the previous letter I emailed on May 3rd. Please let me know if you have any questions. Looking forward to the next NSBDE meeting.

Regards,

Lori McDonald

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*Lori McDonald, RDH, MA*

*Truckee Meadows Community College*

*Director, Dental Hygiene  
7000 Dandini Blvd. RDMT 417 H  
Reno, NV 89512  
(775) 674-7554*

*"Be the Reason Someone Smiles Today" Unknown Author*

**Public Comment:**  
**Ryan Hunter**

## Frank DiMaggio

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**From:** Rigoberto Morales on behalf of Board of Dental Examiners  
**Sent:** Thursday, May 21, 2020 8:14 AM  
**To:** Frank DiMaggio  
**Cc:** Candice Stratton  
**Subject:** FW: Manikin WREB Licensure Plea

**From:** Ryan Hunter [mailto:████████████████████]  
**Sent:** Wednesday, May 20, 2020 6:32 PM  
**To:** Board of Dental Examiners  
**Subject:** Manikin WREB Licensure Plea

Hello,

I am a recent Dental School graduate from Creighton University and I have just been informed that WREBS will not be able to hold a live patient board exam until September or even later depending on circumstances. I have a family of 4 and we have already signed a lease for a home in Las Vegas. From the information I have received it sounds like Nevada will not accept a manikin board in place of a live patient board exam or even provide a temporary license while we are forced to wait to take the exam. I have heard of a lot of states allowing temporary licenses and a manikin board exam as a path for licensure. I am asking that you reconsider the decision to not allow a manikin board exam or atleast provide a way to obtain a temporary license. Not being able to work as a dentist from March - October would not only be devastating financially but also the skills I have learned would be very rusty. I know there are many students in this same predicament so please try and put yourselves in our shoes and do anything in your power to help us. Thank you

Ryan Hunter

**Public Comment:  
Christine Jacinto**



June 05, 2020

Mr. Frank DiMaggio Executive Director  
Nevada State Board of Dental Examiners  
6010 S. Rainbow Blvd., Ste. A-1 Las  
Vegas, NV 89118

I was a month away from graduating and becoming a licensed hygienist until Covid-19 delayed the process. We are hopeful that this will allow the class of 2020 to graduate on track. By eliminating the clinical portion, we will avoid the conundrum of finding the perfect “board” patient that meets specific board requirements. This patient would also need to be willing to travel out of state to receive an incomplete dental treatment (in which only 1/4 of the mouth will be completed) during the unprecedented time of this pandemic.

My dental hygiene program at Truckee Meadows Community College in Reno, Nevada consists of 14 students. Before the pandemic started 50% of our students were able to find board patients. It took us two months of a two-hour skills lab to find these patients. After the pandemic, 30% of the students still have their board patients. I personally have lost my patient due to his immunocompromising condition. He has expressed to me his concern of traveling and the safety of his well-being. He is no longer interested in the service and from an ethics standpoint I completely understand. I'm sure other patients with systemic conditions will have the same fear and students will encounter the same ethical dilemma. We are going back to school for only 4 weeks and considering it took some of us 8 weeks to locate our board patient, the daunting task of finding a board patient will be very difficult for the class of 2020.

At TMCC the hygiene students of the class of 2020 have had plenty of practice to develop our clinician skills. We've spent over 16 hours a week in our clinic perfecting our skills. Regardless of what happens with the live patient clinical exam, we would still be required to take our national written exam. We currently have plans to extend our semester of clinic to finish our clinical requirements. There are many other health care professions who do not need to take a live clinical board to practice in their field. For instance, nurses take a NCLEX exam, also known as the National Council Licensure Examination. It is a standardized test that every state regulatory board uses to determine if a candidate is ready to become licensed as an entry-level nurse. The dental hygiene board was already in the midst of potentially eliminating the clinical exam in the upcoming years. Covid-19 has taken many of our freedoms away, I believe we were handed a situation in which we are given special circumstances to have the class of 2020 as a trial year if needed. In the end, we will be graduating from an accredited school, as well as have the skills that we have been perfecting for the last two years. I believe there is no need for a clinical examination to determine whether we become a licensed professional in Nevada.

Thanks to everyone who will voice their opinion on our behalf and stay safe.

Regards,

Christine Jacinto 2nd Year Dental Hygiene student

cc Governor Sisolak

**Public Comment:  
Maggie Rodriguez**

**From:** [Maggie Rodriguez](#)  
**To:** [Board of Dental Examiners](#)  
**Subject:** Nevada State Board of Dental Examiners –Board Teleconference Meeting – Tuesday, July 14, 2020  
**Date:** Thursday, July 9, 2020 9:41:30 PM

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Good afternoon all,

My name is Dr. Maggie Rodriguez and I'd like to offer public comment in reference to agenda item #5 addressing "Temporary approval and acceptance of the alternatives to the current Western Regional Examining Board's (WREB) exam for dental licensure, including WREB Dental Licensing Examination COVID-19 Options for 2020, if completed during the period of May 1, 2020 through December 31, 2020 – NRS 631.240."

I want to first express my gratitude and appreciation to the board for allowing me the opportunity to comment on this matter. I'm a 2020 graduate of the University of Utah School of Dentistry and a proud Nevada native. Our original WREB exam was scheduled in April, which was then rescheduled to June and the alternative manikin form of the exam was administered. I am commenting in support of the temporary acceptance of this alternative. While I realize that UNLV was fortunate to have held their licensing exams prior to shutdowns, there are so many of us who were not given the opportunity for live patient exams due to the high risk to patients, students, examiners, and auxiliary staff. Practicing dentistry in my home state is a dream come true, and I hope the board will vote in favor of both WREB and ADEX alternatives.

Thank you for your time,

Maggie Rodriguez, DDS  
University of Utah School of Dentistry Class of 2020

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Maggie Rodriguez, DDS  


**From:** [Maggie Rodriguez](#)  
**To:** [Board of Dental Examiners](#)  
**Subject:** Continuing Education Committee RE: Licensure  
**Date:** Wednesday, July 15, 2020 10:01:54 AM

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Good morning, CE Committee!

My name is Maggie Rodriguez and I'm a recently graduated dentist from the University of Utah School of Dentistry. I was able to listen in on the teleconference meeting last night where it was determined that the CE Committee would be responsible for making the decision on licensure for 2020 graduates. I'm writing to present an endorsement for the acceptance of the alternative forms of WREB and ADEX for this year.

In Utah, the timing of our WREB testing dates forced us to take the manikin-based exam due to Coronavirus-related risks of the live-patient test; we were left in this position as a result of something completely out of our control. In late Spring, WREB conducted several beta tests across the US, one of which was held at the University of Utah that I was able to participate in, to determine if a manikin-based exam would be an appropriate alternative to treating live patients. WREB decided that the alternative was a suitable indicator of a student's ability to perform dental treatment, and thus offered the manikin-based exam for the remainder of 2020.

As was discussed later in the teleconference meeting last night, temporary licenses are going to be granted to 2020 graduates through December, under the condition that a live patient exam is then passed to grant full licensure (this was my understanding). I want to take a moment to explain what I feel are some ethical concerns with taking a live-patient exam, pandemic or not. An extraordinary number of dental students (and soon, temporarily licensed dentists) are routinely pressured to essentially "buy a person" for their body; since failure of the exam is possible due to a technicality such as a patient not showing up, it has become something of the norm for candidates to pay out of their own pockets the cost of the patients treatment, travel expenses for the patient, and other incentives like gift cards and cash, just to assure that the patient will show up. Manikin-based exams completely eliminate this unprincipled practice.

Additionally, many recent graduates, myself included, are no longer living in the city (or even state) where they attended dental school, and therefore access to a testing site would likely require the candidates (and patients) to travel. Not surprisingly, in light of COVID-19, some additional ethical concerns revolve more around how reasonable or unreasonable it is to force candidates to travel with patients across the country and foot the bill for it, including safety issues that may come with traveling with a stranger, and for the potential legal issues if that patient contracts the coronavirus due to traveling with a candidate for boards.

While I can think of countless other reasons why live patient licensure exams are disreputable, I will end here: live patient exams make it impossible for an even playing field; no two fillings are alike, no two patients are alike in terms of their health and medical problems, medications, etc. all of which can play a role in potential failure of the exam. You can fail if your patient's blood pressure is too high! This is completely out of the candidate's control. Again, WREB has determined that the manikin-based exam is a fair and excellent measure of skills and competence, and I believe that students who complete all competency assessments, graduate from a CODA-accredited school, and pass the alternative forms of WREB or ADEX should be eligible for licensure.

Please understand that this is coming from a place of passion and frustration. It is exciting to see other states adopt licensure reform, whether it be temporary for the Class of 2020 or paving the way for future classes of new dentists. We are living in unprecedented times and I realize that the NSBDE has been faced with many recent challenges, and licensure is just a small drop in a huge bucket. Your work and dedication to the oral health and wellbeing of Nevada communities is sincerely appreciated. I truly hope that my words will be met with compassion and that we can come together to reach a decision that will safely benefit all involved.

Thank you for considering the information that I've presented.

Maggie Rodriguez, DDS



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Maggie Rodriguez, DDS



**From:** [Board of Dental Examiners](#)  
**To:** [Angelica L. Bejar](#)  
**Cc:** [Phil W. Su](#)  
**Subject:** FW: PUBLIC COMMENT NSBDE Teleconference Meeting 8/4/20  
**Date:** Monday, August 3, 2020 1:46:52 PM

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**From:** Maggie Rodriguez [mailto:████████████████████]  
**Sent:** Monday, August 3, 2020 1:35 PM  
**To:** Board of Dental Examiners  
**Subject:** PUBLIC COMMENT NSBDE Teleconference Meeting 8/4/20

Hello everyone,

Thank you for allowing me the opportunity for public comment. I'd like to make a quick statement relating to agenda item #5 "Consideration of Applicant's petition for review of Application for Dental Licensure – NRS 631.240 & NAC 631.050". I graduated in May 2020 from the University of Utah School of Dentistry where our original WREB exam had been rescheduled due to shutdowns related to COVID-19, and was rescheduled for manikin-based only in June. This year, after determining that live patient-based exams posed too great a risk for students, patients, auxiliary staff, and examiners, WREB had conducted several beta manikin exams and determined that this alternative was an appropriate and suitable indicator of a student's ability to perform dental treatment on live patients. Due to the extenuating circumstances that prevented myself and many other 2020 graduates from taking live-patient exams, I want to offer a stance in favor of allowing any 2020 graduates who have successfully passed the manikin based WREB exam to qualify to apply for full licensure.

Thank you for your time,

Maggie Rodriguez, DDS

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Maggie Rodriguez, DDS  
████████████████████

**Public Comment:  
Sarah Herrmann, DDS**



## Frank DiMaggio

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**From:** [REDACTED]  
**Sent:** Tuesday, July 14, 2020 9:34 AM  
**To:** Board of Dental Examiners  
**Cc:** Frank DiMaggio; 'Jim Seyfried'  
**Subject:** CDCA (ADEX) Nonpatient Restorative Exam

Hello Nevada Board of Dentistry,

As of 7/14/2020, 34 states have accepted the non-patient restorative exam, according to the **ADEX Acceptance Maps** --From <https://www.cdcaexams.org/adex-acceptance-map/>

...This does not include states like Oregon that accept any clinical exams, or states without a current active board of dentistry. Most of these state are also waiving the perio/scaling this year due to the pandemic.

I was planning to move to Nevada and start working with Dr Seyfried, in Minden, Nevada, upon graduation from University of Minnesota School of Dentistry. When Covid-19 cancelled the live patient examination, shut down our school clinics, and stopped patient screenings, my options were very limited. Out of 126 students, approximately 20 signed up to take the live patient exam, after shuffling around patients that were screened by all the other students prior to clinic shut down. Out of that 20, I know some said patients did not show up due to fear from covid-19 and all the riots that were occurring in Minneapolis/St Paul the week we were scheduled to take the licensing exams.

I was trying to get this email out to the board for the meeting tonight and realized this morning it was sitting in my outbox...

Thank You,  
Sarah Herrmann, DDS

**Public Comment:  
CSN - Missy Abel, et al.**

**To the Nevada State Board of Dental Examiners and the Governor of Nevada, Steve Sisolak**

**RE: CSN Dental Hygiene Program Opinion with Waiving Clinical Boards for the DH Class of 2020**

The Class of 2020 Dental Hygiene students face an interruption of education due to an unprecedented pandemic across the country. The educational institutions in Nevada handled the interruption of education immediately. Resources and communication were provided to students and faculty to handle the necessary changes to continue student education. The problems encountered for completion of some courses for health programs and those specific to dental hygiene are clinical skill acquisition and patient care delivery that can only occur in a clinical setting.

The Commission on Dental Accreditation (CODA) set forth some “flexibility” to program requirements but that each institution has an obligation and responsibility to ensure that its students are competent upon graduation.

It is the opinion of the College of Southern Nevada Dental Hygiene Program that a rush to a resolution to eliminate clinical boards for licensure for the Class of 2020 would not be in the best interest in the practice of dentistry in Nevada and to those practitioners the state has previously licensed.

CSN and TMCC offer a competency-based education. Having an outside agency evaluate clinical skills and delivery of patient care that is impartial, though not perfect, validates the education received by the students across the United States with the exception of Alabama. Clinical boards provide validation for licensees seeking licensure in Nevada or other states.

Alternative methods have come forward for the Class of 2020. There is a stance to waive the clinical board completely, substitute the clinical board exam with a Computer Simulated Clinical Examination (CSCE), the ADEX OSCE, and the WREB will release its computer simulated clinical exam in June. The exams are designed to assess various levels of assessment, diagnosis, treatment planning, clinical skills and abilities. It is the last two that are in question to evaluate effectively individual clinical skills and abilities in the interest of the public.

Affording a “one-time special license” in response to the COVID 19 worldwide pandemic would not change the current statute. The Board could issue this “Special License” under which graduates be licensed and then within a short timeframe to complete a clinical board.

Nevada, Battle Born, should remain true to the laws that govern the people for their safety in the state. We hope that the board will consider the student’s position and work with them to attain this “one-time special license” without compromising public safety.

The College of Southern Nevada Dental Hygiene Program appreciates the efforts that the Nevada State Board of Dentistry is making during this time of crisis. As health care practitioners, our patients are our ultimate concern. We hope that you strongly weigh the public safety of Nevadans and the statutes rather than rush to judgement regarding licensure.

Respectfully submitted,

Missy Abel RDH, M.Ed  
CSN Dental Hygiene Programs Director  
[Missy.abel@csn.edu](mailto:Missy.abel@csn.edu)

Cara Lutes-Kirby RDH, MPH  
Community Outreach Coordinator  
[cara.lutes-kirby@csn.edu](mailto:cara.lutes-kirby@csn.edu)

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Supervising Dentist  
[Gary.widdison@csn.edu](mailto:Gary.widdison@csn.edu)

**Public Comment:  
Pooja Mehta, DDS**

## Frank DiMaggio

---

**From:** Pooja Mehta <[REDACTED]>  
**Sent:** Thursday, July 16, 2020 12:27 PM  
**To:** sbde@nsbde.nv.gov; Candice Stratton  
**Cc:** Frank DiMaggio  
**Subject:** IMP: Regarding licensing

To the Nevada State Board of Dental Examiners

Dear sir/mam,

I am writing in regards to the decision taken during the board meeting on July 14, 2020 at 6:00 pm. We were all so hopeful and ready to celebrate. However, it was disheartening to know that the long awaited decisions were still not made. As a group of students, we also sent a petition to the board, which was not included with other attachments in the meeting. I cannot comprehend the uncertainties attached to my life and career because of the delay in receiving an answer. I am not able to express how much stress I experience because of the fact that I do not have money to pay loans, no job and do not know if I can be with my family in Nevada.

**Temporary licensure for dental graduates of class of 2020 was approved. How do we apply for it and what documents will be required?**

I would like to again emphasize that the WREBS and ADEX alternative testing methods are completely standardized and have the ability to test our competency appropriately. Also, I am a graduate of a CODA accredited institution, UCSF School of Dentistry. The requirements and clinical experience at my school were so robust that it would be inappropriate to believe that these students are not competent based on the inability to give a patient-based WREBS or ADEX examination. Also, we still need to give a clinical exam when the Emergency is lifted by the Governor. What kind of clinical exam? and where? Will there be any testing centers open to conduct an exam at that time? We do not know any of these.

**So I, literally, request you to please trust the education we received and accept the alternative testing methods (equally standardized) to help us get a permanent license. I assure you, it is the right thing to do.**

I understand the board needs to follow a protocol. But these are desperate times and your students need similar actions. None of us asked for this but now that we are in it, it is our responsibility to help and support each other. I am hopeful that the CE committee will take a decision as soon as possible. I would also like to contact the CE committee to discuss the same. Please provide appropriate contact information.

Thank you,  
Regards,  
Pooja Mehta, DDS, MPH

**Public Comment:  
2020 Dental Graduates**

**June 10, 2020**

The Office of the Governor and the Nevada State Board of Dental Examiners,

Re: Request to accept the Alternative testing methods implemented by WREBS Licensure Examination (Mannikin-based operative and CTP for perio section) for the graduating class of 2020 in the State of Nevada

First, we appreciate the time you have already invested in helping the class of 2020 graduates. Thank you for your consistent help and support of the dentists of Nevada. That shows solidarity and care on your part.

In the wake of this pandemic, no one is left unaffected by the wide sweeping changes society has sacrificed to attempt to “flatten the curve” including graduating dental students who, due to in-person clinical examinations being canceled indefinitely, are left with no immediate pathway to licensure. These graduates are armed with the knowledge and expertise to provide vital medical services. The students about to graduate have invested deeply in their education, have completed all educational requirements and are ready to enter their profession and serve the unmet oral health care needs of our communities. Unfortunately, they do so at an unprecedented time in our state and country’s history; a time that will keep them idle and unable to contribute without action.

Our mutual goal is for 2020 dental graduates to show competency through a hand skills exam so that we can practice as fully licensed dentists as soon as is prudent and possible. We are writing to you to help explain some barriers still in our way as the class of 2020 that create a very burdensome and unethical situation for us in hopes that you will consider your decision to **accept manikin-based exams for this graduating class of 2020**. Please put yourselves in our shoes. We know that you were similar to us not too long ago.

Our confidence in this request is founded in our personal experience of the rigorous dental programs accredited by CODA and a firm commitment to high standards of care. It is imperative that students graduate in a timely manner in order to enter the workforce, matriculate into advanced education residency programs and begin to serve their communities. The Nevada Dental Association has also expressed its confidence in our cause and supports us the request (Support Letter attached)

As we all know, WREBs have come up with alternative options for examining the candidates such as Mannikin-based exams ([Check here](#)). Many dental schools are adopting alternative methods of testing as suggested by the Western Regional Examining Board (WREB). About 17 states have declared their acceptance for the alternative methods. That includes Arkansas, Colorado, Idaho, Illinois, Kansas, Massachusetts, Missouri, Minnesota, Nebraska, New Mexico, Oklahoma, Oregon, Tennessee, Texas, Utah, Virginia. Till date, there has been no update regarding licensing from any governing bodies in Nevada. We have contacted the Dental board multiple times but received no accurate answer. It was shocking to know that this issue was not even on their agenda in the coming weeks and no one is talking about it.

With the current pandemic, the traditional live patient exam in this environment is extremely burdensome and unsafe for current graduates. At this point most of the licensing exams on live patients are cancelled until further notice. The ambiguity of our circumstances creates many problems for us.

First, the uncertainties related to our licensing leaves the new incoming dentists with lack of opportunities in their place/city of choice. We have families to support in Nevada, we want to live and work here, however without the license it is impossible to be able to do that. We are at least 70-80 new graduates ready to serve the state of Nevada. The employers are unable to provide any offers without the certainty of the licenses. And that makes sense. So, until there is an answer, we would be left without job security in Nevada. Let's say, we move to another state for the time being, but this takes away from our loved ones affecting our quality of life and happiness. Also, it is extremely difficult for a family to move in these circumstances and start a new life. We know, hiring is slow all over the country. We cannot even imagine the difficulties of graduates with kids.

Secondly, if a traditional WREB examination were to happen, we do not know when that would be. With the schools remaining closed until graduation, it is very difficult for us to find patients, screen them, and give a diagnosis. Even if schools allow us to come back for screening patients, how safe is it? Bringing the students back to complete graduation requirements, the schools have had to implement many new protocols and Covid-19 screening/testing. It is unrealistic to help students for WREB screening on such a large scale. Also, the curve has not completely flattened, so we are looking at this happening October or later. This would mean, the class of 2020 will be unemployed until then and without a means to pay back our student loans.



Additionally, the WREB is going to ask the students to select one of the two options - 1. Take the traditional patient-based examination whenever it may happen. 2. Take the alternative Mannikin-based exam. Choosing either of them means, if we want to take the second option later, we will have to pay the fees in full again. As new graduates, we are deep in debt. According to ADEA in 2019 the average graduating dental student debt<sub>1</sub> was \$292,000. Money is not something we can afford to throw around. We acknowledge that dental licensing is an investment to help us pay off the rest of our debt but adding expenses when those expenses could be avoided is poor business in all senses.

Liquidity is not something that dental students have. We are unable to take out extra money for future unforeseen expenses such as these. We have other normal expenses that we still have like supporting our families, buying a professional wardrobe, paying for licensing exams themselves, licensing, malpractice insurance, national DEA license, and the list goes on. The student loan repayment grace period is also for 6 months only. With no job for the first 4-5 months put a lot of pressure on us. Every case cannot be explained here but we have more problems and responsibility outside of this specific challenge.

Some of the students hoping to come back to Nevada also have residencies that they are starting soon. These residencies, in our experience, have been reluctant to allow students to leave for pretty much any reason. This adds difficulty in trying to leave for a licensing exam and makes it more important that we take the manikin-based exams that our home schools are offering in June and July. One might think residencies would understand the situation but many of the programs have yet to be flexible in many situations with students wanting to practice in Nevada and those outside of Nevada as well.

Many, if not all, of the students have registered and paid for exams from certain testing agencies already. It is not easy to get refunds from these testing agencies in order to switch to a different testing agency that offers a live patient exam, a physically closer exam or an exam that occurs earlier in time so that a proper license can be obtained sooner. It is also difficult to switch exam locations which could be necessary if the exam site that you are scheduled at is going to do only a manikin-based exam and you need a live patient exam. Most of the testing agencies require weeks' notice about moving exam locations or receiving a refund yet they are making decisions regarding whether an exam will be live patient, manikin, or cancelled past the date that action by the students is possible. That

essentially leaves us at the whim of schools and testing agencies and not in control of our own situation.

WREB has also decided in both Washington and Utah to not offer live patient exams at all and many schools in California are implementing only Mannikin-based exams. That could be the case in other states as well. Those are schools where several people come from to practice in Nevada.

### **Projected Expenses if a live patient-based exam is to happen in future**

Dentist Expense -

- Dentist flight - \$350
- Dentist hotel for 4 days - \$400
- Dentist Food for 4 days - \$150
- Dentist Rental Car for 4 days - \$250
- Malpractice Insurance for those few days in another state - Unknown! (normally this is paid for by schools we are attending but cannot be in the future because we will no longer be students)

Patient #1 expenses - \$1250

- Flight - \$350
- Hotel 2 nights - \$200
- Taxis - \$50
- Lost time compensation - \$500
- Food - 50\$/day = \$150

Patient #2 expenses - \$1,250

- Flight - \$350
- Hotel 2 nights - \$200
- Taxis - \$50
- Lost time compensation - \$500
- Food - 50\$/day = \$150

2 Backup patients - \$2500

Exam Fees - \$3,000

**Conservative Total Cost per student \$9,450**

These numbers will possibly increase due to flights being more expensive, flying to and from different places, and the economy shifting after this pandemic. Not to mention the basic expenses of rent, car payments, loan repayments and so on that we have to take care without a job!! At least \$6,500 of these expenses are expenses that we could not have planned for and that will evaporate if the board chooses to accept Manikin based exams.

Many schools across the country are opting to ask testing agencies across the country to administer manikin based exams because the states in which they reside allow students to be licensed that way. A list has been provided below. This creates problems for students whose state they want to practice in still require live patient exams. The more states that decide that manikin based exams are a prudent solution for this year, the more difficult it will be for us to be licensed using a live patient because fewer and fewer schools will offer live patient exams. In that same vein, testing agencies have not been open to administering two types of exams at the same site at this time.

#### **As of May 18, 2020**

1. Arizona – Manikin based exam accepted if it is administered by WREB or CDCA
2. California - Manikin based exam accepted if it is administered by WREB
3. Florida - This year only, Manikin Exams accepted
4. Idaho - accept a manikin exam in lieu of a patient-based operative exam and WREB CTP exam will be accepted in lieu of the patient-based periodontal examination.
5. Illinois - Manikin Exam
6. Iowa - Manikin exam plus the CDCA OSCE exam or the WREB CTP exam grants licensure
7. Kansas – Manikin exam for operative with the WREB CTP counting for perio.
8. Kentucky - Manikin exam with temporary license until such exam
9. Maine - Manikin based exam
10. Minnesota - Manikin based exam with no need for perio
11. Mississippi - Manikin Based exam with no need for perio
12. Missouri - temporary exam until manikin exam can be taken and passed
- Nebraska - Manikin based exam
13. New Mexico - accept a manikin exam in lieu of a patient-based operative exam and WREB CTP exam will be accepted in lieu of the patient-based periodontal examination

- 14.Oklahoma - accepting manikin based exams
- 15.Oregon - Manikin based exam
- 16.Pennsylvania – Manikin Based Exam with no need for perio
- 17.Tennessee - Manikin based exams
- 18.Texas - Manikin exam with no need for perio
- 19.Utah - Restorative manikin with CTP or CDCA OSCE counting as perio section; temporary license until we can take that exam
- 20.Virginia - Manikin exam

This list is coming from an official Facebook group created by the WREB. It is the most up to date list out there because Dental Boards don't post press releases when they make decisions. The information is really only known by those in attendance at the meetings. The ADA also provides a map that provides information about each state and what they allow for licensure but this is not as up to date and clear. For example, some states like Arizona have said that they are accepting anything that ADEX or WREB is proctoring but the ADA map just still says that they are accepting ADEX and WREB.

We believe we can be licensed via alternative methods to the live patient exam and still be shown to be competent and contributing members of the dental community here in Nevada. While manikin-based exams do not test some of the more abstract and qualitative parts of dentist-patient interaction, these manikin-based exams are sufficient for the current situation given that these tests are to test competency and not excellence. The board trusts manikin-based exams for portions of the test already — Endodontics and Prosthodontics. These procedures are arguably more difficult than either perio or direct restorations on live patients, yet they are sufficient. It is our understanding that the profession has moved to manikin-based exams for those portions in part because of the difficulty of acquiring patients for those procedures and for the time-consuming nature of those procedures. At this time, all live patient procedures are difficult to acquire patients for and the procedures have to be postponed for an unknown amount of time and are thus license limiting.

These testing agencies have shown that their tests are valid methods of testing through their beta tests. They briefly covered that in their presentations to the Nevada board a few weeks ago. There are many other states who feel the same way this year. We respect that you want to protect the public. But, if we have

trusted licensing exam agencies with the ability to test competency in the past, we believe they can be trusted to do so now.

We believe the Utah State board is the example that should be followed. They are allowing their students the flexibility of a temporary license with the option to take the manikin-based exam which is being given at the University of Utah on June 25th-28th. They are allowing the written portion of the WREB examination to count as the Periodontal section. This allows new graduates to get jobs as soon as they can work through all the other necessary steps, contracts, insurance credentialing, malpractice insurance acquisition, etc. This also allows new graduates to become legitimately licensed on a quicker timeline due to the ability to take exams at the schools we have attended. Full licenses allow us to help provide for dental care to the people of Nevada for when stay-at-home orders are lifted.

We believe this letter to represent the concerns of all new graduates hoping to be licensed in Nevada. We have shown the monetary and employability burden that a live patient exam places on us as new graduates and the stress we may experience. We have invested all these years with great dedication and hardwork and we share the common goal of betterment for the communities of Nevada.

We realize that this is an evolving situation and it appears that we will be observing some form of social distancing for the foreseeable future. We hope that we helped you stand in our shoes today. Removing barriers to licensure for students graduating this year is the right thing to do. We are your colleagues. We are future members of this board. We are the future of dentistry. We need your help. Please reconsider accepting manikin-based exams for this year. Please consider meeting within the next couple of weeks because many of us have to make decisions about whether we will withdraw from exams we are currently scheduled to take.

**Thanking you,  
Regards,**

**2020 Dental Graduates**

Pooja Mehta



University of California San Francisco, School of Dentistry  
[REDACTED]

Hanna Lee



Nova Southeastern College of Dental Medicine, Florida  
[REDACTED]

Maggie Rodriguez



University of Utah School of Dentistry, Utah  
[REDACTED]

Natalie Evans



University of Washington School of Dentistry  
[REDACTED]

Kent Horsley



Loma Linda University School of Dentistry



Emilio Tapia

University of the Pacific Arthur A. Dugoni School of Dentistry



H. Wayne Chesser Jr



University of Colorado School of Dental Medicine



Amanda Kobayashi



Creighton University School of Dentistry, Class of 2020



Eric Hui



University of Nevada, Las Vegas School of Dental Medicine

[REDACTED]

Kieran Caberto



Creighton University School of Dentistry

[REDACTED]

Anthony Brian Decker



LECOM School of Dental Medicine

[REDACTED]

Brett Parks

University of California, San Francisco

[REDACTED]



Jared Walker



Midwestern University College of Dental Medicine - Arizona



Christine Ho



University of the Pacific Arthur A. Dugoni School of Dentistry - Class of 2016

Licensed in California, applying for initial licensure in Nevada



Hahnnah Park



University of the Pacific Arthur A. Dugoni School of Dentistry - Class of 2020



Natalie Schneider

A handwritten signature in cursive script, appearing to read 'Natalie Schneider', with a long horizontal line extending to the right.

University of Nevada, Las Vegas School of Dental Medicine


[Redacted]

Tri T. Tran

TRI TRAN

University of Nevada, Las Vegas School of Dental Medicine

Audrey Riegel

A handwritten signature in cursive script, appearing to read 'Audrey Riegel', with a long horizontal line extending to the right.

University of Nevada, Las Vegas School of Dental Medicine

[Redacted]

Cristian Sosa



University of Nevada, Las Vegas School of Dental Medicine



Michael Hartmann



University of Nevada, Las Vegas School of Dental Medicine



*Calvin Tyler Skinner*

Class President of University of Utah School of Dentistry Class of 2020



*preetiza*

Preetiza Dixit Gyawali

University of Colorado School of Dental Medicine



Sarah Herrmann

University of Minnesota School of Dentistry

[REDACTED]

Caitlin Kemper

UNLV School of Dental Medicine

[REDACTED]

Carolyn Hsu

Creighton University School of Dentistry, Class of 2020

[REDACTED]

Austin Colovich

Creighton University School of Dentistry, Class of 2020

[REDACTED]

*Jessica Nguyen*

University of Minnesota -School of Dentistry, Class of 2020

[REDACTED]

Gabriela Flores



Tufts University School of Dental Medicine, Class of 2020

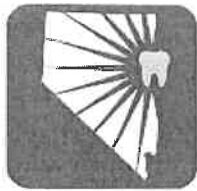
[REDACTED]

Parra Phuong



University of the Pacific Arthur A. Dugoni School of Dentistry, Class of 2020

[REDACTED]



# Nevada Dental ASSOCIATION

June 22, 2020

The Nevada Dental Association signs this letter of support for the graduating dental students letter dated June 10, 2020 requesting Governor Sisolak and the Nevada State Board of Dental Examiners for the acceptance of alternative testing methods in the interim due to unforeseen circumstances that have arisen due to the COVID-19 crisis.

  
*Mark D. Funke, DDS*

President, Nevada Dental Association

## References

1. ADEA *Educational Debt* ADEA.org  
[https://www.adea.org/GoDental/Money\\_Matters/Educational\\_Debt.aspx](https://www.adea.org/GoDental/Money_Matters/Educational_Debt.aspx)
2. ADA *Dental Licensure by State Map*  
<https://www.ada.org/en/education-careers/licensure/dental-licensure-by-state-map>

**Public Comment:  
Ben Abrahams**



8/18/2020

Members of the Nevada State Dental Board,

Thank you for providing me the opportunity for public comment. I'd like to add to Dr. Maggie Rodriguez's public comment from the 8/4/20 board meeting. This is in regards to NAC 631.090 and NRS 631.240. In February 2020, I successfully completed the periodontal and anterior restorative exams for the American Board of Dental Examiners (ADEX) on a live patient. At that time, I was scheduled to challenge the posterior restorative exam on a live patient in April 2020. However, due to COVID-19, the live patient exams were replaced with the manikin based ADEX CompeDont exam. I successfully completed the posterior restorative exam on the manikin based CompeDont exam in April 2020. ADEX has informed me that the Nevada State Dental Board has not publicly announced acceptance of the ADEX CompeDont manikin exam for posterior restoration. However, after reviewing the provisions and statutes set forth by the board, I am unable to find mention of the requirement for the clinical examination to be performed on live patients. I have highlighted sections that have led me to this interpretation.

**NAC section 631.090:**

“an applicant taking the **clinical examination approved by the Board and the American Board of Dental Examiners** or the clinical examination administered by the Western Regional Examining Board must:

1. Pass the Dental Simulated Clinical Examination **or a comparable examination** administered by the Western Regional Examining Board, as applicable;
2. Demonstrate proficiency in endodontics as the organization administering the clinical examination requires;
3. Demonstrate proficiency in fixed prosthodontics as the organization administering the clinical examination requires;
4. Demonstrate proficiency in restorative dentistry **as the organization administering the clinical examination requires**;
5. Demonstrate proficiency in periodontics as the organization administering the clinical examination requires; and
6. **Perform such other procedures as the Board requires.**”

Furthermore, on April 6, 2020, the American Board of Dental Examiners (ADEX) announced their approval of the manikin (CompeDont) clinical examination, in place of the previous requirement of a live patient.

2020 ADEX™ Press Release

For Release: April 6, 2020

Email Inquiries: [office@adexexams.org](mailto:office@adexexams.org)

**LAS VEGAS, NEVADA** — The American Board of Dental Examiners, ADEX™, has approved the use and offering of the CompeDont™, the simulated tooth developed as an alternative option

8/18/2020

in the dental licensure examination restorative challenge. The CompeDont™, produced with support from The Commission on Dental Competency Assessments, will be used in the anterior and posterior preparation and restoration sections of the ADEX dental clinical licensure examination.

**NRS section 631.240**

1. Any person desiring to obtain a license to practice dentistry in this State, after having complied with the regulations of the Board to determine eligibility:

(a) Except as otherwise provided in [NRS 622.090](#), must present to the Board a certificate granted by the Joint Commission on National Dental Examinations which contains a notation that the applicant has passed the National Board Dental Examination with an average score of at least 75; and

(b) Except as otherwise provided in this chapter, must:

(1) Successfully pass a clinical examination approved by the Board and the American Board of Dental Examiners.

Based on these provisions and the ADEX press release, my interpretation is that applicants who have successfully completed clinical examinations, which are approved by the governing body of such examinations, should not be withheld licensure in the state of Nevada.

Due to the extenuating circumstances that have prevented many 2020 graduates from taking live-patient exams, I implore the Nevada State Dental Board and Continuing Education Committee to publicly announce the acceptance of manikin based clinical examinations for dental licensure in the state of Nevada. Without the reassurance that we will be able to attain proper licensure, it is difficult for those of us wishing to relocate and practice dentistry in the great state of Nevada to do so.

Thank you for your time and consideration.

Sincerely,

Ben Abrahams

References:

<https://adexexams.org/adex-approves-use-of-compedont-in-licensure-exam-2/>

<https://www.leg.state.nv.us/NRS/NRS-631.html#NRS631Sec240>

<https://www.leg.state.nv.us/NAC/NAC-631.html#NAC631Sec090>

**Public Comment:  
- Stephanie Minor**

August 24, 2020

To: The Nevada State Board of Dental Examiners

I would like to advocate for permanent acceptance of all alternative dental hygiene licensure exams by the Nevada State Dental Board. This includes the OSCE from WREB and the ADEX manikin in place of live human subjects. I would also like to respectfully ask the Board to consider acceptance of the CSCE OSCE from CDCA. This exam truly offers the most options to dental hygiene students and ultimately Nevada in the following ways:

1. Easy Scheduling: The CSCE OSCE from CDCA is not held at an educational institution. It is proctored by Prometric, a third-party testing center. Prometric shows an estimated 100 available testing days in both Las Vegas (CSN) and Reno (TMCC), so students can challenge the exam at their discretion. Note: WREB has two remaining OSCE dates for 2020, both are in Utah.
2. Priority for Essential Personnel: Dental hygiene testing candidates are considered ESSENTIAL at Prometric and are given priority test date selection.
3. Hometown advantage: The CSCE OSCE from CDCA is offered in our hometowns, both Reno and Las Vegas. We do not have to leave town or risk interstate travel with or without patients.
4. Exam Site Closure: If schools close due to the pandemic, licensure exams are cancelled. Prometric will continue testing with appropriate Covid-19 safety protocols already in place.
5. Exam Cancellation: Recent exams have been cancelled due to an examiner testing positive for Covid-19, Prometric exams are computerized in a socially distanced test center with minimal interaction between proctors and candidates, minimizing the possibility of transmission.
6. CSN closure: If CSN closes due to Covid-19, the class of 2020 will not be able to screen for live human subjects. Heading into fall flu season with a pandemic raging, this is an unacceptable gamble for a high stakes exam with a \$1,000 price tag. Allowing the OSCE avoids this.
7. Reciprocity/Portability-The CSCE OSCE from ADEX is already accepted for full licensure in states like Nevada that do not require a psychomotor component. These are Kansas, Oregon, Utah, Missouri, and Texas.
8. Full ADEX Status: For those wishing for portability to states that do require a psychomotor component, CDCA allows 18 months from the completion of the CSCE OSCE for a candidate to complete both portions of the exam, thereby achieving ADEX Status. Full ADEX status grants portability to almost anywhere in the country.
9. The Best, Most Strategic Option: The ease and flexibility of scheduling the CSCE OSCE and the 18-month window to arrange the second step if desired gives maximum flexibility to candidates from Nevada and elsewhere.

I fully support the permanent acceptance of all alternative licensing exams by the Nevada State Dental Board to include the OSCE from WREB and the CSCE OSCE from CDCA. I also support the permanent acceptance of the manikin in place of live human test subjects.

Thank you,

Stephanie Minor

College of Southern Nevada

Dental Hygiene Class of 2020

**Public Comment:  
Kimberly Grover**

August 25, 2020

MEMORANDUM FOR NEVADA STATE DENTAL BOARD

FROM: KIMBERLY GROVER  
CLASS OF 2020  
DENTAL HYGIENE PROGRAM

SUBJECT: Nevada State Dental Board Accepting All Forms of the Objective Structured Clinical Examination (OSCE) Exams

1. I was the class president of the College of Southern Nevada (CSN) chapter of the Student American Dental Hygiene Association (SADHA) from 2019-2020. I would like to advocate on behalf of myself and my class for the Nevada State Dental Board to fully accept all forms of the OSCE exams offered by the American Board of Dental Examiners (ADEX) and Western Regional Examining Board (WREB) as permanent pathways to full licensure, as well as the acceptance of the Dental Training Manikin in place of the live human patient subject.
2. In 2018, the ADHA House of Delegates announced official advocacy for multiple pathways to initial licensure and support for the elimination of the traditional clinical exam. I am here today advocating for approval of this measure. As of today, over half of the U.S. states have approved these exams due to the Covid-19 pandemic that has no end in sight. This has raised logistical and safety concerns for the students, patients, and examiners.
3. Our Nevada communities are suffering due to a statewide dental hygienist shortage. Hygienists are crucial in the prevention of oral diseases, early detection of oral cancers, and preventative periodontal maintenance. Our community needs us!
4. Your approval of these permanent alternative dental hygiene clinical exams by both ADEX and WREB will allow our class to obtain our licenses safely and ethically during this pandemic.

//SIGNED//  
KIMBERLY L. GROVER  
CSN SADHA President, 2019-2020

**Public Comment - Agenda Item (4):  
Steven Saxe, DMD**

Nevada State Board of Dental Examiners  
Public comment on Agenda item 4 (Old Business)  
6010 S. Rainbow Blvd. Ste A-1  
Las Vegas, NV 89118  
Fax: 702-486-7046

Dear Officers of the Nevada State Board of Dental Examiners,

Thank you for allowing the Nevada State Society of Oral and Maxillofacial Surgeons the opportunity to address the board. We respectfully submit to this board that Oral and Maxillofacial surgeons (OMS) should be exempt from NRS 629.086 for a variety of reasons. OMS, unlike general dentists and other dental specialties, have training and regularly operate on the external aspects of the face in orthognathic surgery, TMJ surgery, facial trauma surgery, surgical correction of congenital deformities and pathology of the face from the frontal sinus down to the mandible. Our training in medicine and surgery is equivalent to that of the medical surgical specialties that operate in the facial region - Otolaryngology (ENT) and Plastic Surgery.

All OMS residents in United States CODA approved programs train from 4 to 6 years, and like their medical surgical colleagues spend the majority of their time in the hospital. Unlike other dental specialists, we are credentialed to admit patients to the hospital and perform history and physicals. Our residency programs include cosmetic training and it is also included on our Board Certifying exam. Additionally, we are credentialed to do the full scope of facial trauma surgery at the level I and II trauma centers in Nevada and at the Sunrise Health system, we do facial trauma surgery to the exclusion ENT and Plastic Surgery.



Therefore, like other surgical specialties that reconstruct the facial region in medicine, we feel our training, experience and current practice exempts us from having to have a separate course for the injection of neuromodulators and soft tissue fillers in the facial region. Thank you again.

Respectfully submitted,

Steven A. Saxe DMD

*President of the Nevada State Society  
Of Oral and Maxillofacial Surgeons*

**Public Comment:**  
**Kirstin Farley**

August 24, 2020

**SUBJECT:** Advocating for the permanent acceptance of all alternative dental hygiene licensure exams by the Nevada State Dental Board. This includes the Objective Structured Clinical Exam (OSCE) from Western Regional Examining Board (WREB) and the American Board of Dental Examiners (ADEX) manikin in place of live human subjects. I would also like to respectfully ask the Board to consider acceptance of the CSCE OSCE from CDCA.

Dear Nevada State Board of Dental Examiners,

In March of 2020, our country took a turn for the worse as the pandemic of COVID-19 spread through. With such a scary time occurring, we were put on a lockdown/quarantine and everything was shut down until further notice. Our schooling was put on hold, along with our finishing date/graduation date and our clinical Boards exam date. Everything was up in the air, and no one seemed to have answers on what was happening, as we were all treading new waters. We were able to take our Written Boards Exam at Prometric once Phase 2 of quarantine was put into effect – our entire class passed and was excited to continue our path to get to our career. We then got the approval to come back to school to finish the remainder requirements needed in order to finish. We were told our new Clinical WREB Exam would be held at CSN Dental Hygiene School in September 2020. This date was quickly canceled, along with the location. UNLV then agreed to host this exam for us but not until November 2020.

I, along with 3 other classmates have finished our requirements and have officially finished Dental Hygiene School. We have been out of school now for 3 weeks, with no job and nothing to do because we cannot get our license until November. We have families and have bills that need to be paid but cannot because of this delay in licensure. With the approval of the OSCE, this will alleviate anymore time taken away from us where we can be making money to support not only our life, but our families.

If the WREB Clinical Exam continues to take place, students would have to find patients that are willing to come in to get the quad cleaned for the exam. As a student during this pandemic, it was extremely difficult to find patients for requirements with a virus being spread daily. With having to look for patients, we are lacking a location to screen and take radiographs for patients for the clinical exam. Our school did an amazing job with infection control to ensure no spread or entrance of the virus in the facility. How would we ensure safety and the same precautions being take at a different location for the WREB exam?

Nevada has a limited number of hygienist and has been in need of new graduates and professionals for a few years. With the lack of our license, we are not able to get out and help our community with our professional skills. We have had two years of clinical practice and competence to ensure the best quality skills are going out into private practice to be professionals. CODA requires at least 570 hours of clinical attendance between the two years of school, and each student in the class of 2020 has well over 600 hours. We are competent and were able to pass all direct observations, formatives, and competencies to show that we can be professional and can work in a private practice setting. We are ready to work clinically in the professional world; we are just withheld because of this licensure exam issue. With the OSCE

being put into effect, it will allow us to start working as soon as possible to get out into the community to give our services as dental hygiene professionals.

In conclusion, I fully support the permanent acceptance of all alternative licensing exams by the Nevada State Dental Board to include the OSCE from WREB and the CSCE OSCE from CDCA. I also support the permanent acceptance of the manikin in place of live human test subjects.

Thank you for your time and considerations,

Kirstin Farley  
CSN SADHA Vice President, 2019-2020  
CSN Dental Hygiene Student - Class 2020

**Public Comment:  
Morgan Heath**

August 24, 2020

**SUBJECT: Approval and acceptance of the Objective Structured Clinical Examination (OSCE) developed by the American Board of Dental Examiners' (ADEX) and Western Regional Examining Board (WREB), as well as manikin-based clinical exams through ADEX, for dental hygiene licensure.**

Dear Nevada State Board of Dental Examiners,

As a student of the dental hygiene class of 2020 graduating from the College of Southern Nevada (CSN) I would like to propose that the Board consider not only the approval of the dental hygiene OSCE through WREB but also that of the ADEX-developed OSCE given through The Commission of Dental Competency Assessments (CDCA) for full licensure. With the permanent approval of these OSCE exams and the manikin-based exam as alternatives for licensure, the dental hygiene students of Nevada can safely take a clinical exam without the risk of interstate travel or further postponement due to the Covid-19 pandemic.

The patient-based dental hygiene board exams have long been debated for their inability to accurately illustrate the skills of the clinician, difficulty in standardizing, ethics regarding the partial treatment of a diseased state, and the payment of patients. With the Covid-19 pandemic, the CSN dental hygiene class of 2020 had great difficulty in finding the necessary patients for simply the completion of program requirements. The same can be said for that of a live-patient board exam. The approval of alternative testing will allow us to become licensed sooner and within a safer environment. As future dental hygienists, we want to begin serving our community and providing for our families as soon as possible. With the current shortage of hygienists in the state of Nevada, we are needed now more than ever.

More than half of the United States has approved alternative exams for licensure due to the Covid-19 pandemic. Nevada can benefit from similar accommodations that will not only allow Nevada students flexibility but also hygienists moving to Nevada to apply with exams they have already taken in other states. I am in support of the acceptance of the alternative clinical licensing exams created by the ADEX and WREB by the Nevada State Board of Dental Examiners for full dental hygiene licensure. These exams are standardized, pose less health risk for all involved, and are more readily available to us as graduates.

Thank you for your consideration,



Morgan Heath

College of Southern Nevada Dental Hygiene Class of 2020

**Public Comment:**  
**Arely Morga**

August 24, 2020

To: The Nevada State Board of Dental Examiners

I would like to express my support of the Nevada State Board of Dental Examiners immediately and fully accepting all OSCE exams from CDCA and WREB as pathways to full licensure, as well as the acceptance of the manikin in place of the live human subject. I support this change not just for the period ending December 31, 2020, but permanently. This would bring Nevada up to date with more than 25 states that have already made these changes. By accepting the manikin as well as the CDCA and WREB OSCE exams, Nevada extends the greatest license portability and offers the most scheduling options to the class of 2020 who has been so greatly affected by the Covid-19 pandemic.

By immediately accepting the OSCE and manikin for ADEX, students can overcome barriers to licensure that have been presented by the Covid-19 pandemic. By accepting multiple paths to licensure, Nevada students can safely achieve licensure right away without risking their own health or that of patients and examiners. By moving to permanently accept these exams, the Board gives more time to students beyond the 12/31/20 deadline originally set by temporary licensure. The acceptance would also offer a financial break since our education was extended by six months resulting in lost income. The OSCE has become accepted in multiple states across the western region which are states that are included in our regional exam. By accepting the OSCE, it would create an equal opportunity for the class of 2020 to coordinate with western region states instead of having our education be pushed back more than it has been already.

I respectfully ask that the Nevada State Dental Board quickly and permanently accept the OSCE exams from both WREB and CDCA as well as the manikin for ADEX status. Please help the dental hygiene class of 2020 get licensed and get to work as soon as possible. Our community needs us!

Thank you.

Arely Morga

College of Southern Nevada

Dental Hygiene Class of 2020



**Public Comment:**  
**Michelle Balmes-Mamalateo**

August 24, 2020

SUBJECT: Approval and permanent acceptance of the OSCE and manikin-based exams given through the WREB and CDCA for full dental hygiene licensure.

Dear Nevada State Dental Board,

I am a 2020 graduating student from the College of Southern Nevada (CSN) asking that the Board consider the permanent acceptance of the OSCE and manikin-based exams given through the WREB and ADEX-CDCA for full dental hygiene licensure. These clinical exams have been developed prior to the Covid-19 pandemic to replace the controversial patient-based exams that have been debated for their unethical use of live patients as test subjects. With the approval of these alternative exams, graduating hygienists can become licensed in a safer and more time-efficient manner. Hygienists moving to Nevada would also be able apply for licensure with the exams they have taken out of state. The growing need for hygienists in the state of Nevada is apparent, so approving these exams would help our communities.

The WREB OSCE only has one remaining test date for the remainder of the year in the country that we can apply to take, whereas the ADEX-developed OSCE has many dates in Nevada alone. This would provide us the flexibility of taking an exam without the risk of traveling out of state or risking the health of ourselves, patients, and examiners.

As CSN 2020 graduates we have satisfied the degree requirements of a Commission on Dental Accreditation (CODA) program and we have all taken and passed the National Board Dental Hygiene Examination (NBDHE). Please allow us the option of proving our clinical competency through these alternative clinical exams as many states throughout the country have done for their students.

Thank you for your time,

Michelle Balmes-Mamalateo

CSN Dental Hygiene Class of 2020

**Public Comment:  
Yu Louie**

Dear Nevada State Board of Dental Examiners,

I am a graduating CSN dental hygiene student of the class of 2020. Upon completing all my requirements, I am so excited to graduate and ready to start my new career. The only thing I need accomplish before I can start my new career is the clinical board exam. The patient-based WREB clinical board we signed up for previously has been delayed twice due to the Covid-19 pandemic. Yet, we do not know whether the patient-based clinical board will be delayed again due to the unpredictability of the pandemic. In addition, I am also concerned about safety for patients, students, and examiners who are in the clinical board exam.

I would like to propose that the Board consider approving of dental hygiene OSCE through WREB as well as the ADEX-developed OSCE. Simulated patient-based clinical board exams provide a safer testing environment during this pandemic. It also standardized the exam contents for all students and would provide better measurements to illustrate the skills of the clinician. Moreover, manikin clinical exams have been adopted widely in United States for dental clinical board exams and dental hygiene clinical board exam.

I urge the Board to approve accepting alternative clinical licensing exams provided by the ADEX and WREB. Accepting alternative exams will allow us to serve our community sooner and would help with the current shortage of dental hygienists in Nevada.

Thank you for your consideration,



Yu Louie

College of Southern Nevada Dental Hygiene Class of 2020

**Public Comment:  
Nicole Miranda**

August 24, 2020

SUBJECT: Acceptance of the Objective Structured Clinical Examination (OSCE) offered by the Western Regional Examination Board (WREB) and the American Board of Dental Examiners' (ADEX), as well as the use of manikin's in place of live patients offered by ADEX.

To: The Nevada State Board of Dental Examiners

I am a student of the CSN Dental Hygiene Program Class of 2020, and I am in support of the permanent acceptance of the OSCE offered by WREB, as well as the use of manikin's in place of live patients that is offered by ADEX. I would also like to propose the consideration of the OSCE developed by ADEX that is given through The Commission of Dental Competency Assessment (CDCA).

The traditional clinical exam has long been considered as subjective and difficult to standardize. Ethics in the treatment of patients are also questionable, especially during a pandemic. Students, patients, and examiners will all be exposed to the risks of COVID-19 if we are forced to move forward with this method of licensing. The ADHA House of Delegates have been in support of eliminating the traditional exam since 2018, and now is the best time to implement the alternative exams. Over half of the United States accepts these alternative exams, permitting hygienists to become licensed in a safe manner.

As of right now, the CSN Class of 2020 is waiting for approval from CSN to be graduated before December. This means that we are unable to utilize the temporary license that has been granted and unable to find patients for our licensing test. CSN has not approved our class in coming back and screening in their facility, leaving us to try and figure out where and how we will find our patients.

The approval of the OSCE and manikins will remove a tremendous amount of uncertainty and will grant us safety and security in becoming licensed. It offers the safest and easiest avenue of testing, multiple testing dates, is readily available, and does not require us to travel out of state. Rather than traveling to another state with a patient, these alternative exams will eliminate these difficulties and potential exposure. Las Vegas is in high demand for dental hygienists, and we are prepared to fill those positions as soon as the Nevada State Board of Dental Examiners approves these exams.

Thank you for time and consideration,



Nicole Miranda

College of Southern Nevada Dental Hygiene Class of 2020

**Public Comment:  
Tiffany Richardson &  
CSN Graduating Class of 2020**

**From:** [Board of Dental Examiners](#)  
**To:** [Angelica L. Bejar](#)  
**Cc:** [Frank DiMaggio](#)  
**Subject:** FW: Proposal for acceptance of alternative exam formats for dental hygiene license  
**Date:** Monday, August 24, 2020 1:11:41 PM  
**Attachments:** [DH Proposal Alt. Exam ORIGINAL - SUBMIT.docx](#)

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**From:** Tiffany Richardson [mailto:████████████████████]  
**Sent:** Monday, August 24, 2020 1:08 PM  
**To:** Board of Dental Examiners  
**Subject:** Proposal for acceptance of alternative exam formats for dental hygiene license

August 24, 2020

To: The Nevada State Board of Dental Examiners/Continuing Education Committee

**Re: Proposal for acceptance of alternative exam formats for dental hygiene licensure**

Note: Please see the attached proposal sent to Governor Sisolak on August 20, 2020

As a member of the College of Southern Nevada (CSN) dental hygiene graduating class of 2020, I write to advocate for the acceptance of all ADEX and WREB alternative pathways to initial licensure. These exams would allow us to better adapt to the unique, COVID-related circumstances we face. Nevada currently requires the completion of a live patient-based, or “psychomotor performance exam” to obtain a dental hygiene license. Section 1(b)(1) of statute NRS 631.240 mandates the successful completion of a “clinical examination,” but does not stipulate the use of a human subject.

Live patient board exams in dentistry have been aggressively criticized by organizations such as the American Dental Hygienists’ Association (ADHA), American Dental Education Association (ADEA), and American Student Dental Association (ASDA). They cite the problematic reliability, validity, and ethical implications of using human subjects for licensure. They have been described as “difficult, if not impossible, to standardize” due to “variables of the patient’s health condition and personal temperament.”

Due to COVID-related obstacles, we are not guaranteed to be able to use our college clinic as a screening facility to find board patients, as insurance liability coverage does not include graduates or non-enrolled students. It is unlikely we will be able to obtain a temporary license (approved by the Board of Dental Examiners on July 14, 2020) in time to screen for our board exam due to delays in the processing of our diplomas by CSN. We will therefore not have the opportunity to screen for board patients under an employer. We will then be placed in the difficult position of either forfeiting our board exam or practicing dentistry without a license by screening patients illegally, devoid of a supervising dentist. Moreover, the live patient exam may be cancelled entirely if Nevada reverts back to phase I COVID restrictions in the fall, or if an examiner tests positive for COVID. We are looking for a secure, safe, certain, and fair solution to our unique situation. The CSN dental hygiene program boasts a 100% clinical board exam pass rate. The program not only meets, but exceeds the Commission on Dental



Accreditation (CODA) requirements. We ask that this committee have confidence in our reputable program and the quality of the students it produces by supporting our efforts to become healthcare professionals in these challenging times.

Sincerely,

Tiffany Richardson  
CSN Dental Hygiene Class of 2020



Dental Hygiene Students, College of Southern Nevada  
Graduating Class of 2020

August 20, 2020

The Honorable Steve Sisolak  
Governor, State of Nevada  
Grant Sawyer State Office Building  
555 East Washington Ave., Suite 5100  
Las Vegas, NV 89101

**Re: Proposal for acceptance of alternative exam formats for dental hygiene licensure**

Dear Governor Sisolak:

We, the College of Southern Nevada (CSN) dental hygiene class of 2020, write to propose a change to the interpretation of Nevada Dentistry and Dental Hygiene statute NRS 631.240, which would specifically include the acceptance of alternative clinical exams for initial licensure. These exams would allow us to better adapt to the unique, COVID-related circumstances we face. Nevada currently requires the completion of a live patient-based, or “psychomotor performance exam” to obtain a dental hygiene license. Section 1(b)(1) of statute NRS 631.240 mandates the successful completion of a “clinical examination,” but does not stipulate the use of a human subject:

**NRS 631.240 Examination for license to practice dentistry; issuance of certificate of registration.**

1. Any person desiring to obtain a license to practice dentistry in this State, after having complied with the regulations of the Board to determine eligibility:
  - (a) Except as otherwise provided in [NRS 622.090](#), must present to the Board a certificate granted by the Joint Commission on National Dental Examinations which contains a notation that the applicant has passed the National Board Dental Examination with an average score of at least 75; and
  - (b) Except as otherwise provided in this chapter, must:
    - (1) Successfully pass a clinical examination approved by the Board and the American Board of Dental Examiners; or
    - (2) Present to the Board a certificate granted by the Western Regional Examining Board which contains a notation that the applicant has passed a clinical examination administered by the Western Regional Examining Board.
2. The Board shall examine each applicant in writing on the contents and interpretation of this chapter and the regulations of the Board.
3. All persons who have satisfied the requirements for licensure as a dentist must be registered as licensed dentists on the board register, as provided in this chapter, and are entitled to receive a certificate of registration, signed by all members of the Board.

Live patient board exams in dentistry have been aggressively criticized by organizations such as the American Dental Hygienists’ Association (ADHA), American Dental Education Association (ADEA), and American Student Dental Association (ASDA). They cite the problematic reliability, validity, and ethical implications of using human subjects for licensure. In 2016, the ASDA critiqued live patient exams for their delivery of incomplete, substandard care and described them as “difficult, if not impossible, to standardize” due to “variables of the patient’s health condition and personal temperament.” Patients present with a variety of anatomical and pathological differences, making true calibration unreachable. Furthermore, the ASDA observed that patients are often inhumanely “paid, purchased, sold, or traded” between students during the search for board candidates. In 2018, the ADHA House of Delegates announced official

The Honorable Steve Sisolak  
August 20, 2020  
Page 2

advocacy for multiple pathways to initial licensure and support for the elimination of the traditional clinical exam.

Alternative exams such as the Objective Structured Clinical Examination (OSCE) and manikin options are fair, appropriate, and standardized ways to assess the breadth and precision of our skills. Just over half of all U.S. states have approved these exams in light of 2020 COVID logistical and safety concerns: Utah, Oregon, Texas, Kansas, Minnesota, Missouri, Louisiana, Wisconsin, Alabama, Florida, Illinois, Michigan, Indiana, Ohio, Kentucky, Tennessee, Mississippi, South Carolina, North Carolina, West Virginia, Virginia, New York, Maryland, Rhode Island, Connecticut, Vermont, New Jersey, Massachusetts, and the federal district of Washington, D.C.

These alternative exams are offered and recognized by the American Board of Dental Examiners (ADEX) and the Western Regional Examining Board (WREB) to satisfy the clinical exam requirement for licensure. Our class is currently scheduled to take the traditional live-patient clinical WREB board exam November 6-8 of this year at the University of Nevada, Las Vegas (UNLV). Due to COVID-related obstacles, we are unable to use our college clinic as a screening facility to find board patients, as insurance liability coverage does not include graduates or non-enrolled students. It is unlikely we will be able to obtain a temporary license (approved by the Board of Dental Examiners on July 14, 2020) in time to screen for our board exam due to delays in the processing of our diplomas by CSN. We will therefore not have the opportunity to screen for board patients under an employer. We will then be placed in the difficult position of either forfeiting our board exam or practicing dentistry without a license by screening patients illegally, devoid of a supervising dentist. Moreover, the live patient exam may be cancelled entirely if Nevada reverts back to phase I COVID restrictions in the fall.

Our community is suffering from a statewide dental hygienist shortage. The U.S. Bureau of Labor Statistics reports that the demand for hygienists is growing by an astounding 11% in this state. Nevada does not currently supply enough hygienists to meet this need. Prophylactic dental care, periodontal maintenance, and oral cancer screenings provided by hygienists are crucial to the prevention of oral disease in the community. In other states, such as Ohio, patients are backlogged for months without prophylactic dental care due to a similar shortage. We do not wish the same hardships for Nevada.

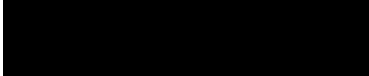
Acceptance of alternative dental hygiene clinical exams (from both ADEX and WREB) by Nevada would allow our class to obtain our licenses safely, legitimately, and ethically during this pandemic. It would also guarantee mobility and licensure portability for hygienists licensed in other states who migrate here. These hygienists will help reduce the burden of our current dental

hygiene shortage and stimulate the local economy. We very much appreciate your time and consideration on this matter. Please feel free to contact us with any questions or concerns.

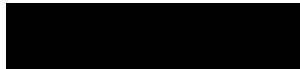
Sincerely,



Tiffany M. Richardson  
CSN Dental Hygiene Class of 2020



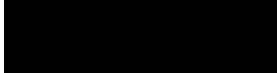
Arely Morgia  
CSN Dental Hygiene Class of 2020



Stephanie Minor  
CSN Dental Hygiene Class of 2020



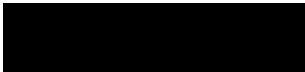
Yu Luie  
CSN Dental Hygiene Class of 2020



Morgan Heath  
CSN Dental Hygiene Class of 2020



Anissa Kiser  
CSN Dental Hygiene Class of 2020



Kimberly L. Grover  
CSN Dental Hygiene Class of 2020



Alex Osmundson  
CSN Dental Hygiene Class of 2020



Michelle Balmes-Mamalateo  
CSN Dental Hygiene Class of 2020



Chelsea Ganotice  
CSN Dental Hygiene Class of 2020



Nicole Miranda  
CSN Dental Hygiene Class of 2020

Kirstin Farley  
CSN Dental Hygiene Class of 2020



**Public Comment:  
Chelsea Ganotice**

**SUBJECT:** Consideration of the adapting and accepting Objective Structured Clinical Examination (OSCE) created by ADEX and WREB as alternative testing for dental hygiene students experiencing difficulties obtaining a license during COVID-19 pandemic and possible adaptation for a permanent dental hygiene licensure.

Dear Nevada State Board of Dental Examiners,

I am a student from the College of Southern Nevada's (CSN) Dental Hygiene program due to graduate in December 2020. Although I have finished all requirements of the program this Summer session three weeks ago, due to CSN's policies, I will not be able to officially graduate until this Winter. Eight of our students are also still waiting to return to campus to complete clinical requirements. During this time, our graduation date and approaching board dates creates difficulties to obtaining a dental hygiene license or temporary license. To allow our eager students to enter the workforce, I respectfully propose for the Board to consider the approval of the Objective Structured Clinical Examination (OSCE) through WREB and ADEX provided by the Commission of Dental Competency Assessments (CDCA) for full licensure. Allowing these alternative tests will provide our class with a faster road to licensure and allow us to safely stay in state for testing during this challenging time.

During the COVID-19 pandemic, our students are also facing difficulties finding a board patient in our quickly approaching board dates. With most of our class still awaiting to return to clinic to finish their clinical requirements, this poses more problems in obtaining a license. Accepting both versions of the OSCE will also help relieve financial burden from many of our families that are struggling facing this pandemic, due to its lower costs and ability to be taken in state.

With more half the country accepting these tests as alternatives to licensure, Nevada would also be able to benefit from this standardized test. This would permit more out of state hygienists to license in Nevada and fill the need of dental hygienists in our state. As a 2020 graduate, I fully support the permanent acceptance of the OSCE exams through CSCE and WREB. Acceptance of these exams will allow us to work the soonest and be able to serve our community.

Thank you for your time,

Chelsea Ganotice  
CSN Dental Hygiene Student, Class of 2020

**Public Comment:**  
**Anissa Kiser**



**SUBJECT: Approval and acceptance of the Objective Structured Clinical Examination (OSCE) developed by the American Board of Dental Examiners' (ADEX) and Western Regional Examining Board (WREB), as well as manikin-based clinical exams through ADEX, for dental hygiene licensure.**

Dear Nevada State Board of Dental Examiners,

I write to you today as a soon to dental hygiene graduate to voice concerns over my future as a hygienist. A career I carefully choose and put many years into achieving. As you know, as of March this year the city shut down due to the Covid-19 pandemic. The ripple effect of this measure to protect the city is continuing to effect many. My class would have graduated in May, but we were unable to complete our clinics and graduate. This contributed to an increased the shortage of hygienists in this city. I write to you to today to discuss alternative options such as a manikin based or OSCE for us recent and soon to be graduates as a pathway for us to receive our licenses so we can help our community as soon as possible.

The board recently approved temporary licenses for us so we would be able to get to work sooner, with the stipulation that we must take a clinical exam after the pandemic is over. While this measure helps us tremendously right now, it does have its disadvantages in the future. While we don't know when the pandemic will be over, having to take the clinical after will likely prove difficult for our class. Since many clinicals have been cancelled during this time, there is going to be a back up of students trying to take exams. This will be especially difficult for us since there very limited spaces in Nevada for us to take the exam, which may force us to have to go to another state. This again, would be difficult for many of us since going out of states means having to pay for your patients travel and accommodations. Many of our resources were already stretched thin, but having school extended and being unable to work means we are stretched even thinner and may not have the funds to do this. We have been provided the opportunity from WREB to do a live patient clinical exam hosted at UNLV on November 6<sup>th</sup>-8th, but many of us may not be able to complete that exam. We still need to finish up clinical requirements, our grades need to be changed, we need to apply for graduation (which can take 3-4 weeks). We have been informed by CSN that we will not be provided with time to screen to find a patient for our board exam and have been told to apply for temporary licensing and then get a job in an office and hope the dentist will allow us to screen there. This option however is likely not achievable in the short time before this clinical exam, since once we complete our clinics in school it would take 3-4 weeks to process grades and then once we can apply for a license we have been told it will take 6-8 weeks to approve. Even if we were able to apply for a temporary license today, we still would not have time to find a job and find a patient for boards. Having a live patient clinical exam is just not logical at this time.

In addition, many people have raised concerns over the morality and ethics of having a live patient exam. Not only are we asking someone to sit for us for a test, but often we are paying them to be our test subject and providing incomplete treatment for them. In addition, the ability to standardize this test for each student is impossible.

Because our class was unable to graduate, this left a great need for hygienists in the city of Las Vegas. Many offices are in need of a hygienists but cannot fill the positions and cannot provide care for their patient. We ask that you approve and allow the acceptance of alternative testing like ADEX

August 24, 2020

manikin-based exams AND the OSCE formats through both ADEX and WREB for full licensure. While approving WREBs OSCE may be helpful, they have limited slots and this option alone would not help us at this time. Many states have already approved these formats for either limited or full licensure, and we believe that this option would greatly benefit Nevada. If accepted as a form of permanent licensure, not only would it guarantee a pathway for your graduating class to be licensed so that they can help our community but it would also allow other hygienists from other states that have been allowed to take this exam to be licensed here as well as giving future students options for licensure.

Sincerely,

Anissa Kiser

College of Southern Nevada Dental Hygiene Class of 2020

**Public Comment:  
SNDHA**



Dear Nevada State Board of Dental Examiners: Education Committee,

Thank-you for taking the time to meet and discuss pertinent issues facing the dental hygiene community. Like many other parts of our lives, the Covid-19 pandemic has drastically affected the dental community, including the dental hygiene students from the College of Southern Nevada (CSN) who were faced with unprecedented challenges that are preventing them from becoming licensed oral healthcare providers and begin practicing dental hygiene in our local community.

The Southern Nevada Dental Hygienists' Association (SNDHA) is part of a tripartite composing of the American Dental Hygienists' Association (ADHA) and the Nevada Dental Hygienists' Association (NDHA). SNDHA is the only association to represent dental hygienists in Southern Nevada, including dental hygiene students.

The SNDHA is in support of the WREB administrated Objective Structured Clinical Examination (OSCE) as an alternative clinical exam for the 2020 CSN Dental Hygiene graduates. In 2018 the ADHA House of Delegate Adopted the resolution "to support the elimination of the patient procedure-based, single encounter clinical examination for candidates who are graduates of Commission on Dental Accreditation accredited dental hygiene program"<sup>1</sup>.

The purpose of a clinical licensure examinations is for clinicians to demonstrate their knowledge to a governing agency prior to serving the public. SNDHA believes the OSCE is the best alternative for these students to become licensed oral healthcare providers. This will allow the NSDBE to maintain its responsibility of protecting the public's health and safety and to promote the welfare of the state by regulating the competency and quality of professional healthcare providers under its jurisdiction.

The OSCE has been established as an alternative to live patient exams and uses a variety of assessments to comprehensively test student clinical knowledge. The WREB Dental Hygiene OSCE is a multiple-choice written component that assesses multi-faceted components of dental hygiene care. This is a comprehensive overview of dental hygiene knowledge, radiographic interpretation, AAP staging and grading, extra and intra oral assessment and risk assessment, care plan development, and assessment and treatment of the periodontium. The exam is an avenue to test the skills of an entry-level student by replacing the current clinical examination<sup>2</sup>.

Thank you for your consideration:

Lilian Braner RDH, BSDH  
**SNDHA Past-President**

Antonio Ventura RDH, BSDH  
**SNDHA Immediate Past-President**

[1.https://www.adha.org/resources-docs/single\\_encounter\\_exam\\_changes\\_v2.pdf](https://www.adha.org/resources-docs/single_encounter_exam_changes_v2.pdf)

2. [https://wreb.org/Exams/Updates/WREB\\_Exam\\_COVID-19\\_Options\\_for\\_2020\\_Summary%20Table.pdf](https://wreb.org/Exams/Updates/WREB_Exam_COVID-19_Options_for_2020_Summary%20Table.pdf)