



PROPOSED RULE MAKING

CR-102 (June 2024) (Implements RCW 34.05.320)

Do NOT use for expedited rule making

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STATE OF WASHINGTON
FILED

DATE: January 07, 2026

TIME: 2:24 PM

WSR 26-03-002

Agency: Department of Health – Dental Quality Assurance Commission

Original Notice

Supplemental Notice to WSR

Continuance of WSR

Preproposal Statement of Inquiry was filed as WSR 24-15-022; or

Expedited Rule Making--Proposed notice was filed as WSR _____; or

Proposal is exempt under RCW 34.05.310(4) or 34.05.330(1); or

Proposal is exempt under RCW _____.

Title of rule and other identifying information: Dental licensure requirements. The Dental Quality Assurance Commission (commission) is proposing amendments to WAC 246-817-135 to remove requirements pertaining to federal or state tax numbers when applying for licensure without an examination. The commission is also proposing amendments to WAC 246-817-160 to explain the educational and training pathways that graduates of non-accredited schools or programs must complete to obtain comprehensive dental training that meets minimum clinical competency requirements.

Hearing location(s):

Date:	Time:	Location: (be specific)	Comment:
March 6, 2026	10:00 a.m.	<p>In-Person: Washington State Department of Health TC2 Room 166 111 Israel Rd. S.E. Tumwater, WA 98501-5414</p> <p>Webinar Registration: Please follow the Zoom link to register for the virtual hearing, which will give you instructions to either join the meeting on a device, or to call in to the meeting on the phone:</p> <p>Zoom Link: https://us02web.zoom.us/webinar/register/WN_bZ1Vu4_hSjedMRtMy3IM5A</p> <p>After registering, you will receive a confirmation email containing information about joining the webinar.</p>	The public hearing will be hybrid. Participants can attend at either the physical location or virtually by registering via Zoom.

Date of intended adoption: March 6, 2026 (Note: This is **NOT** the effective date)

Submit written comments to:

Name: Debbie Gardner, Program Manager
Address: P.O. Box 47852, Olympia, WA 98504-7852
Email: dental@doh.wa.gov
Fax: N/A

Assistance for persons with disabilities:

Contact: Debbie Gardner, Program Manager
Phone: 360-236-4893
Fax: N/A
TTY: 711

Other: <https://fortress.wa.gov/doh/policyreview>

Email: dental@doh.wa.gov

Beginning: The date and time of this filing.

Other:

By: February 24, 2026 at 11:59 p.m.

By: February 24, 2026

Purpose of the proposal and its anticipated effects, including any changes in existing rules:

The commission is proposing amendments to WAC 246-817-135 to revise requirements related to federal or state tax numbers and WAC 246-817-160 to better explain the educational and training pathways that graduates of non-accredited schools must complete to obtain comprehensive dental training that meets minimum clinical competency requirements.

To protect an applicant's privacy and security, the commission is proposing amending WAC 246-817-135 to remove the requirement of providing federal and state tax numbers from applications for licensure without an examination, as it is not necessary data to protect public health when meeting licensing requirements.

The commission has been receiving an increased number of applicants who have received training from non-accredited schools or programs. Due to the varying degree of education and training from non-accredited dental schools and programs, the commission is proposing amendments to WAC 246-817-160 to explain the educational and training pathways graduates of non-accredited schools must complete to pursue licensure in Washington state.

Clinical education and training requirements were last reviewed by the commission in 2016. Providing clear standards will ensure that minimum clinical competency requirements are met and that graduates of non-accredited schools obtain similar levels of comprehensive education and training as dentists who graduate from Commission on Dental Accreditation (CODA) accredited schools.

The commission is proposing the following amendments to explain the pathways graduates of non-accredited schools must complete to pursue licensure in Washington state:

- Successful completion of at least two years of predoctoral dental education obtained at a CODA-accredited dental school; or
- Successful completion of at least one additional CODA-accredited postdoctoral academic year of education in a General Practice Residency (GPR) or Advanced Education in General Dentistry (AEGD) residency.

Reasons supporting proposal:

Rulemaking is necessary to remove barriers for dentists applying for licensure without examination and to provide clear educational and training pathways for graduates of non-accredited schools. The proposed rule amendments meet the intent of the underlying statutes of establishing, monitoring, and enforcing qualifications for licensure and consistent standards of practice as part of the commission's purpose. Providing clear standards for dental licensure ensures appropriate comprehensive dental training to meet minimum competency requirements and best practices for patient safety.

Statutory authority for adoption: RCW 18.32.0365

Statute being implemented: RCW 18.32.002, 18.32.0365, 18.32.040, 18.32.215, and 18.32.222

Is rule necessary because of a:

- Federal Law? Yes No
- Federal Court Decision? Yes No
- State Court Decision? Yes No

If yes, CITATION:

Agency comments or recommendations, if any, as to statutory language, implementation, enforcement, and fiscal matters: None

Name of proponent: (person or organization) Dental Quality Assurance Commission

Type of proponent: Private. Public. Governmental.

Name of agency personnel responsible for:

	Name	Office Location	Phone
Drafting	Debbie Gardner	111 Israel Road SE, Tumwater, WA 98501	360-236-4893
Implementation	Debbie Gardner	111 Israel Road SE, Tumwater, WA 98501	360-236-4893
Enforcement	Debbie Gardner	111 Israel Road SE, Tumwater, WA 98501	360-236-4893

Is a school district fiscal impact statement required under [RCW 28A.305.135](#)? Yes No

If yes, insert statement here:

The public may obtain a copy of the school district fiscal impact statement by contacting:

- Name
- Address
- Phone
- Fax
- TTY
- Email
- Other

Is a cost-benefit analysis required under [RCW 34.05.328](#)?

- Yes: A preliminary cost-benefit analysis may be obtained by contacting:
Name: Debbie Gardner
Address: P.O. Box 47852, Olympia, WA 98504-7852
Phone: 360-236-4893
Fax: N/A
TTY: 711
Email: dental@doh.wa.gov
Other: N/A
- No: Please explain:

Regulatory Fairness Act and Small Business Economic Impact Statement

Note: The [Governor's Office for Regulatory Innovation and Assistance \(ORIA\)](#) provides support in completing this part.

(1) Identification of exemptions:

This rule proposal, or portions of the proposal, **may be exempt** from requirements of the Regulatory Fairness Act (see [chapter 19.85 RCW](#)). For additional information on exemptions, consult the [exemption guide published by ORIA](#). Please check the box for any applicable exemption(s):

This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.061](#) because this rule making is being adopted solely to conform and/or comply with federal statute or regulations. Please cite the specific federal statute or regulation this rule is being adopted to conform or comply with, and describe the consequences to the state if the rule is not adopted.

Citation and description:

This rule proposal, or portions of the proposal, is exempt because the agency has completed the pilot rule process defined by [RCW 34.05.313](#) before filing the notice of this proposed rule.

This rule proposal, or portions of the proposal, is exempt under the provisions of [RCW 15.65.570](#)(2) because it was adopted by a referendum.

This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025](#)(3). Check all that apply:

- | | |
|---|---|
| <input type="checkbox"/> RCW 34.05.310 (4)(b)
(Internal government operations) | <input type="checkbox"/> RCW 34.05.310 (4)(e)
(Dictated by statute) |
| <input type="checkbox"/> RCW 34.05.310 (4)(c)
(Incorporation by reference) | <input type="checkbox"/> RCW 34.05.310 (4)(f)
(Set or adjust fees) |
| <input type="checkbox"/> RCW 34.05.310 (4)(d)
(Correct or clarify language) | <input checked="" type="checkbox"/> RCW 34.05.310 (4)(g)
((i) Relating to agency hearings; or (ii) process requirements for applying to an agency for a license or permit) |

This rule proposal, or portions of the proposal, is exempt under [RCW 19.85.025](#)(4). (Does not affect small businesses).

This rule proposal, or portions of the proposal, is exempt under RCW _____.

Explanation of how the above exemption(s) applies to the proposed rule: The entire proposed rule is exempt under RCW 19.85.025(4) as it only affects the dental professional's license which does not meet the definition of "small business" in RCW 19.85.020. A portion of the rule, WAC 246-817-135, is exempt under RCW 34.05.310(4)(g)(ii) because it repeals a requirement to submit proof of federal or state tax numbers for a Dental Licensure without Examination.

(2) Scope of exemptions: Check one.

- The rule proposal: Is fully exempt. (*Skip section 3.*) Exemptions identified above apply to all portions of the rule proposal.
- The rule proposal: Is partially exempt. (*Complete section 3.*) The exemptions identified above apply to portions of the rule proposal, but less than the entire rule proposal. Provide details here (consider using [this template from ORIA](#)):
- The rule proposal: Is not exempt. (*Complete section 3.*) No exemptions were identified above.

(3) Small business economic impact statement: *Complete this section if any portion is not exempt.*

If any portion of the proposed rule is **not exempt**, does it impose more-than-minor costs (as defined by RCW 19.85.020(2)) on businesses?

- No Briefly summarize the agency's minor cost analysis and how the agency determined the proposed rule did not impose more-than-minor costs.
- Yes Calculations show the rule proposal likely imposes more-than-minor cost to businesses and a small business economic impact statement is required. Insert the required small business economic impact statement here:

The public may obtain a copy of the small business economic impact statement or the detailed cost calculations by contacting:

- Name
- Address
- Phone
- Fax
- TTY
- Email
- Other

Date: January 7, 2026

Name: Bryan Swanson, DDS

Title: Dental Quality Assurance Commission Chair

Signature:



WAC 246-817-135 Dental licensure without examination—Eligibility and application requirements. For individuals holding a dentist credential in another U.S. state or territory, to be eligible for Washington state dental license without examination, the applicant must provide:

- (1) A completed application on forms provided by the secretary;
- (2) Applicable fees under WAC 246-817-990;
- (3) A verification by a U.S. state or territory board of dentistry (or equivalent authority) of an active credential to practice dentistry, without restrictions, and whether the applicant has been the subject of final or pending disciplinary action;
- (4) Proof of graduation from an approved dental school under WAC 246-817-110 (2) (a):
 - (a) The only acceptable proof is an official, posted transcript sent directly from such school;
 - (b) Graduates of nonapproved dental schools must meet the requirements under RCW 18.32.215 (1) (b).
- (5) Proof that the applicant is currently engaged in the practice of dentistry:
 - (a) Dentists serving in the United States federal services as described in RCW 18.32.030(2) must provide documentation from their commanding officer regarding length of service, duties and responsibilities, and any adverse actions or restrictions;
 - (b) Dentists employed by a dental school approved under WAC 246-817-110 (2) (a) must provide documentation from the dean or appropriate administrator of the institution regarding the length and terms of employment, duties and responsibilities, and any adverse actions or restrictions;
 - (c) Dentists in a dental residency program must provide documentation from the director or appropriate administrator of the residency program regarding length of residency, duties and responsibilities, and any adverse actions or restrictions; or
 - (d) Dentists practicing dentistry for a minimum of (~~twenty~~) 20 hours per week for the four consecutive years preceding application, in another U.S. state or territory must provide:
 - (i) Address of practice location(s);
 - (ii) Length of time at the location(s);
 - (iii) A letter from all malpractice insurance carrier(s) defining years when insured and any claims history; and
 - (iv) (~~Federal or state tax numbers; and~~ ~~(v)~~) DEA numbers if any.
- (6) Proof of successful completion of a commission approved written jurisprudence examination;
- (7) A recent 2" x 2" photograph, signed, dated, and attached to the application; and
- (8) Authorization for background inquiries to other sources may include, but are not limited to, the national practitioner data bank and drug enforcement agency.

WAC 246-817-160 Graduates of nonaccredited schools. (1) An applicant for Washington state dental licensure, who is a graduate of a dental school or college not accredited by the Commission on Dental Accreditation shall provide to the Dental Quality Assurance Commission (commission):

(a) Materials listed in WAC 246-817-110 (1), (3), (5) ~~((through (8), and (10) through (13))~~), (6), (7), and (9) through (12);

(b) Official school transcript or diploma with dental degree listed transcribed to English if necessary;

~~(c) ((Evidence of successful completion of at least two additional predoctoral or postdoctoral academic years of dental education.~~

~~(i) Additional predoctoral or postdoctoral dental education completed prior to July 1, 2018, must be obtained at a dental school in the United States or Canada, approved, conditionally or provisionally, by the Commission on Dental Accreditation.~~

~~(ii) Additional predoctoral or postdoctoral dental education completed after July 1, 2018, must be obtained in a dental program in the United States or Canada,))~~ Additional predoctoral or postdoctoral academic years of dental education resulting in a certificate attesting to the successful graduation from that program. This can be satisfied by:

(i) Successful completion of at least two years of predoctoral dental education obtained at a dental school, approved, conditionally or provisionally, by the Commission on Dental Accreditation; or

(ii) Successful completion of at least one additional postdoctoral academic year of education in a general practice residency (GPR) or advanced education in general dentistry (AEGD) residency that has been approved, conditionally or provisionally, by the Commission on Dental Accreditation ((and include clinical training)); and

(d) An applicant for Washington state dental licensure must provide proof of successful completion of:

(i) An approved practical/clinical examination under WAC 246-817-120; or

(ii) A qualifying residency program under RCW 18.32.040 (3)(c).

(2) Upon completion of the requirements in subsection (1)(a) through (c) of this section, an applicant may be eligible to take the practical examination as approved in WAC 246-817-120 (2) through (4).

(a) The commission may issue examination approval up to six months before an applicant has completed the ~~((two))~~ additional predoctoral or postdoctoral academic years of dental education.

(b) An applicant must provide a letter from the school where the ~~((two))~~ additional predoctoral or postdoctoral academic years ~~((is))~~ are being obtained indicating expected date of education completion.