

# Significant Legislative Rule Analysis

WAC 246-817-135 and  
246-817-160  
Rules Concerning Dental  
Licensure without  
Examination and Graduates  
of Non-accredited Schools

November 2025

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## SECTION 1

### **A brief description of the proposed rule including the current situation/rule, followed by the history of the issue and why the proposed rule is needed.**

The Dental Quality Assurance Commission (commission) is proposing amendments to WAC 246-817-135 to eliminate requirements related to federal or state tax numbers when applying for licensure without an examination.

To protect an applicant's privacy and security, the commission is proposing removing the requirement of providing federal and state tax numbers, as it is not necessary to protect public health when meeting licensing requirements. Additionally, requiring proof of federal or state tax numbers creates barriers for applicants who do not have these. Rulemaking is necessary to remove barriers for dentists applying for licensure without exam.

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.

The commission has been receiving an increased number of applicants who have received training from non-accredited schools or programs. Due to the varying degrees of education and training from non-accredited dental schools and programs, the commission is proposing amending the rules 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 dental 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 that 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.

The commission attempted to clarify training requirements through rulemaking in 2016 that added "clinical training" to the additional two years of dental education. The

commission discovered that there is still ambiguity with the requirements, both for applicants and credentialing staff.

The proposed rule language provides two pathways to dental licensure and specifies the postdoctoral education as a GPR or AEGD residency. This provides clear, comprehensive dental training standards for graduates of non-accredited dental schools. Additionally, it ensures appropriate clinical training requirements to meet minimum competency requirements and best practices for patient safety. In Washington state, general dentists and specialty trained dentists are issued the same credential. WAC 246-817-420 gives a licensed dentist the legal authority to practice in all areas of dentistry and also the authority to confine their practice in areas within the scope of their education, training, and experience. Providing clear pathways to dental licensure will ensure consistency regarding minimum clinical competency requirements, and explaining the pathways for dental licensure will close existing loopholes.

Rulemaking is necessary to explain the pathways graduates of non-accredited schools must complete to pursue licensure in Washington state and to ensure appropriate, comprehensive dental training to meet minimum clinical competency requirements and best practices for patient safety. Additionally, the proposed rule language closes existing loopholes.

## SECTION 2

### Significant Analysis Requirement

As defined in RCW 34.05.328, portions of the rule require significant analysis because they make significant amendments to a policy or regulatory program.

The following SA Table 1 identifies rule sections or portions of rule sections that have been determined exempt from significant analysis based on the exemptions provided in RCW 34.05.328(5)(c)(i).

**SA Table 1. Summary of Sections not requiring Significant Analysis**

<b>WAC Section and Title</b>	<b>Description of Proposed Changes</b>	<b>Rationale for Exemption Determination</b>
WAC 246-817-135, Dental licensure without examination–Eligibility and application requirements.	Removing the requirement that applicants submit federal or state tax numbers.	This is exempt under RCW 34.05.328(5)(c)(i) because it repeals the requirement to provide federal or state tax numbers as part of the application process

## SECTION 3

### **Goals and objectives of the statute that the rule implements.**

RCW 18.32.040 charges the commission with requiring every applicant for a license to practice dentistry to present satisfactory evidence of graduation from a dental college, school, or dental department of an institution approved by the commission.

RCW 18.32.002 charges the commission with regulating the competency and quality of professional health care providers under its jurisdiction by establishing, monitoring, and enforcing qualifications for licensure, continuing education, consistent standards of practice, continuing competency mechanisms, and discipline. Rules, policies, and procedures developed by the commission must promote the delivery of quality health care to the residents of the state.

RCW 18.32.215 charges the commission with ensuring that applicants applying via the licensure without examination pathway have completed the educational and training requirements for dental licensure in Washington state.

The rule amendments meet the intent of the underlying statute's goals and objectives of establishing, monitoring, and enforcing qualifications for licensure by removing the requirement of providing federal and state tax numbers and reducing barriers for dentists applying for licensure without exam. Additionally, the proposed rule amendments meet the general goals and specific objectives by creating an opportunity for graduates of non-accredited schools to meet educational and training requirements by specifying the commission's approved pathways to dental licensure, offering an additional, shorter option, and promoting the delivery of quality health care by ensuring minimum clinical competency requirements are met through comprehensive dental training, while creating an additional opportunity to meet the standard.

The commission previously amended the additional educational requirements in WAC 246-817-160 to include clinical training and has discovered that the current rule language is not specific enough to ensure clear and consistent clinical training standards. The current proposed rule amendments explain acceptable clinical training requirements by specifying one additional postdoctoral academic year of education in a CODA-accredited GPR or AEGD residency or two additional years of predoctoral education at a CODA-accredited dental school. Providing two clearly defined educational and training pathways for graduates of non-accredited schools will promote the delivery of quality health care by ensuring that the commission's minimum clinical competency requirements are met.

Historically, Substitute House Bill (SHB) 2881 passed in 2008 and created an educational alternative to allow foreign-trained dentists to meet credentialing requirements and created a new section RCW 18.32.222. SHB 2881 required the commission to provide the Governor with a report by November 15, 2009, that detailed

recommendations for appropriate standards for issuing a license to foreign-trained dentists.

The commission's recommendations in the 2009 report were to continue the licensing standards as created by SHB 2881, requiring the applicant to have practiced in another state for at least four years and complete a one-year postdoctoral residency approved by the commission. RCW 18.32.215 currently allows for this pathway to licensure as an alternative to the additional educational requirements in WAC 246-817-160.

## SECTION 4

### **Explanation of why the rule is needed to achieve the goals and objectives of the statute, including alternatives to rulemaking and consequences of not adopting the proposed rule.**

The proposed changes in WAC 246-817-135 meet the intent of the underlying statutes' goals and objectives of establishing, monitoring, and enforcing qualifications for licensure by removing the requirement of providing federal and state tax numbers, as it is not necessary information to protect public health when meeting licensing requirements. Additionally, requiring proof of federal or state tax numbers creates barriers for applicants who do not have these. Rulemaking is necessary to remove barriers for dentists applying for licensure without exam.

The proposed changes in WAC 246-817-160 meet the intent of the underlying statutes' general goals and specific objectives by creating an opportunity for graduates of non-accredited schools to meet educational and training requirements by specifying the commission's approved pathways to dental licensure and offering an additional, shorter option, and promoting the delivery of quality health care by ensuring minimum clinical competency requirements are met through comprehensive dental training, while creating an additional opportunity to meet the standard.

Providing two clear pathways to licensure in Washington state for applicants who do not graduate from a CODA-accredited school will promote the delivery of quality health care and ensure that minimum clinical competency requirements are met. Additionally, the proposed amendments meet the intent of the underlying statutes requirement that applicants must provide satisfactory evidence of graduation from a dental college, school, or dental department of an institution approved by the commission by rewording the requirements to specify how many years of predoctoral education at a CODA-accredited dental school, and how many years in a CODA-accredited postdoctoral residency satisfy the clinical training requirement necessary for public health and safety.

The commission assessed and determined that there are no feasible alternatives to rulemaking. The proposed amendments meet the intent of the underlying statutes by removing the requirement of providing federal and state tax numbers, specifying the educational and training requirements for applicants pursuing dental licensure in Washington state who do not graduate from a CODA-accredited school or program, and providing clear standards to ensure that minimum clinical competency requirements are met. Without amending the graduates of non-accredited schools rule, applicants pursuing dental licensure who do not graduate from an approved school may not complete comprehensive dental training to meet minimum clinical competency requirements for licensure in Washington state. Although the proposed rule limits the specialty pathways to licensure, it no longer requires two additional years; it offers a one and two-year pathway. Additionally, clearly explaining comprehensive dental education

and training requirements is necessary to be established in rule by the commission, and will close existing loopholes and promote public health and safety.

Rulemaking is appropriate to promote clear, consistent training and educational requirements for graduates from non-accredited schools. The proposed rules specify training and educational requirements for dental applicants pursuing licensure in Washington State and offer two options for applicants who graduated from non-accredited schools: successful completion of at least one additional postdoctoral academic year of education in a GPR or AEGD residency that has been approved by CODA, or successful completion of at least two years of predoctoral dental education obtained at a CODA-accredited dental school. The current requirement is successful completion of at least two additional predoctoral or postdoctoral academic years of dental education at a CODA-accredited school or program, and additional dental education completed after July 1, 2018, must be completed at a CODA-accredited program that includes clinical training.

## SECTION 5

**Analysis of the probable costs and benefits (both qualitative and quantitative) of the proposed rule being implemented, including the determination that the probable benefits are greater than the probable costs.**

### **WAC 246-817-160 Graduates of non-accredited schools.**

**Description:** The existing rule describes licensure requirements for graduates of non-accredited schools and requires successful completion of at least two additional predoctoral or postdoctoral academic years of dental education at a CODA-accredited school or program. Additional dental education completed after July 1, 2018, must be completed at a CODA-accredited program that includes clinical training.

The proposed rule offers two options for applicants who are graduates of non-accredited schools to meet Washington state licensure standards and explains that comprehensive dental training can be obtained by completing the following pathways:

- 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 postdoctoral academic year of education in a GPR or AEGD residency that has been approved by CODA.

The proposed rule changes ensure comprehensive dental training that meets minimum clinical competency requirements via two pathways:

- Predoctoral education: Two years of predoctoral dental education at a CODA-accredited dental school satisfies the commission's requirement of clinical education and training; or
- Postdoctoral education: One year of postdoctoral training, if it is a CODA-approved GPR or AEGD residency, also satisfies the commission's requirement of clinical education and training.

**Cost(s):** The commission does not anticipate any additional costs to comply with this proposed rule. The commission's intent has not changed, so the cost should stay the same; however, the cost could potentially decrease for a graduate of a non-accredited school who completes one year of postdoctoral training, as long as it is from a CODA-approved GPR or AEGD residency.

Applicants who are graduates of non-accredited schools may still choose from two options to satisfy the clinical educational and training requirements for Washington state licensure. This ensures that graduates of non-accredited schools obtain similar levels of comprehensive education and training as dentists who graduate from CODA-accredited schools. The proposed amendments offer shorter pathways to licensure than the educational alternative pathway in RCW 18.32.215.

Typical education and training requirements for dentists trained in the United States<sup>1</sup> or Canada<sup>2</sup>:

- Four-year undergraduate education that results in a bachelor’s degree; and
- Four-year predoctoral program at a CODA-accredited dental school that results in a Doctor of Dental Surgery (DDS) or Doctor of Dental Medicine (DMD) degree.

Typical education and training requirements for internationally trained dentists<sup>3</sup>:

- Five<sup>4</sup> to six years<sup>5</sup> of education that results in a Bachelor of Dental Surgery (BDS) degree.

Proposed rule changes:

- The current rule language requires two additional years of pre or postdoctoral training for graduates of non-accredited schools.
- The proposed rule language offers a one and two-year pathway to licensure for graduates of non-accredited schools.

**Benefit(s):** The benefit of the proposed rule is that it explains the educational and training requirements for graduates of non-accredited schools, offers a one and two-year option, provides clear standards to ensure minimum clinical competency requirements are met, and ensures that graduates of non-accredited schools obtain similar levels of comprehensive education and training as dentists who graduate from CODA-accredited schools.

## Summary of all Cost(s) and Benefit(s)

**SA Table 2. Summary of Section 5 probable cost(s) and benefit(s)**

WAC Section and Title	Probable Cost(s)	Probable Benefit(s)
WAC 246-817-160 Graduates of non-accredited schools	No anticipated costs	Explains approved educational and training requirements, increases options, and ensures minimum clinical competency requirements are met through comprehensive dental training.

<sup>1</sup> Kimmy Gustafson, “Dentist,” HealthcareDegree. August 1, 2024, available online at: [How to Become a Dentist - Education, Licensure & Salary.](#)

<sup>2</sup> Dentalheight NDEB, “How to become a licensed dentist in Canada,” Dentalheight. April 16, 2025, available on: [Dentist in Canada | 7 Essential steps to follow : NDEB.](#)

<sup>3</sup> Anayat Durrani, “How Foreign Dentists Can Get U.S. Degrees, Training,” U.S. News. February 12, 2025, available online at: [How Foreign Dentists Can Get U.S. Degrees, Training | Best Graduate Schools | U.S. News.](#)

<sup>4</sup> Maharajha Ganga Singh Dental College & Research Centre, “BDS course (Bachelor of Dental Surgery), Duration, Eligibility criteria, Future & Scope,” Maharajha Ganga Singh Dental college & Research Centre. 2018, available on: [BDS course \(Bachelor of Dental Surgery\), Duration, Eligibility criteria, Future & Scope.](#)

<sup>5</sup> Chloe Meng Jiang, Takashi Nishioka, Guang Hong, Hao Yu, Chang-yuan Zhang, Chun Hung Chu, “Mapping of dental graduates’ career paths in Hong Kong, Japan and mainland China,” National Library of Medicine. November 3, 2022, available on: [Mapping of dental graduates’ career paths in Hong Kong, Japan and mainland China - PMC.](#)

## **Determination**

### **Probable Benefits greater than Probable Costs**

It was determined that the probable benefits of explaining the comprehensive dental education and training requirements to ensure minimum clinical competency are greater than any probable costs. The commission does not anticipate any additional costs to comply with the rule, and it may decrease costs due to the additional explanation on specifically which one and two-year CODA-accredited education and training options meet the commission's standards for graduates from non-accredited schools pursuing licensure in Washington state.

## SECTION 6

**List of alternative versions of the rule that were considered including the reason why the proposed rule is the least burdensome alternative for those that are required to comply and that will achieve the goals and objectives of the proposed rule.**

The commission conducted open public rules workshops virtually during Continuing Competency Committee meetings held on October 30, 2024, December 11, 2024, March 5, 2025, April 21, 2025, and during a hybrid business meeting held on April 25, 2025, where the proposed rule amendments regarding the education and training requirements for graduates of non-accredited schools were discussed. During the Continuing Competency Committee meetings, ideas discussed included trying to define the term “clinical training” and adding general dental skills to the existing clinical training requirements. Additionally, removing the requirement of providing federal and state tax numbers was discussed during the Continuing Competency Committee meetings.

The commission worked closely with interested parties to understand the varying degrees of dental educational schools and programs that graduates from non-accredited schools complete, and to determine what educational and training requirements would provide clear standards to ensure minimum clinical competency requirements are met. It was determined that specifying the acceptable pathways to achieve comprehensive dental training standards was the best option to ensure appropriate clinical training requirements that meet minimum clinical competency and best practices for patient safety.

To encourage public participation, comment, and engagement, notifications for the workshops were sent to the commission’s GovDelivery distribution list. No comments were received. The commission approved the draft rules as written at the April 25, 2025, business meeting.

The proposed amendments, which require graduates of non-accredited schools to successfully complete at least one additional postdoctoral academic year of education in a GPR or AEGD residency that has been approved by CODA, or successful completion of at least two years of predoctoral dental education obtained at a CODA-accredited dental school, will provide clear standards to ensure minimum clinical competency requirements are met. This ensures that graduates of non-accredited schools obtain similar levels of comprehensive education and training as dentists who graduate from CODA-accredited schools.

The commission considered not changing the existing rules. This alternative is not consistent with the commission’s directive to regulate the competency and quality of professional health care providers under its jurisdiction by establishing, monitoring, and enforcing qualifications for licensure. Not specifying educational and training requirements for graduates of non-accredited schools pursuing dental licensure in Washington state does not allow for clear standards to ensure minimum clinical

competency. Furthermore, not removing the requirement of federal and state tax numbers creates barriers for applicants who do not have these.

## SECTION 7

**Determination that the rule does not require those to whom it applies to take an action that violates requirements of another federal or state law.**

The rule does not require those to whom it applies to take action that violates the requirements of federal or state law.

## SECTION 8

**Determination that the rule does not impose more stringent performance requirements on private entities than on public entities unless required to do so by federal or state law.**

The rule does not impose more stringent performance requirements on private entities than on public entities.

## SECTION 9

**Determination if the rule differs from any federal regulation or statute applicable to the same activity or subject matter and, if so, determine that the difference is justified by an explicit state statute or by substantial evidence that the difference is necessary.**

The rule does not differ from any applicable federal regulation or statute.

## SECTION 10

**Demonstration that the rule has been coordinated, to the maximum extent practicable, with other federal, state, and local laws applicable to the same activity or subject matter.**

There are no other known federal, state, or local laws applicable to dental licensure requirements in Washington state.