

Significant Legislative Rule Analysis
WAC 246-817-120 Examination content
January 6, 2016

Describe the proposed rule, including a brief history of the issue, and explain why the proposed rule is needed.

The Dental Quality Assurance Commission (commission) is proposing amendments to update the name of one examination organization with a recent name change. Amendments also ensure that complete practical examinations are required as two examination organizations allow the periodontal exam as optional. Proposed rule clearly identifies examination subject content required for licensure. Additionally, the proposed rule indicates U.S. state or territory and Canada clinical examinations are acceptable.

Is a Significant Analysis required for this rule?

Yes, as defined in RCW 34.05.328 the proposed rule requires a significant analysis.

Clearly state in detail the general goals and specific objectives of the statute that the rule implements.

RCW 18.32.002, in part, establishes qualifications for licensure as part of the commission's purpose. RCW 18.32.040 requires every applicant for a license to practice dentistry in Washington State pass an examination. The commission must approve the practical examination that consists of subjects as determined by the commission. As allowed by RCW 18.32.0365, the commission has established acceptable practical examinations in WAC 246-817-120. The proposed rule modifies:

- Adds clinical examination subject content;
- Adds Canada clinical examinations as acceptable;
- Clarifies that state is a U.S. state or territory;
- Updates name of one organization with a recent name change; and
- Adds Canadian National Examining Board as acceptable written examination.

Explain how the department determined that the rule is needed to achieve these general goals and specific objectives. Analyze alternatives to rulemaking and the consequences of not adopting the rule.

The commission has identified the need to provide clarity for acceptable examinations.

Rules are necessary to clarify the current examination requirements. The commission has determined that there are no feasible alternatives to rulemaking because in order to be enforceable, approved examinations must be in rule. If the proposed rules are not adopted, the commission will be hampered in its ability to provide clear requirements for acceptable examinations for initial licensure.

Explain how the department determined that the probable benefits of the rule are greater than the probable costs, taking into account both the qualitative and quantitative benefits and costs and the specific directives of the statute being implemented.

Rule Overview – WAC 246-817-120 Examination content

The proposed rule modifies clinical examination subject content and identifies that U.S. state or territory and Canada clinical examinations are acceptable. Additionally, the proposed rule updates the name of an organization with a recent name change and adds the Canadian National Dental Examining Board examination as it is already approved in WAC 246-817-110.

Rule Cost/Benefit Analysis

There is no cost for licensed dentists to comply with this proposed rule. The current rule and proposed changes only apply to dentists whom need to take the written or clinical examinations to meet requirements for a dentist license in Washington State. Clear examination requirements are necessary to inform potential applicants of Washington State dentist license requirements. A benefit of the proposed rule is reduce licensure barrier. Dentists whom passed the National Dental Examining Board of Canada clinical examination will now be eligible for licensure in Washington State.

Cost Benefit Summary

There are costs to take the written and clinical examinations. The proposed rule does not impose any new costs for these examinations.

Identify alternative versions of the rule that were considered, and explain how the department determined that the rule being adopted is the least burdensome alternative for those required to comply with it that will achieve the general goals and specific objectives state previously.

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Descriptions of alternatives considered

One alternative considered did not include the Canadian National Dental Examination in subsection (1)(a).

Least burdensome determination

The written Canadian National Dental Examination was added to the rule for clarity and consistency with WAC 246-817-110 (3). The proposed rule is the least burdensome option as it provides dentists applying for Washington State dentist license clear requirements of which examinations are acceptable for licensure.

Determine 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 an action that violates requirements of federal or state law.

Determine 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.

Determine 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.

Demonstrate 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 applicable laws.