

**MEETING OF THE VIRGINIA BOARD OF DENTISTRY**  
**EMERGENCY BOARD BUSINESS MEETING**

MEETING CONVENED AT: 9960 MAYLAND DRIVE, HENRICO VIRGINIA 23233  
(LOCATION CURRENTLY CLOSED TO THE PUBLIC)

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| <u>TIME</u>    |   | <u>PAGE</u>   |
|----------------|---|---------------|
| <b>3:00 PM</b> | <b>Call to Order – Dr. Augustus A. Petticolas, Jr., President</b>   |               |
|                | <b>Roll Call of Participants – Jamie C. Sacksteder, Deputy Executive Director</b>   |               |
|                | <b>Public Comment – Dr. Augustus A. Petticolas, Jr., President</b>  |               |
|                | <b>Board Discussion/ Action</b>   |               |
|                | <u>Reconsideration of the Board of Dentistry’s May 8, 2020 decision on the 2020 Dental Hygiene Clinical Examination Requirement</u> | <b>1 - 17</b> |

ADJOURN

**Instructions for Accessing Virtual Board Meeting and Providing Public Comment**

- **ACCESS:** Perimeter Center building access is closed to the public due to the COVID-19 pandemic. To observe this virtual meeting, use one of the options below. Participation capacity is limited and is on a first come, first serve basis due to the capacity of CISCO WebEx technology.
- **PUBLIC COMMENT:** Comments will be received during the public comment period from those persons who have submitted an email to [kathryn.brooks@dhp.virginia.gov](mailto:kathryn.brooks@dhp.virginia.gov) **no later than 1:00 PM on Friday, May 29, 2020** indicating that they wish to offer comment. Comment may be offered by these individuals when their names are announced by the Board President. Comments must be restricted to 3-5 minutes each.
  - Public participation connections will be muted following the public comment periods.
  - Please call from a location without background noise.
  - Dial **804-367-4622** to report an interruption during the broadcast.
  - FOIA Council *Electronic Meetings Public Comment* form for submitting feedback on this electronic meeting may be accessed at:  
<http://foiacouncil.dls.virginia.gov/sample%20letters/welcome.htm>

**JOIN BY AUDIO ONLY**

**+1-408-418-9388**

Meeting number (access code): **790 045 142**

Meeting password: **BODentistry2020 (26336847 from phones and video systems)**

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# VCU

## School of Dentistry

Office of the Dean

520 N. 12<sup>th</sup> Street  
Box 980566  
Richmond, VA 23298-0566

804.828.9184  
Fax: 804.828.6072  
TDD: 1.800.828.1120

May 13, 2020

Dr. David E. Brown  
Director, Virginia Department of Health Professions  
Perimeter Center  
9960 Mayland Drive, Suite 300  
Henrico, Virginia 23233-1463

Dear Dr. Brown,

In light of the current public health crisis, I am writing to request that in your capacity as Director of the Virginia Department of Health Professions, you reconsider a recommendation made by the Virginia Board of Dentistry on May 8, 2020 to deny a proposal by dental hygiene programs in the Commonwealth to modify licensure examinations for the current year only. As you are aware, the VCU School of Dentistry and the VCU Dental Hygiene program have been working diligently to ensure that our senior students may "cross the finish line" and graduate as scheduled in spring 2020. This is consistent with Secretary Qarni's guidance dated April 9, 2020 and is in recognition of the significant investments that our students have made in their education. Specifically, the dental hygiene request at issue was as follows:

***Requests from dental hygiene programs and students for the Board to accept as a clinical examination the Computer Simulated Clinical Exam (CSCE) as administered by the Council of Interstate Testing Agency (CITA) and equivalent clinical examinations given by a testing agency accepted by the Board, in addition to the written National Board Dental Hygiene Exam (NBDHE).***

This request was based on identical requests already granted in other states, including Oregon, Utah, Kansas, Texas, Missouri, and West Virginia. The CSCE is a comprehensive exam that uses high level questions to establish candidate competency. Notably, throughout the course of their enrollment, dental hygiene students are also required to undergo numerous, extensive scaling competency assessments while in their programs. They perform 150 to 200% more scaling procedures than dental students and are assessed in various levels of case difficulty.

In the same Board of Dentistry meeting held on May 8, 2020, the Board considered and unanimously approved the following request that relates to candidates for 2020 dental licensure:

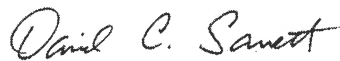
***Requests from dental schools and dental students for the Board to accept as a clinical examination a simulated manikin exercise in restorative dentistry and waive the scaling exercise with live patients in an examination given by a testing agency accepted by the Board.***

In accepting this recommendation and waiving the requirement of a scaling exercise for dental applicants, the Board cited the lack of a validated simulation examination for scaling as part of its rationale. However, when the dental hygiene request was considered, several Board members posited that there is a testing agency that currently offers a manikin-based scaling exam. However, it is important to note that this agency currently does not test any of the dental hygiene programs in Virginia and to our knowledge the test they employ has not been shown to be psychometrically sound.

Given the seemingly contradictory decisions rendered as it relates to the existence of proven scaling examinations, we would respectfully request that the dental hygiene recommendation proffered to the Board of Dentistry be timely reconsidered. The current crisis calls for flexibility in response, particularly as it relates to ensuring the adequacy of our vital oral health workforce pipeline.

I am most happy to discuss this issue at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "David C. Sarrett".

David C. Sarrett, DMD, MS  
Dean, School of Dentistry



# VCU Medical Center

**School of Dentistry  
Department of General Practice  
Dentistry**

Lyons Dental Building, 4th floor, Room 406  
520 North 12th Street  
P.O. Box 980566  
Richmond, Virginia 23298-0566

**804 828-2977 • Fax: 804 828-3159**  
TDD: 1-800-828-1120  
[www.dentistry.vcu.edu](http://www.dentistry.vcu.edu)

May 15, 2020

Dr. David Brown  
Director, Virginia Department of Health Professions  
Perimeter Center  
9960 Mayland Drive, Suite 300  
Henrico, VA 23233-1463

Dear Dr. Brown,

During this unprecedented and uncertain time for our country as we respond to the COVID-19 pandemic, I am writing to request that in your capacity as Director of the Virginia Department of Health Professions, you reconsider a recommendation made by the Virginia Board of Dentistry on May 8, 2020 to deny a proposal by dental hygiene programs in the Commonwealth to modify licensure examinations for the current year only. The VCU Dental Hygiene program has been working diligently to ensure that our senior students complete didactic courses, required assessments and graduate as scheduled in spring 2020. This is consistent with Secretary Qarni's guidance dated April 9, 2020 and is in recognition of the significant investments that our students have made in their education. Specifically, the dental hygiene request at issue was as follows:

*Requests from dental hygiene programs and students for the Board to accept as a clinical examination the Computer Simulated Clinical Exam (CSCE) as administered by the Council of Interstate Testing Agency (CITA) and equivalent clinical examinations given by a testing agency accepted by the Board, in addition to the written National Board Dental Hygiene Exam (NBDHE).*

This request was based on identical requests already granted in several other states. The CSCE is a comprehensive, clinic-based exam that uses high level questions to establish candidate competency. The CSCE is a 96% occupational analysis, meaning that the test analyzes 96% of tasks that a hygienist will perform. In addition, dental hygiene students are required to undergo numerous, extensive scaling competency assessments evaluated by calibrated faculty while in their programs. At VCU they perform 150 to 200% more scaling procedures than dental students and are assessed in various levels of case difficulty.

In the same Board of Dentistry meeting held on May 8, 2020, the Board considered and unanimously approved the following request that relates to candidates for 2020 dental licensure:

*Requests from dental schools and dental students for the Board to accept as a clinical examination a simulated manikin exercise in restorative dentistry and waive the scaling exercise with live patients in an examination given by a testing agency accepted by the Board.*

In accepting this recommendation and waiving the requirement of a scaling exercise for dental applicants, the Board cited the lack of a validated simulation examination for scaling as part of its rationale. However, when the dental hygiene request was considered, several Board members posited that there is a testing agency that currently offers a manikin-based scaling exam. However, it is important to note that this agency currently does not test any of the dental

hygiene programs in Virginia and to our knowledge the test they employ has not been shown to be psychometrically sound.

Given the contradictory decisions rendered as it relates to the existence of proven scaling examinations, I would respectfully request that the dental hygiene recommendation proffered to the Board of Dentistry be timely reconsidered. The current crisis calls for flexibility in response, particularly as it relates to ensuring the adequacy of our vital oral health workforce pipeline.

Please don't hesitate to contact me if you would like to discuss further. I can be reached at 804-380-0614 or [mrmcgregor@vcu.edu](mailto:mrmcgregor@vcu.edu).

Regards,

A handwritten signature in cursive script that reads "Michelle McGregor".

Michelle McGregor, RDH, BS, M.Ed.  
Director and Associate Professor, Dental Hygiene Program  
VCU School of Dentistry  
[mrmcgregor@vcu.edu](mailto:mrmcgregor@vcu.edu)  
804-828-9096



## Southern Regional Testing Agency, Inc.

4698 Honeygrove Road, Suite 2 | Virginia Beach, Virginia 23455-5934

Tel. (757) 318-9082 | Fax (757) 318-9085 | [www.srta.org](http://www.srta.org)

Contact: Jillian Metzger  
615-242-8856 ext.118  
[jillian@hallstrategies.com](mailto:jillian@hallstrategies.com)

### FOR IMMEDIATE RELEASE

#### **SRTA OFFERS DENTAL HYGIENE NON-PATIENT LICENSURE EXAMINATION AS ALTERNATIVE** *The Southern Regional Testing Agency advances its manikin-based licensure exam amid testing complications due to COVID-19*

VIRGINIA BEACH, VIRGINIA (May 14, 2020) – The Southern Regional Testing Agency, Inc. (SRTA) has announced a complete manikin-based licensing examination for dental hygiene students in response to the testing delays and complications faced by COVID-19. The virus has brought numerous challenges to the dental profession, including the closure of dental practices and clinics across the nation due to safety concerns. These factors make finding live patients for skills assessments for state licensure for graduates nearly impossible.

“We have foreseen some of these issues and know that the technology is there, so we have been developing a complete, manikin-based dental hygiene licensing exam for a year,” said SRTA President-Elect Gerry Walker, D.M.D. “In response to the coronavirus pandemic, SRTA has approved the release of its complete manikin-based Dental Hygiene module, using cutting-edge dental products that are highly effective in simulating a live patient’s dental anatomy.

“It is imperative that our dental hygienists’ competencies and skills are adequately and properly assessed through clinical, hands-on testing,” said Walker. “Therefore, a safe, non-patient-based licensing exam must be available to these hygiene students.”

The non-patient based SRTA dental hygiene exam is a thorough assessment that includes proper tissue management, detecting various types of dental calculus, and completing a partial oral prophylaxis and partial periodontal pocket depth assessment. There is also an optional Intra-/Extra-Oral computerized examination that assesses oral manifestations and diseases, and healthy tissue management.

“While it remains at the discretion of each state’s licensing boards on whether to accept this alternative assessment module,” said SRTA Executive Director Jessica Bui. “SRTA continues its commitment to being responsive and actionable during these challenging times for our industry.”

#### **About the Southern Regional Testing Agency (SRTA)**

SRTA has been a trusted testing agency in the U.S. since 1975. Its innovative approach to examinations, along with the wide network of examiners from across the country, afford it the opportunity to be the most responsive testing agency to meet the present challenges facing the dental industry.

If interested in learning more about SRTA’s manikin-based exam opportunity, please contact Jessica Bui ([jbui@srta.org](mailto:jbui@srta.org)) or (757-318-9082).

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AMERICAN BOARD OF DENTAL EXAMINERS, INC.

William Pappas, D.D.S., President  
Jeffery Hartsog, D.M.D., Vice-President  
Conrad McVea, III, D.D.S., Secretary  
Renee McCoy-Collins, D.D.S., Treasurer  
Bruce Barrette, D.D.S., Past President

## ADEX™ Approves Use of Typodont In Dental Hygiene and Dental Periodontal Scaling Clinical Licensure Examinations

2020 ADEX™ Press Release

For Release: May 18, 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 a selected typodont as an option in the dental hygiene licensure examination and the dental periodontal scaling challenge. The typodont selected will be used in calculus detection, calculus removal, and periodontal probing exercises for the ADEX Dental Hygiene Patient Treatment Clinical Examination after completing a feasibility study under the supervision of ACS Ventures, LLC. This will offer dental hygiene licensure boards/agencies the choice to accept this non-patient professional proficiency demonstration or continue to accept the patient required participation for dental hygiene.

Further, the feasibility study included analysis of periodontal scaling proficiency utilizing the selected typodont and was accepted by the ADEX Board of Directors to be offered as an option for the periodontal scaling exercise part of the ADEX Dental Licensure Clinical Examination. This too would give licensure boards, that intend to accept a non-patient clinical assessment of candidates for licensure, an option for such acceptance of demonstrated proficiency.

“While facing circumstances as a result of the COVID-19 crisis, ADEX has endeavored to critically and psychometrically provide licensing jurisdictions options given the current conditions in delivery of dental education, dental treatment, and independent dental skills evaluation. With the previous addition of the CompeDont™ to the ADEX™ dental testing repertoire, licensure boards and agencies have additional non-patient assessment modalities upon which to aid in licensure evaluation during these unprecedented times. These hands-on skill assessments are joined by our computerized Objective Clinical Simulated Examination (OSCE) in both dentistry and dental hygiene, the longest running, continually maintained OSCE in the dental profession in North America,” said ADEX President William G. Pappas, D.D.S. “ADEX™ has taken additional steps in dental hygiene by approving and offering both patient and non-patient demonstration options, if desired by licensing boards, to meet the current unique obstacles presented by the COVID-19 crisis,” added Beth Jacko-Clemence, R.D.H, and Chair of the ADEX Dental Hygiene Examination Committee. This committee utilized practicing licensed hygienists, hygiene educators, and hygiene students to conduct the feasibility study prior to acceptance and adoption of the use of this particular typodont for examination purposes.

The offering of the typodont based dental hygiene examination and typodont based dental periodontal scaling exercise will commence this summer in the examination series currently scheduled to resume by both The Commission on Dental Competency Assessments (CDCA) and the Council of Interstate Testing Agencies (CITA). As always, it will be at the discretion of state licensing boards/agencies whether to accept these additional offerings in testing modality.

For any questions about the ADEX™ examination please contact: ADEX™ at [office@adexexams.org](mailto:office@adexexams.org) For questions about the administration of ADEX examinations, please contact The Commission on Dental Competency Assessments at: [www.cdcaexams.org](http://www.cdcaexams.org) or the Council of Interstate Testing Agencies at [www.citaexam.com](http://www.citaexam.com)

## Sandra Reen

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**Subject:** FW: Waiver request for Dental Hygiene Licensure requirements for 2020

**From:** David Sarrett <dcsarrett@vcu.edu>

**Sent:** Tuesday, May 19, 2020 12:54 PM

**To:** Brown, David <david.brown@dhp.virginia.gov>

**Cc:** Richard D Archer <rdarcher@vcu.edu>; Michelle McGregor <mrmcgregor@vcu.edu>; Karah L Gunther/FS/VCU <klgunther@vcu.edu>; Reen, Sandra (DHP) <Sandra.Reen@dhp.virginia.gov>

**Subject:** Re: Waiver request for Dental Hygiene Licensure requirements for 2020

Dr. Brown,

Thank you for your quick response. The action taken by the Dental Hygiene Exam Committee for ADEX will allow a manikin replacement for live patient dental hygiene exams in the future. However, unlike the dental manikin exam, this hygiene exam is in the early developmental stages. The manikin manufacturer was contacted this morning and has not yet begun production of the new simulator. In fact, it appears that the new hygiene typodonts will not be ready for actual use until mid to late summer.

This delay in availability puts the dental hygiene classes of 2020 in a bind. As their employing dentists get busy resuming patient care they will not be able to start working. Therefore, this new manikin exam may prove useful in the future but we still ask that the original waiver be granted for the dental hygiene class of 2020.

Thank you

On Mon, May 18, 2020 at 5:06 PM Brown, David <david.brown@dhp.virginia.gov> wrote:

Dr. Sarrett,

I read this release today and am hoping this will address the important issue you and others have raised. Am I correct?

Thanks, David

**David E. Brown, DC**  
**Director, Virginia Department of Health Professions**

On Thu, May 14, 2020 at 11:58 AM David Sarrett <dcsarrett@vcu.edu> wrote:

Dear Dr. Brown,

Please accept this request for consideration following the outcome of the Board of Dentistry's decision last week.

Thank you

--

David C. Sarrett, D.M.D., M.S.  
Dean, School of Dentistry &  
Associate Vice President for Health Sciences - Faculty Affairs





Brooks, Kathryn <kathryn.brooks@dhp.virginia.gov>

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## Decision to continue to hold ADEX/CDCA Patient exam Dental hygiene Grads 2020

1 message

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**Courtney Brice** <cep2360@email.vccs.edu>

Tue, May 26, 2020 at 2:10 PM

To: kathryn.brooks@dhp.virginia.gov

Tuesday, May 26, 2020

To whom it may concern,

Hello, my name is Courtney Brice. I am a recent graduate from the accredited Northern Virginia Community College Dental Hygiene program. I currently reside in Woodbridge Virginia and attended the two-year program at the Medical Education Campus located in Springfield, Virginia.

I am writing to you today to inform you on a very urgent and important matter regarding the recent dental hygiene graduates from this learning institute. Due to the unexpected and extraordinary circumstances due to the COVID-19 pandemic, I am writing on behalf of my fellow graduates from Northern Virginia Community College. We are imploring you to overturn the decision to have the college proceed with the 2020 ADEX/CDCA Patient Treatment Clinical Examination, whether it be on a live patient or a manikin.

It is absurd that the Virginia Board of Dentistry is requiring this alternative form of testing, especially during this difficult time. The "manikin" that they would need to create for proper assessment does not even exist yet. It will not be ready until the end of July. Students had planned on graduating in May and getting their dental hygiene license in the summer to begin working. To have to wait until the end of July, and then also wait to get approval for licensure, will further delay the graduates from starting their careers, thus contributing to more economic hardship. The CDCA has created and sent out examination modifications. These modifications involve every student to purchase their own PPE, for this one day, and one-time exam. How is the CDCA expecting all students, including faculty, to obtain the proper PPE when it is sold out in most places? Having us, the students, modify the way we would normally scale to completion, furthermore, trying to obtain our own PPE, and wait until the end of July, thus delaying our licensing and making it impossible to practice, is unacceptable. This decision to continue to hold this test at all, is affecting when these graduates can join the dental workforce and is contributing to their financial hardship that they are have

already been experiencing. It is not just or fair to make these students wait, months after graduating, to take a test to show their competency when the students in this program have been scaling patient's teeth for 2 years. constantly supervised; checked and graded by faculty. The instructors, faculty, and dean of our program have written and expressed how we have proven our competency to perform the tasks necessary to enter the workforce, giving another reason as to why the clinical exam should be waived for the class of 2020. Students are also still having to take two different computerized exams as well. The entire Medical Education Campus is locked down until fall semester begins at the end of August. To have to open up this facility for one day is not only a waste of time for faculty, instructors, and students, but it is also a waste of valuable resources and materials that should be reserved.

It is also important to mention that the Board of Dentistry has waived the "manikin scaling portion" of the dental exam for dental students. This directly contradicts the Board of Dentistry's decision to require the exam for dental hygiene students. Other parts of the country have also cancelled this particular portion of the exam. If dental students, and dental hygiene students across the country have been allowed licensure without this form of testing to be done, why would the state of Virginia not do everything in their power to reduce the hardship of the state's future dental hygienists, and cancel this exam for the year 2020?

Please help these future dental hygienists join the dental workforce faster. We implore you to reconsider the decision to continue having the CDCA/ADEX Patient Treatment Clinical Exam and/or manikin-based exam. These graduates have worked too hard for too long to have to wait even longer for their dream to come true.

Sincerely,

Dental Hygiene Graduates of 2020  
Northern Virginia Community College

## Sandra Reen

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**From:** Eun Hyun Lee <el2263@email.vccs.edu> on behalf of Eun Hyun Lee  
**Sent:** Tuesday, May 26, 2020 3:34 PM  
**To:** david.brown@dhp.virginia.gov; enfcomplaints@dhp.virginia.gov;  
sandra.reen@dhp.virginia.gov; jamie.sacksteder@dhp.virginia.gov;  
kathryn.brooks@dhp.virginia.gov; tracey.arrington-edmonds@dhp.virginia.gov;  
devona.sykes@dhp.virginia.gov; deborah.southall@dhp.virginia.gov;  
donald.levitin@dhp.virginia.gov  
**Subject:** Decision to continue to hold ADEX/CDCA Patient Exam Dental Hygiene Grads 2020

To whom it may concern,

Hello, my name is Eun Hyun Lee. I am a recent graduate from the accredited Northern Virginia Community College Dental Hygiene program. I currently reside in Woodbridge Virginia and attended the two-year program at the Medical Education Campus located in Springfield, Virginia.

I am writing to you today to inform you on a very urgent and important matter regarding the recent dental hygiene graduates from this learning institute. Due to the unexpected and extraordinary circumstances due to the COVID-19 pandemic, I am writing on behalf of my fellow graduates from Northern Virginia Community College. We are imploring you to overturn the decision to have the college proceed with the 2020 ADEX/CDCA Patient Treatment Clinical Examination, whether it be on a live patient or a manikin.

It is absurd that the Virginia Board of Dentistry is requiring this alternative form of testing, especially during this difficult time. The “manikin” that they would need to create for proper assessment does not even exist yet. It will not be ready until the end of July. Students had planned on graduating in May and getting their dental hygiene license in the summer to begin working. To have to wait until the end of July, and then also wait to get approval for licensure, will further delay the graduates from starting their careers, thus contributing to more economic hardship. The CDCA

has created and sent out examination modifications. These modifications involve every student to purchase their own PPE, for this one day, and one-time exam. How is the CDCA expecting all students, including faculty, to obtain the proper PPE when it is sold out in most places? Having us, the students, modify the way we would normally scale to completion, furthermore, trying to obtain our own PPE, and wait until the end of July, thus delaying our licensing and making it impossible to practice, is unacceptable. This decision to continue to hold this test at all, is affecting when these graduates can join the dental workforce and is contributing to their financial hardship that they are have already been experiencing. It is not just or fair to make these students wait, months after graduating, to take a test to show their competency when the students in this program have been scaling patient's teeth for 2 years. constantly supervised, checked and graded by faculty. The instructors, faculty, and dean of our program have written and expressed how we have proven our competency to perform the tasks necessary to enter the workforce, giving another reason as to why the clinical exam should be waived for the class of 2020. Students are also still having to take two different computerized exams as well. The entire Medical Education Campus is locked down until fall semester begins at the end of August. To have to open up this facility for one day is not only a waste of time for faculty, instructors, and students, but it is also a waste of valuable resources and materials that should be reserved.

It is also important to mention that the Board of Dentistry has waived the "manikin scaling portion" of the dental exam for dental students. This directly contradicts the Board of Dentistry's decision to require the exam for dental hygiene students. Other parts of the country have also cancelled this particular portion of the exam. If dental students, and dental hygiene students across the country have been allowed licensure without this form of testing to be done, why would the state of

Virginia not do everything in their power to reduce the hardship of the state's future dental hygienists, and cancel this exam for the year 2020?

Please help these future dental hygienists join the dental workforce faster. We implore you to reconsider the decision to continue having the CDCA/ADEX Patient Treatment Clinical Exam and/or manikin-based exam. If you know who needs to see this letter to implement this change, please forward it to them. These graduates have worked too hard for too long to have to wait even longer for their dream to come true.

Sincerely,

Dental Hygiene Graduates of 2020  
Northern Virginia Community College

## Sandra Reen

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**From:** Karina Jimenez <kkj269@email.vccs.edu> on behalf of Karina Jimenez  
**Sent:** Tuesday, May 26, 2020 3:43 PM  
**To:** enfcomplaints@dhp.virginia.gov; sandra.reen@dhp.virginia.gov;  
jamie.sacksteder@dhp.virginia.gov; kathryn.brooks@dhp.virginia.gov  
**Subject:** Decision to continue to hold ADEX/CDCA Patient exam Dental hygiene Grads 2020

To whom it may concern,

Hello, my name is Karina Jimenez. I am a recent graduate from the accredited Northern Virginia Community College Dental Hygiene program. I currently reside in Woodbridge Virginia and attended the two-year program at the Medical Education Campus located in Springfield, Virginia.

I am writing to you today to inform you on a very urgent and important matter regarding the recent dental hygiene graduates from this learning institute. Due to the unexpected and extraordinary circumstances due to the COVID-19 pandemic, I am writing on behalf of my fellow graduates from Northern Virginia Community College. We are imploring you to overturn the decision to have the college proceed with the 2020 ADEX/CDCA Patient Treatment Clinical Examination, whether it be on a live patient or a manikin.

It is absurd that the Virginia Board of Dentistry is requiring this alternative form of testing, especially during this difficult time. The “manikin” that they would need to create for proper assessment does not even exist yet. It will not be ready until the end of July. Students had planned on graduating in May and getting their dental hygiene license in the summer to begin working. To have to wait until the end of July, and then also wait to get approval for licensure, will further delay the graduates from starting their careers, thus contributing to more economic hardship. The CDCA has created and sent out examination modifications. These modifications involve every student to purchase their own PPE, for this one day, and one-time exam. How is the CDCA expecting all students, including faculty, to obtain the proper PPE when it is sold out in most places? Having us, the students, modify the way we would normally scale to completion, furthermore, trying to obtain our own PPE, and wait until the end of July, thus delaying our licensing and making it impossible to practice, is unacceptable. This decision to continue to hold this test at all, is affecting when these graduates can join the dental workforce and is contributing to their financial hardship that they are have already been experiencing. It is not just or fair to make these students wait, months after graduating, to take a test to show their competency when the students in this program have been scaling patient’s teeth for 2 years. constantly supervised, checked and graded by faculty. The instructors, faculty, and dean of our program have written and expressed how we have proven our competency to perform the tasks necessary to enter the workforce, giving another reason as to why the clinical exam should be waived for the class of 2020. Students are also still having to take two different computerized exams as well. The entire Medical Education Campus is locked down until fall semester begins at the end of August. To have to open up this facility for one day is not only a waste of time for faculty, instructors, and students, but it is also a waste of valuable resources and materials that should be reserved.

It is also important to mention that the Board of Dentistry has waived the “manikin scaling portion” of the dental exam for dental students. This directly contradicts the Board of Dentistry’s decision to require the exam for dental hygiene students. Other parts of the country have also cancelled this particular portion of the exam. If dental students, and dental hygiene students across the country have been allowed licensure without this form of testing to be done, why would the state of Virginia not do everything in their power to reduce the hardship of the state’s future dental hygienists, and cancel this exam for the year 2020?

Please help these future dental hygienists join the dental workforce faster. We implore you to reconsider the decision to continue having the CDCA/ADEX Patient Treatment Clinical Exam and/or manikin-based exam. If

you know who needs to see this letter to implement this change, please forward it to them. These graduates have worked too hard for too long to have to wait even longer for their dream to come true.

Sincerely,

Dental Hygiene Graduates of 2020  
Northern Virginia Community College



## Sandra Reen

---

**Subject:** FW: Decision to continue to hold ADEX/CDCA Patient exam Dental hygiene Grads 2020

**Importance:** High

----- Forwarded message -----

From: **Janeth** <[janethturcios6@gmail.com](mailto:janethturcios6@gmail.com)>

Date: Tue, May 26, 2020 at 3:55 PM

Subject: Decision to continue to hold ADEX/CDCA Patient exam Dental hygiene Grads 2020

To: <[enfcomplaints@dhp.virginia.gov](mailto:enfcomplaints@dhp.virginia.gov)>

To whom it may concern,

Hello, my name is Janeth Torres Turcios. I am a recent graduate from the accredited Northern Virginia Community College Dental Hygiene program. I currently reside in Alexandria, Virginia and attended the two-year program at the Medical Education Campus located in Springfield, Virginia.

I am writing to you today to inform you on a very urgent and important matter regarding the recent dental hygiene graduates from this learning institute. Due to the unexpected and extraordinary circumstances due to the COVID-19 pandemic, I am writing on behalf of my fellow graduates from Northern Virginia Community College. We are imploring you to overturn the decision to have the college proceed with the 2020 ADEX/CDCA Patient Treatment Clinical Examination, whether it be on a live patient or a manikin.

It is absurd that the Virginia Board of Dentistry is requiring this alternative form of testing, especially during this difficult time. The “manikin” that they would need to create for proper assessment does not even exist yet. It will not be ready until the end of July. Students had planned on graduating in May and getting their dental hygiene license in the summer to begin working. To have to wait until the end of July, and then also wait to get approval for licensure, will further delay the graduates from starting their careers, thus contributing to more economic hardship. The CDCA has created and sent out examination modifications. These modifications involve every student to purchase their own PPE, for this one day, and one-time exam. How is the CDCA expecting all students, including faculty, to obtain the proper PPE when it is sold out in most places? Having us, the students, modify the way we would normally scale to completion, furthermore, trying to obtain our own PPE, and wait until the end of July, thus delaying our licensing and making it impossible to practice, is unacceptable. This decision to continue to hold this test at all, is affecting when these graduates can join the dental workforce and is contributing to their financial hardship that they have already been experiencing. It is not just unfair to make these students wait, months after graduating, to take a test to show their competency when the students in this program have been scaling patient’s teeth for 2 years. constantly supervised, checked and graded by faculty. The instructors, faculty, and dean of our program have written and expressed how we have proven our competency to perform the tasks necessary to enter the workforce, giving another reason as to why the clinical exam should be waived for the class of 2020. Students are also still having to take two different computerized exams as well. The entire Medical Education Campus is locked down until fall semester begins at the end of August. To have to open up this facility for one day is not only a waste of time for faculty, instructors, and students, but it is also a waste of valuable resources and materials that should be reserved.

It is also important to mention that the Board of Dentistry has waived the “manikin scaling portion” of the dental exam for dental students. This directly contradicts the Board of Dentistry’s decision to require the exam for dental hygiene students. Other parts of the country have also cancelled this particular portion of the exam. If dental students, and dental hygiene students across the country have been allowed licensure without this form of testing to be done, why would the state of Virginia not do everything in their power to reduce the hardship of the state’s future dental hygienists, and cancel this exam for the year 2020?

Please help these future dental hygienists join the dental workforce faster. We implore you to reconsider the decision to continue having the CDCA/ADEX Patient Treatment Clinical Exam and/or manikin-based exam. If you know who needs to see this letter to implement this change, please forward it to them. These graduates have worked too hard for too long to have to wait even longer for their dream to come true.

Sincerely,

Dental Hygiene Graduates of 2020

Northern Virginia Community College

Pass rates for Dental Hygiene Live Patient Scaling Clinical Examinations.

| Test & Location                             | Year                        | Percent Passed                   | Notes                    |
|---|-----------------------------|----------------------------------|--------------------------|
| CITA Virginia                               | 2018                        | 93%                              | 87% pass rate nationwide |
| CITA Virginia                               | 2019                        | 93%                              | 85% pass rate nationwide |
| Southern Regional Testing Agency Nationwide | 2018                        | 96%                              | From the website         |
| Southern Regional Testing Agency Nationwide | 2019                        | 100%                             | From the website         |
| ADEX-CITA VCU                               | 2018                        | 95%                              | Below                    |
| ADEX-CITA VCU                               | 2019                        | 100%                             | Below                    |
| CDCA Thomas Nelson CC                       | 2019 (and previous 6 years) | 100%                             | From the TNCC website    |
| ADEX-CITA ODU                               | 2019                        | 97+%                             | From the ODU website     |
| Western Regional Examining Board nationwide | 2019                        | “Near 100%; very low percentage” | From the website         |

As VCU is making this specific waiver request. This is the VCU data for the past 6 years.

**Dental Hygiene B.S.**

To obtain a license to practice dental hygiene from the State Board of Dentistry, a student must fulfill three criteria. These include: 1) a diploma from a Commission on Dental Accreditation (CODA) accredited dental hygiene program, 2) documentation from the Joint Commission on National Dental Examinations (JCND) verifying successful completion of National Board on Dental Hygiene Examination (NBDHE), and 3) documentation from a clinical testing agency verifying successful completion of a clinical examination accepted by the State Board of Dentistry. American Board of Dental Examiners, Inc. administered by the Council of Interstate Testing Agencies (ADEX/CITA) administers the dental hygiene licensure examination most widely accepted among state dental boards, including Virginia. The percentage reported is the first time pass rate of all sections. Passing the clinical dental hygiene board examination (ADEX/CITA) and the (NBDHE) are not required to obtain a degree.

| Year | Threshold (all exams) | First-time pass rate (ADEX-CITA) | First-time pass rate (NBDHE) | Graduation rate | Target (all exams) |
|------|-----------------------|----------------------------------|------------------------------|-----------------|--------------------|
| 2014 | 95%                   | 93%                              | 95%                          | 83%             | 100%               |
| 2015 | 95%                   | 91%                              | 91%                          | 100%            | 100%               |
| 2016 | 95%                   | 100%                             | 91%                          | 95%             | 100%               |
| 2017 | 95%                   | 95%                              | 95%                          | 95%             | 100%               |
| 2018 | 95%                   | 95%                              | 100%                         | 92%             | 100%               |
| 2019 | 95%                   | 100%                             | 100%                         | 100%            |                    |