

H B

228

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CSA



PROPOSED SPONSOR AMENDMENT TO CSSSHB228 (HESS)

"Amend"

Page 1, line 14:

Delete "one member shall be a"

Insert "two members shall be"

Page 1, line 15:

Delete "hygienist licensed under AS 08.32 who has been"

Insert "hygienists licensed under AS 08.32 who have been"

Page 1, line 17:

Delete "two members shall be public members"

Insert "one member shall be a public member"

Page 3. line 7:

Delete "Committee"

Insert "Commission"

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May 9, 1987

### M E M O R A N D U M

TO: Senator Paul Fischer, Chairman, Senate HESS

FROM: Representative Curt Menard *Curt*

RE: An Act Relating to Regulation of the Practice of Dentistry; and Providing for an Effective Date

CSSSHB228 (HESS) is a straight-forward, worthwhile and potentially money-saving piece of legislation.

Basically the purpose of the bill is to allow the Alaska Board of Dental Examiners to join the Western Regional Examining Board (WREB).

The recommendation to allow the Board this opportunity was made by the Division of Legislative Audit in their August 27, 1986 report. It is supported by the Department of Commerce and Economic Development, Division of Occupational Licensing, and by the Alaska Board of Dental Examiners.

The House Health, Education and Social Services Committee passed CSSSHB228 (HESS) out of committee on April 27 with an unanimous "Do Pass." The House Finance Committee passed CSSSHB228 (HESS) out of committee on May 7 with nine "Do Pass" and two "No Rec."

The House passed CSSSHB228 (HESS) unanimously on May 8.

The original version made these changes in existing law: 1) Because participation in the WREB requires 72 days devoted to administering and grading the exam, the number of dentists on the board increased from four to six; 2) Current law required the Alaska Board of Dental Examiners to directly administer the exam, this legislation allows the Board to participate in regional testing through the WREB.

The current version of the bill differs from the original in the following ways: 1) an immediate effective date was added; 2) a retroactive provision was adopted to allow for candidates in the May, 1987 WREB to qualify; and 3) all constricting references to a purely Alaskan test were deleted.

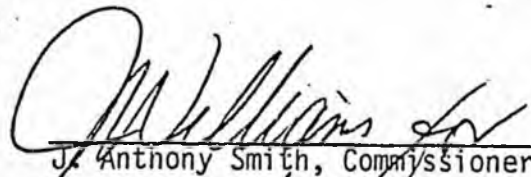
Thank you for your swift consideration of this legislation.

HB 228: An Act relating to the regulation of the practice of dentistry.

In response to legislative intent, the Dental Board has explored the feasibility of Alaska's affiliation with the Western Regional Examining Board (WREB). Two members of the board, a dentist and a dental hygienist, attended a WREB examination in September 1986. In addition, a member of the WREB board came to Alaska to meet with the full Dental Board to explain how the WREB functions. HB 228 amends the current statute regulating dentists to permit participation in WREB.

The department supports the Dental Board's affiliation with the regional testing service. The current Alaska dental exam is difficult and expensive to administer. Twenty-six states utilize regionally administered examinations. WREB conducts six uniform clinical examinations per year at a location selected by WREB. The total cost of testing is the applicant's responsibility. The average cost of the exam is \$400.00 per candidate depending on the total number of candidates taking a given exam. All participating states are required to send Dental Board members to conduct and grade the examination. The current board has only four dental members which would mean each member would be required to spend approximately 18 days per year out of state. Although WREB pays all costs of travel and per diem, the time commitment required would pose a hardship unless the number of dentists on the existing board was increased. Section 1 of the bill increases the number of dentists on the board from four to six, which should alleviate the hardship. The cost of adding the two new members will be offset by WREB assuming the travel and per diem for board members to conduct the exam.

The department believes affiliation with WREB will not only eventually save the state money but dental candidates for licensure will benefit by utilizing an established, impartial dental testing organization.

  
\_\_\_\_\_  
J. Anthony Smith, Commissioner  
DATE: 4/6/87

STATE OF ALASKA 1987 LEGISLATIVE SESSION  
FISCAL NOTE

335

Bill Version: CS SS HB 228 (Hess)  
Publish Date: HOUSE 4/27/87

REQUEST: \_\_\_\_\_

Revision Date: \_\_\_\_\_

Agency Affected: Commerce & Economic Dev.

Title: An Act relating to regulation of the practice of dentistry; and providing for an effective date.  
BRU: Occupational Licensing

Sponsor: Reps. Menard, Gruenberg & Boucher Components: \_\_\_\_\_

Requestor: \_\_\_\_\_

EXPENDITURES/REVENUES: (Thousands of Dollars)

OPERATING	FY 87	FY 88	FY 89	FY 90	FY 91	FY 92
PERSONAL SERVICES	0	0	0	0	0	0
TRAVEL	0	4.3	4.3	4.3	4.3	4.3
CONTRACTUAL	0	0	0	0	0	0
SUPPLIES	0	0	0	0	0	0
EQUIPMENT	0	0	0	0	0	0
LAND & STRUCTURES	0	0	0	0	0	0
GRANTS, CLAIMS	0	0	0	0	0	0
MISCELLANEOUS	0	0	0	0	0	0
TOTAL OPERATING	0	4.3	4.3	4.3	4.3	4.3

CAPITAL	0	0	0	0	0	0
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REVENUE	0	0	0	0	0	0
---------	---	---	---	---	---	---

FUNDING: (Thousands of Dollars)

GENERAL FUND	0	0	0	0	0	0
FEDERAL FUNDS	0	0	0	0	0	0
OTHER	0	4.3	4.3	4.3	4.3	4.3
TOTAL	0	4.3	4.3	4.3	4.3	4.3

POSITIONS:

FULL-TIME	0	0	0	0	0	0
PART-TIME	0	0	0	0	0	0
TEMPORARY	0	0	0	0	0	0

ANALYSIS : (Attach a separate page if necessary)

(See Attached)

Prepared by: Jennifer Strickler, Management Analyst

Phone: 465-2144

Division: Occupational Licensing

Date: 4/15/87

Approved by Commissioner: L. Anthony Smith

Date: \_\_\_\_\_

Agency: Commerce and Economic Development

Distribution (by preparer):

- Legislative Finance
- Legislative Sponsor
- Requestor
- Office of Management and Budget
- Impacted Agency(ies)
- Senate Secretary

FISCAL NOTE

The bill broadens the dental examination statutes to allow the board to utilize a regional board examination. Because of the time commitment required of board members in using the regional exam, it was necessary to increase the number of members to alleviate the burden associated with administering the exam.

The regional board exam agency will assume costs associated with transporting members to assist with the exam. However, increasing the size of the board will also require funding for the new members to attend board meetings. Therefore, the \$4,300.00 provides funding for the two new members to travel to the four dental board meetings required by statute, assuming one member is appointed from Southeast and the other appointed from the Northern region of the State. This cost is also expected to be covered through program receipts.

335

STATE OF ALASKA 1987 LEGISLATIVE SESSION  
FISCAL NOTE

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EXPENDITURES/REVENUES: (Thousands of Dollars)

OPERATING	FY 87	FY 88	FY 89	FY 90	FY 91	FY 92
PERSONAL SERVICES	0	0	0	0	0	0
TRAVEL	0	4.3	4.3	4.3	4.3	4.3
CONTRACTUAL	0	0	0	0	0	0
SUPPLIES	0	0	0	0	0	0
EQUIPMENT	0	0	0	0	0	0
LAND & STRUCTURES	0	0	0	0	0	0
GRANTS, CLAIMS	0	0	0	0	0	0
MISCELLANEOUS	0	0	0	0	0	0
TOTAL OPERATING	0	4.3	4.3	4.3	4.3	4.3

CAPITAL	0	0	0	0	0	0
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REVENUE	0	0	0	0	0	0
---------	---	---	---	---	---	---

FUNDING: (Thousands of Dollars)

GENERAL FUND	0	0	0	0	0	0
FEDERAL FUNDS	0	0	0	0	0	0
OTHER	0	4.3	4.3	4.3	4.3	4.3
TOTAL	0	4.3	4.3	4.3	4.3	4.3

POSITIONS:

FULL-TIME	0	0	0	0	0	0
PART-TIME	0	0	0	0	0	0
TEMPORARY	0	0	0	0	0	0

ANALYSIS : (Attach a separate page if necessary)

(See Attached)

Prepared by: Jennifer Strickler, Management Analyst

Phone: 465-2144

Division: Occupational Licensing

Date: 4/15/87

Approved by Commissioner: J. Anthony Smith

Date: \_\_\_\_\_

Agency: Commerce and Economic Development

Distribution (by preparer):

- Legislative Finance
- Legislative Sponsor
- Requestor
- Office of Management and Budget
- Impacted Agency(ies)
- Senate Secretary

All members, The Alaska Legislature  
Juneau, Alaska

April 1, 1987

To all members, The Alaska Legislature:

I am writing all of you as in an effort to emphasize the importance and significance of speedy passage of the House Bill entitled " An Act relating to the regulation of the practice of dentistry."

I am presently a fourth year dental student at the University of Washington. I am writing as a spokesperson for the applicants that are planning on becoming practicing dentists in 1987 in the State of Alaska.

The dental licensing examination is a requirement all applicants must successfully pass before they may begin dental practice in each respective state. It is very costly to the State to put on such an Exam for the small number of applicants to Alaska . This fact, coupled with recent budget cuts , has led to a recent vote by the State of Alaska Board of Dental Examiners to join a testing service called the Western Regional Examining Board (WREB). This is the same service that is used for Dental Licensing Exams for the States of Montana, Idaho, Utah, and Arizona. The Exams are given at least 4 times per year and they are usually held in California, Arizona or Oregon.

The current Law in Alaska, Sec. 08.36.130 of the Dentistry Act states: "an examination shall be given at least once a year and at times and at places determined by the board to be convenient and economical for the applicants and the state." At present, the Alaska Dental Board cannot tell applicants for certain if or when the next Exam will be. They suggest there may be one "sometime in August" but are not sure. **They are waiting for the results of *this* Legislation.** We, as applicants, are left in the uncomfortable position of total uncertainty.

The law states the exam must be "...convenient and economical for the applicants and the state." At present it is neither convenient nor economical for anyone. Since Alaska does not have its own Dental School, all applicants must be trained out of the state. The applicants must fly or drive to Alaska from all parts of the country to take the Exam. This is costly and inconvenient for the applicants. The State has already determined that it is in the states best interest to join the WREB. This is cost effective for the state.

One question that remains is *when* will the acceptance of scores from the WREB take place to allow licensure for the practice of dentistry in Alaska. A decision to except results from this Exam effective immediately will solve both problems at once. The State of Alaska would not need to stage another costly licensing Exam and the dental applicants would have a variety of testing sites and dates to choose from that are either at or near their respective dental schools.

The Western Regional Exam is offered next in Portland, Oregon on May 23-25th, 1987. Spaces available for applicants to this Exam are filling up. If this Legislation is passed and is effective immediately, applicants can take the WREB Exam in May and begin practicing dentistry in Alaska in June. If this is not passed in time, it is conceivable an applicant could take the WREB Exam in May, pass the exam, but not be licensed for practice in Alaska. These applicants would then have to retake the same exact Exam at some unspecified later date. In addition, if an applicant is to wait for an Exam that may be given in Alaska in mid-August, they would sit idle from graduation in June until late August (when the test results are published). This would be a very inconvenient use of over two months of time for the applicant.

I hope this helps to clarify the importance of this Bill as it relates to the State and the impact it has upon new dentists in the State of Alaska. I urge you all to please help all parties involved by working toward a speedy passage of this Bill. I believe it is in everyone's best interest.

-3-

Thank you very much for your prompt attention to this matter. I look forward to returning to our beautiful State.

Sincerely,

Kirk JOHNSON

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Dental School

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A SPECIAL REPORT ON THE  
DEPARTMENT OF COMMERCE AND ECONOMIC DEVELOPMENT  
BOARD OF DENTAL EXAMINERS

August 27, 1986

Audit Control Number

08-4271-86-S

APR 28 1986

Commissioner, Department of  
Commerce and Economic Development

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# STATE OF ALASKA

AUDIT DIVISION  
POUCH W  
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**THE LEGISLATURE**  
BUDGET AND AUDIT COMMITTEE

August 27, 1986

Members of the Legislative Budget  
and Audit Committee:

In accordance with a Legislative Budget and Audit Committee special request and the provisions of Title 24 of the Alaska Statutes, the attached report is submitted for your review.

A SPECIAL REPORT ON THE  
DEPARTMENT OF COMMERCE AND ECONOMIC DEVELOPMENT  
BOARD OF DENTAL EXAMINERS

August 27, 1986

Audit Control Number

08-4271-86-S



Gerald L. Wilkerson, CPA  
Legislative Auditor  
Division of Legislative Audit

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## PURPOSE OF THE REPORT

In accordance with a Legislative Budget and Audit Committee request and the provisions of Title 24 of the Alaska Statutes, this special report has been prepared to evaluate the Alaska Board of Dental Examiners' licensing and examination practices.

We were requested to review the Board's examination practices to determine whether they are setting standards which are artificially high in order to limit competition. In addition, we performed a follow-up review of actions taken by the Board in response to House and Senate Letters of Intent adopted in conjunction with the passage of CSHB 614 (HESS) (title am), an act extending the termination date of the Board of Dental Examiners, during the second session of the 14th Alaska State Legislature.

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## ORGANIZATION AND FUNCTION

The Alaska Board of Dental Examiners was created in 1955. The Board consists of seven members; four licensed dentists, one dental hygienist, and two public members which are appointed by the Governor subject to confirmation of the Legislature. Board members serve terms of four years.

The Board is organized under the Department of Commerce and Economic Development, Division of Occupational Licensing. Administrative functions of the Board are provided by Occupational Licensing, such as processing applications, maintaining licensing files, answering inquiries, and providing investigative support.

The primary function of the Board is to ensure a minimum quality of dental care to Alaskans by licensing qualified applicants and establishing regulations necessary to enforce statutes. The Board regulates dentists, dental specialists, and dental hygienists who perform services in the State. Special permits are issued by the Board to Federal agencies that supply dentistry to residents of isolated areas remote from major population centers.

The responsibility and authority for evaluating the competence of candidates for dental licensure are vested in the Board. A clinical and written examination has been developed by the Board to assess a candidate's competency. The clinical examination is a two day practical examination, requiring candidates to complete an amalgam and a gold inlay restoration procedure. Dental hygienists are also required to take a clinical and written examination. Although dental specialists are not required to take an examination, they must be licensed dentists in Alaska and may be required to have completed additional years of education in their specialty area.

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## REPORT CONCLUSIONS

### AUDITOR COMMENTS/CONCLUSIONS

The Alaska Board of Dental Examiners has historically been the subject of much criticism. Criticism has been prompted by high failure rates experienced on past dental examinations and by the Board's decision not to provide a means for dental licensure by credentials as allowed by Alaska law. Though it is an inherent nature of all licensing boards to restrict entry into regulated professions to only those applicants possessing satisfactory qualifications, it has been suggested that the Alaska Board of Dental Examiners may be overly restricting entry into the dental profession in Alaska through adherence to licensing standards which are artificially high in order to limit competition. In our review of the Board's examination and licensing practices and procedures we did not find evidence which supports this contention. We did find, however, that entry into the dental profession in Alaska has been effectively limited due, in part, to the Board's failure to provide a means for dental licensure by credentials and, in part, to the commonness of high failure rates on past dental examinations.

We have included recommendations in this report which, if implemented, would serve to minimize the natural tendency to restrict entry into the dental profession in Alaska by allowing easier access to dental licensure in the State, while at the same time continuing to ensure adequate protection to the public by only allowing licensure to those dentists who are qualified and competent to practice dentistry. Our recommendations are included in the findings and recommendations section of this audit report.

### REGULATION OF THE DENTAL PROFESSION

All fifty states plus Puerto Rico, the Virgin Islands, and the District of Columbia, regulate dentists through licensure. Regulation through licensure of qualified dentists is necessary to protect the public's health, safety, and welfare. Though specific requirements for licensure vary between jurisdictions, two common elements involve the need to ensure that all candidates for initial licensure possess satisfactory theoretical knowledge and can demonstrate satisfactory clinical skills. Theoretical knowledge is measured by the use of written examinations while clinical skills are assessed through the use of practical, or clinical, examinations requiring procedures to be performed on patients. Successful completion of both written and clinical examinations, in some form, is required prior to initial licensure in all jurisdictions. (See Appendix B and Appendix C.)

## ALASKA DENTAL EXAMINATION

### Subject Matter and Administration

Like elsewhere, the Alaska dental examination consists of both a written and clinical examination. Topics covered on the written portion of the Alaska dental exam include oral diagnosis, oral medicine, radiology, prosthetics, and Alaska statutes and regulations governing the practice of dentistry. The clinical portion of the examination requires candidates to complete amalgam and gold inlay preparations and restorations on actual patients. (Until the most recent exam, a gold foil preparation and restoration was also a clinical requirement). The subject matter of both portions of the Alaska dental examination, as well as the overall administration of the exam, are commensurate with similar examinations administered by other states and by regional dental testing boards or agencies. (See Appendix A.)

### Test Results

The failure rate on the Alaska dental examination has historically been higher than that experienced on similar exams administered elsewhere. For example, in 1981 Alaska failed 48.1% of all dental candidates, compared to a 15.5% failure rate for the nation taken as a whole. (See Appendix F.) Alaska dental exam failure rates on the five examinations given between November 1983 and November 1985 oscillated from 33.3% to 88.9%, with an average failure rate of approximately 59.3%. (See Appendix G.)

The Alaska Board of Dental Examiners is aware of public concern related to high failure rates on the Alaska dental examination. The Board has been reviewing, for some time, their exam scoring procedures in an attempt to identify areas where improvements could be made. As a result of this review, and in response to House and Senate Letters of Intent adopted during the most recent legislative session, the Board took action at their June 1986 Board meeting to restructure the content of the examination and to revise the scoring procedures used in conjunction with the grading of the clinical portions of the same. The Board eliminated the gold foil subject of the clinical examination and adopted a new "criterion based" scoring system recommended by a consultant hired to calibrate examiners for the August 1986 dental exam. The Board also resolved to provide for examiner calibration on at least an annual basis in order to promote consistency between examiners.

The restructured examination and newly adopted scoring procedures were utilized for the most recent Alaska dental exam which was conducted on August 15-17, 1986. The pass rate associated with this particular examination was 75%, the highest experienced on any Alaska dental exam in the last 9 years. Though it is premature to conclude that the Alaska dental examination and associated scoring procedures are no longer in need of any revision, a pass rate of 75% does indicate that positive steps have been taken. Alaska's pass rate on the August 1986 dental exam compares more favorably with pass rates on dental exams administered by other western states and by various regional dental testing boards or agencies. (See Appendix H.)

### LEGISLATIVE INTENT

Both bodies of the Alaska State Legislature adopted Letters of Intent during the most recent legislative session in conjunction with the passage of CSHB 614 (HESS) (title am), an act extending the termination date of the Board of Dental Examiners. The two Letters of Intent are the result of legislative concerns formulated during Sunset hearings conducted by the House and Senate committees on health, education, and social services (HESS) while contemplating the continuation of the Board. Legislative intent and actions taken to date by the Alaska Board of Dental Examiners in response to that intent is summarized below.

#### A. House HESS Committee Intent

##### 1. Complete continued competency regulations.

Board action to date: The Board has been working towards adoption of regulations along this line for quite some time. Proposed regulations requiring proof of continuing education at license renewal dates for both dentists and dental hygienists were reviewed at the Board's June 13-14, 1986 Board meeting and subsequently adopted by the Board at their August 16, 1986 meeting. The Board appears to have complied with the intent of the Legislature related to this issue.

##### 2. Develop new procedures for credentialling including credentialling for dental specialties.

Board action to date: The Alaska Board of Dental Examiners heard testimony at their June 13-14, 1986 meeting, and again at their August 16, 1986 meeting, regarding the credentialling of dental specialists and the theoretical ramifications of licensure by credentials in general. Beyond this, the Board has

taken little action which appears to be moving Alaska closer to reinstating licensure by credentials, as allowed by AS 08.36.234, or to providing licensure by credentials for dental specialists.

The current Board's position, though not the position of all members, was reiterated by the Board's President for the benefit of those present at the June 13-14, 1986 Board meeting. He noted that the Alaska Board of Dental Examiners would not accept administrative credentialling and was opposed to any form of credentialling without at least an oral examination. (Current law does not provide for an oral examination, only a personal interview.) The Board has not taken steps to either repeal the emergency regulation by which licensure by credentials was ceased, or to develop new procedures for credentialling including credentialling for dental specialties.

3. Restructure the examination, including elimination of the gold foil portion of the test, and scoring procedures, including calibration of scoring techniques.

Board action to date: The gold foil portion of the clinical examination was eliminated, and a new "criterion based" scoring system adopted by the Alaska Board of Dental Examiners prior to the administration of the August 15-17, 1986 Alaska dental examination. In addition to actions taken to effect the above, the Board also resolved at their June 13-14, 1986 meeting to provide for examiner calibration on at least an annual basis, preferably prior to each exam. Actions taken by the Board in restructuring the examination and its scoring procedures have been in compliance with the intent of the Legislature.

4. Evaluate the possibility of joining the Northwest Regional Examining Board.

Board action to date: At their June 13-14, 1986 meeting the Board of Dental Examiners formed a committee, in response to legislative intent, to look into the possibility of Alaska's affiliation with the Western Regional Examining Board (WREB). ("Northwest" is a misnomer in the House Letter of Intent). The committee reported to the Board at the August 16, 1986 Board meeting that as a result of their inquiries the WREB had extended an invitation to the Alaska Board for one member to attend and observe their September 28-30, 1986 dental exam at the WREB's expense. The Board opted to accept the invitation and, in addition,

resolved to seek funding to cover the expense of sending the dental hygienist member of the Alaska Board to a WREB dental hygienist exam. The purpose of this trip would be to evaluate the possibility of Alaska's affiliation with the WREB for testing Alaska's dental hygienist candidates.

As evidenced by the above, the Alaska Board of Dental Examiners is in the midst of evaluating the possibility of joining the Western Regional Examining Board. The evaluation is being conducted in order to adhere to the intent of the Legislature.

B. Senate HESS Committee Intent

1. Exercise statutory authority under AS 08.36.234 to license dentists by credentials, including credentialing for dental specialties. (The intent of the Senate HESS Committee mirrors that of the House HESS Committee on this issue, but in addition, urges the Alaska Board to repeal the existing regulation under which the Board ceased licensing by credentials.)

Board action date: See actions taken per item A.2. above.

In addition to these specific items, the Letters of Intent adopted by both the House and the Senate called for reports to be submitted to the Legislature by the first day of the first session of the 15th Alaska State Legislature. It is expected at this time that the Alaska Board of Dental Examiners will comply with these requests.

(Intentionally left blank)

## FINDINGS AND RECOMMENDATIONS

### Recommendation No. 1

The Alaska Board of Dental Examiners should issue dental licenses to qualified dentists based on their performance records in lieu of requiring they pass an examination. (Licensure by credentials).

Alaska Statute 08.36.234 established provisions by which Alaska dental licenses could be issued to dentists already licensed in another state, territory, or region without requiring that they pass the Alaska dental examination if certain specific provisions were met. Issuing a license using a performance record in place of an examination is termed licensure by credentials.

The American Dental Association (ADA) believes, as noted in their stated policy on guidelines for licensure, that an evaluation of a practicing dentist's theoretical knowledge and clinical skill based on his/her performance record can provide as much protection to the public as would an evaluation based on examination. The ADA also believes that requiring a candidate who is seeking licensure in several jurisdictions to demonstrate his/her theoretical knowledge and clinical skill on separate examinations for each jurisdiction seems unnecessary duplication. Twenty states, including the District of Columbia, currently provide for some means of dental licensure by credentials, as did Alaska prior to October 17, 1984. (See Appendix D.)

The Alaska Board of Dental Examiners allowed for the issuance of dental licenses based on candidate's credentials during the period June 1, 1980 to October 17, 1984. (Eight of 83 dental licenses issued during that time were based on credentials - See Appendix E.) The Board adopted, by emergency order, a regulation effective October 17, 1984, which resulted in the cessation of licensure by credentials (12 AAC 28.950). This action was prompted by problems with the procedures followed by the Board when conducting personal interviews of candidates as required by AS 08.36.234(7). These problems were originally addressed by both the Ombudsman's office and the office of the Attorney General.

In January of 1983, the Ombudsman's office found fault with the credential licensing process used by the Board while investigating a complaint that the process was unfair and arbitrary. The Attorney General's office subsequently determined that the Alaska Board of Dental Examiners was, in effect, conducting an "oral examination" in lieu of an "interview," by requiring case studies be presented during the interview process. This, they said, was not proper

since there were no regulations which gave notice to applicants that the "interview" would be conducted as an examination, and that the requirement of a "personal interview" could not, by any stretch of law or logic, be construed as implementing an examination requirement in the absence of such regulations. The Attorney General's position prompted the "reinterview" and licensure of 14 candidates previously denied licensure by credentials, bringing to 22 the total number of Alaska dental licenses issued in this manner. (This amounts to approximately 17% of all dental licenses issued since June 1, 1980 - See Appendix E.)

Contrary to the belief of the American Dental Association, the majority of the members of the Alaska Board of Dental Examiners do not believe that a licensed dentist's clinical skill can be adequately assessed without examination. Due to this belief, the Board has not taken steps to rescind the regulation that stopped licensure by credentials. In addition, they have not developed policies or procedures, drafted regulations, or introduced legislation which, if adopted, would allow Alaska to return to licensing dentists based on credentials in a manner acceptable to the Board.

Licensure by credentials is a viable alternative to licensure by examination for candidates already licensed in another jurisdiction. The failure on the part of the Alaska Board of Dental Examiners to provide a means for dental licensure by credentials, as allowed by Alaska Statute, effectively limits entry into the dental profession in the State. It is not in the best interest of the citizens of our State to overly restrict entry into any regulated profession in Alaska. We, therefore, recommend that the Alaska Board of Dental Examiners take whatever steps are necessary, including the repeal of section 12 AAC 28.950 of the Alaska Administrative Code and adoption of clarifying regulations specifying the procedures to be adhered to during the interview process, in order to reinstitute dental licensure by credentials for those dentists already licensed in another state, territory, or region.

#### Recommendation No. 2

The Alaska Board of Dental Examiners should affiliate with one or more of the four existing regional testing services for the examination of dental candidate's clinical skills in lieu of administering a State-run clinical examination.

The current Alaska dental examination is administered by the Alaska Board of Dental Examiners twice annually and consists of both a written and clinical examination. The written examination is designed primarily to test a candidate's theoretical knowledge of basic biomedical and dental sciences while the clinical examination is used to determine whether the candidate possesses satisfactory clinical skill.

An applicant must receive a score of at least 75% on each subject of both examinations to receive an overall passing grade and hence be eligible for licensure.

Written examinations are of the objective type, with responses to test questions being recorded on answer sheets which are graded with the aid of an answer key or template. Alaska utilizes excerpts from the written examination administered by the Northeast Regional Board of Dental Examiners for the written portions of Alaska's exam covering oral diagnosis, oral medicine, and radiology. The portions of the written examination covering prosthetics, and Alaska Statutes and regulations governing the practice of dentistry, have been developed by the Alaska Board of Dental Examiners.

Unlike the written examination, the grading of the clinical exam is subjective in nature. The clinical portion of the examination requires candidates to complete amalgam and gold inlay preparations and restorations on actual patients in a clinical setting. (Until the most recent exam, a gold foil preparation and restoration was also a requirement.) Candidates are graded at various steps during the completion of each clinical procedure by several examiners appointed by the Alaska Board of Dental Examiners. In all cases, examiners must be practicing dentists licensed in the State. More often than not, they are members of the Alaska Board. Grades are assigned by examiners based on their perception of whether a candidate's work meets certain sets of established criteria designed to measure clinical ability. An average of the scores assessed by each examiner determines the candidate's final grade on each operative subject.

At a recent examiner calibration session, held in preparation for the August 1986 dental exam, the Alaska Board of Dental Examiners concurred with a statement made by an expert on the subject of dental examinations and scoring techniques to the effect that all dental examinations are virtually the same in both content and administration, and that the differences in pass/fail rates between jurisdictions revolves solely around the scoring and grading of the individual examination itself. (See Appendix A for examination structure and general information on various regional and State dental exams.) At the same meeting, the Alaska Board was informed of a national trend showing dental exam failure rates moving towards a range of between 30% to 35%, with slightly higher failure rates noted in the western states than in the east. As shown below, Alaska's pass/fail rates have not paralleled this national trend, the primary cause for this being dental candidate's inability to attain passing scores on the clinical (subjective) portion of the Alaska dental examination.

The overall failure rate on the five Alaska dental examinations administered between November 1983 and November 1985 oscillated from 33.3% to 88.9%, with an average failure rate approximating 59.3%. The failure rate on the written portion of the examination for the same period was only 1.8%, with only one failure in 55 initial attempts. The overall pass rate on the most recent Alaska dental exam, administered in August 1986, was 75%, with 10 of 11 candidates passing the written portion. (See Appendix G.) An overall pass rate of 75% indicates that recent changes in Alaska's examination content and scoring procedures may have had a positive effect on the outcome of this exam; however, it is premature to conclude that this is more than an isolated incident and in fact evidences a change in previously established trends. (75% is the highest pass rate experienced on the Alaska dental examination since 1977.)

Clinical examination failure rates, and in turn overall dental exam failure rates, of the magnitude of those experienced prior to August 1986, are excessive not only in comparison to the above noted national trend, but also in comparison to failure rates on similar examinations administered by other western states and various regional dental testing boards or agencies. The State of Washington's dental exam failure rate over the last five years has been in the range of 35% to 37% for in-state dental school graduates and approximately 50% for out-of-state graduates. Oregon's failure rate is commonly in the range of 10% to 20%. On Oregon's most recent examination, 90% of all candidates examined received passing scores. California's 1984 failure rate was 48%, compared to 45% in 1983. (See Appendix H.)

As shown in Appendix C, regionally administered clinical examinations are utilized by 26 states in place of State administered clinical exams. An additional 6 states, including the District of Columbia, utilize regional clinical exams in conjunction with a State performance examination, while one state administers their own clinical exam only for candidates from non-accredited schools. 1985 failure rates on regional clinical examinations administered by the Northeast Regional Board of Dental Examiners (NERB) and the Central Regional Dental Testing Service (CRDTS) were 19.8% and 10.8%, respectively. The average failure rate on the examination administered by the Western Regional Examining Board (WREB) for the last 5 years has been 23.2%, with a high of 33% and a low of 19%. (See Appendix H.)

A factor known to have partially contributed to candidate failure on Alaska's clinical examination is the lack of consistent assessment of scores by dental examiners. One case was noted where a candidate's scores assigned by four

different examiners on the same step of an operative procedure ranged from 0% to 80%, with actual scores being 0, 60, 80, and 0. Though this is an extreme example, the existence of this type of situation indicates a dire need for modification in the evaluation process.

Regardless of the exact causes for Alaska's high failure rates on past dental examinations, changes must be made which will serve to foster the public's faith in the State's means for regulating entry into the dental profession. Procedures must be adhered to which will allow the clinical portion of the Alaska dental examination to be conducted in an objective manner, with the emphasis on passing all candidates who evidence satisfactory knowledge of the basic principles of operative dentistry and possess satisfactory clinical skill - even those who possess only the "minimum" qualifications. Pass rates on the Alaska dental examination should be commensurate with those being experienced on dental examinations administered elsewhere in the nation.

In order to accomplish the above, the Alaska Board of Dental Examiners should affiliate with one or more of the four existing regional dental testing services for the testing of candidates clinical ability. Another alternative would be to merely accept for licensure any candidate who has successfully completed any of the four regional boards. The first approach would allow Alaska the opportunity for input into the development of the clinical examination, while the second would require us to rely on the ability of states affiliated with the regional organizations to maintain an examination which tests procedures and methods commensurate with current trends in dental education and acceptable dental practices. In either case, the Alaska Board of Dental Examiners will benefit from disassociating themselves from the onus of administering the subjective clinical examination by placing this burden on an established, impartial, dental testing organization located outside of the State. The public will, in turn, benefit through the Board's ability to focus their efforts on other pertinent issues related to the dental profession in the State of Alaska.

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APPENDIXES

Source for Appendixes A - D: American Dental Association 1986 publication, titled, "Facts About States - For the dentist seeking a location."

Source for Appendix F: American Dental Association 1982 publication, titled, "Facts About States - For the dentist seeking a location."

APPENDIX A

## State and Regional Boards: Structure of Exams and General Information\*

The following chart outlines the structure of the board exams for each state and region. Among the new developments in 1985: Idaho has joined the Western Regional Examining Board.

The supporting papers needed to take the boards are generally the same in every state: recent photographs, copies of your national board scores, a certificate of graduation, fingerprints, copies of your dental school transcripts (and sometimes undergraduate transcripts), proof of liability insurance coverage, and other dentists' verification of your high moral character. Not every state requires all of these, but it pays to collect them all, especially if you're planning to take exams in several states.

Nearly every state requires you to supply your own patients and the proper indications for the procedures you'll perform. Most states also expect you to provide your own handpieces, instruments, and supplies. Several states supply some of these for a nominal fee, and in other states, dental supply firms attend the board exams and have limited supplies on hand for your use. In any case, you should go to the exam with everything you think you may need.

Most states do not accept reciprocity from other states, but many do allow licensure by credentials: that is, they will grant a license to practice if you have already passed a board exam in another state and have worked there for a certain number of years.

Thirty-two states belong to regional testing systems. The regional boards do only the clinical testing phase for the different states.

Regional Testing Service/State Board	Exam Frequency	Fee	Written	Practical	Additional Information
Northeast <sup>1</sup>	Winter, spring, summer	\$275	Simulated clinical examinations; (1) diagnosis, oral medicine, and radiology; (2) comprehensive treatment planning	Class V gold foil or class II amalgam; class II, III, IV gold foil or class II inlay, ¾ or full crown; diagnosis and scaling of periodontal patient; complete denture exercise with patient (impression of either arch to esthetic try-in of maxillary denture)	Candidates are permitted to take the NERB examination only once during a cycle.
Southern <sup>2</sup>	May/June, July/August, December	\$300	Treatment planning, oral pathology	Class II amalgam; MOD inlay/onlay; class III or IV composite, denture exercise on patient (impressions upper and lower, to esthetic try-in)	Candidates must submit proof of malpractice insurance with their applications.
Central <sup>3</sup>	May, June, August, December	\$350	Prosthodontics, periodontics, emergency/basic life support	Periodontal clinical; Class II amalgam; cast restoration, an inlay, onlay, ¾ crown, or ½ crown; composite restoration; simulated clinical judgment	Applications must be received 45 days before examination date. Nebraska allows reciprocity from other states. Must furnish own patients.
Western <sup>4</sup>	March, June, September	\$375	Oral pathology, prosthetics	Class II amalgam, periodontics, gold casting (onlay to full crown, no inlay), endodontics	Must furnish own patient, instruments, and handpieces. Expendable materials (except gold) are supplied.
Alabama	June (may vary)	\$120	Theoretical exam on Alabama jurisprudence and radiation safety	Prosthetics, endodontics, prophylaxis, operative	Must furnish own patients. Must furnish own instruments, and supplies. No reciprocity with other states.
Alaska	June, November	\$200	Oral diagnosis and treatment planning, jurisprudence, prosthetics	Class II amalgam, class V gold foil, class II gold inlay <sup>3)</sup>	Must furnish own patients, handpieces, instruments, and supplies. No reciprocity with other states. No licensure by credentials.
California	6 times a year	\$150	Oral diagnosis and treatment planning, written perio. Radiation safety (optional).	Class II amalgam. Periodontal exam includes written diagnostic and clinical. Crown and bridge prepare two abutments; construct wax pattern on one. Full denture set-up.	

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Regional Testing Service/State Board	Exam Frequency	Fee	Written	Practical	Additional Information
Florida	June, December	\$280	Laws and rules of Florida	On mannequin: cast gold class II MOD onlay on bicuspid tooth; class II amalgam; pin amalgam endodontic access on posterior and anterior tooth. On patient; periodontal exercise, prosthetic impression and articulation.	Must furnish own patients (Supply companies will usually help.) About 52% pass annually. Must have taken national board within 10 years. No reciprocity with other states.
Georgia	June.	\$200	Jurisprudence, periodontics and oral pathology slide exam (multiple choice)	Clinical class II amalgam, class III composite, cast gold class II inlay or onlay; laboratory; preparations and gold casting on dentiform, denture set-up.	Must furnish own patients, instruments, and handpieces. No reciprocity with other states.
Hawaii	twice a year; announced 60 days before exam	\$250	Jurisprudence, oral diagnosis, treatment planning	Class III or II gold foil; class II amalgam; MOD onlay and 1/2 crown with 1 indirect wax-up, complete denture set	Must furnish own patients, but Hawaii does run ad in local college newspapers. Must furnish own handpieces, instruments, and supplies. No reciprocity with other states.
Indiana	twice a year	\$100	Theoretical exam if all parts of national boards have not been completed; jurisprudence on Indiana laws.	Class II amalgam; class II, III, IV foil, or class I, V gold foil and composite, or MOD inlay or crown; prosthetic problem solving; Lab: anterior porcelain bonded to metal preparation; 1/4 crown prep on bicuspid, wax, cast and finish; upper denture set-up; periodontal scaling and curettage; diagnosis and treatment planning.	Must have valid CPR certification before exam. Must furnish own patient. Must obtain malpractice insurance before the exam. Must furnish original dental school diploma.
Louisiana	May/June (annually)	\$100	Ethics and jurisprudence, office emergencies, oral surgery, periodontics, oral pathology	Amalgam and composite, onlay procedure, removable prosthodontics, endodontics, occlusion	Must furnish own patients, liability insurance, equipment, and supplies. Content of examination is subject to change at the discretion of the board.
Mississippi	June (annually)	\$200	Jurisprudence, dental anatomy, radiography	One MOD, DO, or MO amalgam; one four-surface amalgam replacing at least one cusp; one class III composite; one full gold crown; removable prosthetics	No reciprocity. All information subject to change for each examination. Must have valid CPR. Must furnish own patients.
Nevada	March, July (annually)	\$200	Must have passed national board examination.	Complete denture fabrication; either a class II, III, or IV gold foil or a class II cast gold restoration, inlay, or onlay (restoration must be finished in one day); class II amalgam	Must furnish own patients, instruments, and supplies, including pre- and postoperative radiographs. Some disposable items will be available. No reciprocity.
New Mexico	January, June	\$150	Jurisprudence, oral diagnosis, office emergencies	Class II amalgam; gold casting; MOD inlay; class III, IV or V gold foil	Must furnish own patients, instruments and high low speed handpiece. Supply company assists with exam. No reciprocity. No licensure by credentials.
New York <sup>3,6</sup>	August, December	\$245	Equivalent to Northeast Regional Board	Equivalent to Northeast Regional Board	Equivalent to Northeast Regional Board but valid only in New York. Open to eligible graduates of non-accredited and accredited schools. Must furnish own patients and instruments.

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Regional Testing Service/State Board	Exam Frequency	Fee	Written	Practical	Additional Information
North Carolina	May, August	\$75	Jurisprudence, periodontics, occlusion	Class II inlay or onlay; class II amalgam; oral surgery; removable prosthodontics (complete upper denture, partial design); periodontics; lab exercises; endodontics, crown preps	Must furnish own patients and instruments. No reciprocity. No licensure by credentials. No specialty exams.
Oklahoma	May, June, and December	\$200	Jurisprudence	Prosthetic denture set-up; clinical operative procedures	Must furnish own patients and instruments. Must have valid CPR.
Oregon	June, Decemoer	\$50	Jurisprudence, oral diagnosis, treatment planning, oral pathology, and general dentistry	Selection from the following: amalgam restoration, cast gold restoration, periodontics, prosthodontics	No reciprocity or temporary licenses. Must furnish own patients and instruments. Specialty exams available.
South Carolina	Summer	\$200	Ethics and Jurisprudence	Clinical includes 2 class II amalgams, 2 composites; prosthetics: impressions, CR records, set mandibular and maxillary 6 inferior teeth. Laboratory: Wax up 3-unit bridge, prep onlay, wax and cast on a dentiform.	
Texas	May/June, August/September	\$100	Jurisprudence	3-unit fixed bridge; 2 class II amalgams; 2 composite restorations; prepare diagnosis and treatment plan from photographs, x-rays, models, etc.; denture set-up, ready for flasking	Must furnish own patients. No reciprocity or temporary licenses.
Virgin Islands	June, November	\$65	Operative dentistry, pharmacology, prosthodontics, oral surgery and pain control, oral pathology and radiology, endodontics-periodontics, anatomic sciences, and dental anatomy from the national board exams if have not passed the national boards during the last two years.	Periodontics, radiology, oral surgery, operative dentistry	
Washington	June, September	\$120		Class II amalgam; class II, III, V gold foil; MOD inlay and a periodontal section	Must furnish own: patients, instruments, handpieces, and supplies. Some companies may have supplies for use at no cost. No reciprocity with other states.

NOTES: <sup>1</sup> Includes Connecticut, District of Columbia, Maine, Maryland, Massachusetts, Michigan, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, and West Virginia.

<sup>2</sup> Includes Arkansas, Kentucky, Tennessee, and Virginia.

<sup>3</sup> Includes Colorado, Iowa, Minnesota, Missouri, Kansas, Nebraska, North Dakota, South Dakota, Wisconsin, and Wyoming.

<sup>4</sup> Includes Arizona, Idaho, Montana, and Utah.

<sup>5</sup> In addition to participating in the Northeast Regional Board, New York administers a separate series of examinations.

<sup>6</sup> The fee shown for New York includes license fee, exam fee, and first triennial registration fee.

a) Class V gold foil no longer a clinical examination requirement.

\* SOURCE: The above information is compiled annually by American Student Dental Association and is published in the *ASDA Handbook*, Fall 1985, pages 78-82. Reprinted with permission of American Student Dental Association.

APPENDIX B

## Written Examination Requirements\*

Recognizes Certificate of  
National Board Dental Examinations

<u>State</u>	<u>Accepts Scores on National Board Exam</u>	<u>Time Limit (Years)</u>	<u>Additional Written Examinations</u>
Alabama	Yes	0	Yes
Alaska	Yes	0	Yes
Arizona	Yes	0	Yes
Arkansas	Yes	0	Yes
California	Yes	0	Yes
Colorado	Yes	15	—
Connecticut	Yes	0	Yes
Delaware	No <sup>1/</sup>	—	—
District of Columbia	Yes	—	—
Florida	Yes	10	Yes
Georgia	Yes	0	Yes
Hawaii	Yes	5	Yes
Idaho	Yes	0	Yes
Illinois	Yes	0	—
Indiana	Yes	0	Yes
Iowa	Yes	0	—
Kansas	Yes	0	Yes
Kentucky	Yes	0	—
Louisiana	Yes	—	—
Maine	Yes	—	—
Maryland	Yes	0	Yes
Massachusetts	Yes	5	Yes
Michigan	Yes	—	—
Minnesota	Yes	0	—
Mississippi	Yes	0	Yes
Missouri	Yes	—	—
Montana	Yes	0	Yes
Nebraska	Yes	0	—
Nevada	Yes	0	Yes
New Hampshire	Yes	0	Yes
New Jersey	Yes	0	Yes
New Mexico	Yes	—	—
New York	Yes	0	—
North Carolina	Yes	—	Yes
North Dakota	Yes	—	—
Ohio	Yes	0	Yes
Oklahoma	Yes	0	Yes
Oregon	Yes	0	Yes
Pennsylvania	Yes	0	—
Rhode Island	Yes	0	—
South Carolina	Yes	0	—
South Dakota	Yes	—	—
Tennessee	Yes	0	—
Texas	Yes	0	—
Utah	Yes	0	—
Vermont	Yes	0	—
Virginia	Yes	0	—
Washington	Yes	0	—
West Virginia	Yes	0	Yes
Wisconsin	Yes	0	—
Wyoming	Yes	—	—
Virgin Islands	Yes	—	—

\*For graduates of accredited dental schools. Data as of January 1, 1986.  
Source: Joint Commission on National Dental Examinations

<sup>1/</sup> Delaware conducts their own written examinations.

APPENDIX C

## Clinical Examination Requirements

<u>State</u>	<u>Regional Test</u> <sup>1/</sup>	<u>Time Limit (Years)</u>	<u>State Performance Examination</u>	<u>Limit to Times Taken</u>
Alabama	—	—	Yes	2 times and (c)
Alaska	—	—	Yes	—
Arizona	WREB	5	Yes	2 times and education
Arkansas	SRTA	5	—	3 times and (d)
California	—	—	Yes	Unlimited
Colorado	CRDTS	5	No	3 times
Connecticut	NERB	5	No	Unlimited
Delaware	—	—	Yes	—
District of Columbia (f)	NERB	5	Yes	3 times and education
Florida	—	—	Yes	3 times and education
Georgia	—	—	Yes	3 times and education
Hawaii	—	—	Yes	—
Idaho	WREB	—	No	—
Illinois	NERB	10	Yes	Unlimited
Indiana	—	—	Yes	—
Iowa	CRDTS	5	No	2 times, education and (c)
Kansas	CRDTS	5	No	2 times, education and (c)
Kentucky	SRTA	5	No	Unlimited
Louisiana (f)	—	—	Yes	3 times and education
Maine (f)	NERB	5	No	—
Maryland	NERB	5	No	2 times and education
Massachusetts	NERB	5	No	—
Michigan (f)	NERB	10	(e)	3 times and education
Minnesota	CRDTS	5	No	—
Mississippi	—	—	Yes	2 times and education
Missouri	CRDTS	5	No	3 times and education
Montana	WREB	3	No	—
Nebraska	CRDTS	5	No	2 times and education
Nevada	—	—	Yes	2 times and (b)
New Hampshire	NERB	5	No	(c)
New Jersey	NERB	15	No	—
New Mexico (f)	—	—	Yes	Unlimited
New York	NERB	0	Yes	2 times and (d)
North Carolina	—	—	Yes	Unlimited
North Dakota (f)	CRDTS	5	No	—
Ohio	NERB	5	No	2 times and education
Oklahoma	—	—	Yes	2 times and (c)
Oregon	—	—	Yes	Unlimited
Pennsylvania	NERB	—	No	—
Rhode Island	NERB	—	No	Unlimited
South Carolina (f)	—	—	Yes	Unlimited
South Dakota (f)	CRDTS	5	No	—
Tennessee	SRTA	5	Yes	—
Texas	—	—	Yes	3 times (c)
Utah (f)	WREB	3	No	—
Vermont	NERB	5	No	—
Virginia	SRTA	5	No	3 times
Washington	—	—	Yes	Unlimited
West Virginia (f)	NERB	—	No	—
Wisconsin	CRDTS	5	No	—
Wyoming (f)	CRDTS	5	Yes	2 times and education
Virgin Islands (f)	—	—	Yes	2 times and education

Data as of January 1, 1986 unless otherwise indicated.

- (a) Skip one testing before re-taking third time.
- (b) Must wait one year before re-taking.
- (c) Must have approval of the Board.
- (d) Remedial training.
- (e) Yes, for graduates of non-accredited schools.
- (f) 1982 data.

<sup>1/</sup>

CRDTS - Central Regional Dental Testing Service  
 NERB - Northeast Regional Board of Dental Examiners  
 SRTA - Southern Regional Testing Agency  
 WREB - Western Regional Examining Board

Source: Joint Commission on National Dental Examinations

APPENDIX D

## Summary of Requirements for Licensure by Credentials in Certain States Granting Licensure by Credentials

The states that grant licensure by credentials have individual requirements, of which the following is an overview. All states require a jurisprudence examination; however, this might be a formal, written examination, or a signed statement attesting that the candidate is familiar with the laws governing dentistry in the state. Candidates should write to the individual states for complete information and application.

State	Will accept applications from	Letters of recommendation	Personal interview	Years in practice
Arkansas	R	2	X	5
District of Columbia	Specialists Only		X	
Indiana	All states	3	X	5
Iowa	R	2	X	5
Kansas	R	5		5
Maine	All states	0	X*	5 <sup>1</sup>
Maryland	All states	3	X	5 <sup>1</sup>
Massachusetts	R	1	X	5
Michigan	On an individual basis	4	Rarely	No Limit
Minnesota	All states	4	X	2 <sup>2</sup>
Missouri	All states	2		5
Nebraska	All states	2	X	1 <sup>3</sup>
New Hampshire	R	3	X	5
New York	All states	3		5
North Dakota	Has an option, but has not granted licensure by credentials in 5 years			
Oklahoma	R	10		5
Pennsylvania	All states	2		5
Rhode Island	R	3		5
Tennessee	R	1 <sup>4</sup>		5
Vermont	At the discretion of the board	2		5

R = states that will issue licenses by credentials only to candidates from states with a reciprocal agreement.

\*The state of Maine will require a personal interview with a candidate who passed a state board examination more than 1 year before applying to Maine for a license.

<sup>1</sup>Will issue a licensure by credentials to candidates who pass the Northeast Regional Board Examination in lieu of active practice.

<sup>2</sup>Two years of the past 3 years must have been in active practice.

<sup>3</sup>This requirement will change to 3 years of active practice.

<sup>4</sup>One letter of recommendation from each state board in each state in which the dentist has practiced.

Source: "Licensure by Credentials — Is it Working?", report published in the *Journal of the American Dental Association*, Vol 111, July 1985, pages 19-32.

APPENDIX E

ALASKA DENTAL LICENSES ISSUED

Information presented in this appendix was compiled from the dental license issue log maintained by the Department of Commerce and Economic Development's Division of Occupational Licensing.

	June 1, 1980 through October 17, 1984 <sup>1/</sup>	October 17, 1984 through June 30, 1986	Total June 1, 1980 through June 30, 1986
Number issued based on credentials	8	14 <sup>2/</sup>	22
Number issued based on examination	<u>75</u>	<u>31</u>	<u>106</u>
Total number issued	<u>83</u>	<u>45</u>	<u>128</u>
By credentials as percentage of total	<u>9.6%</u>	<u>31.1%</u>	<u>17.2%</u>

<sup>1/</sup> The Alaska Board of Dental Examiners issued licenses based on candidates' credentials, pursuant to AS 08.36.234, from June 1, 1980 through October 17, 1984. At that time they ceased issuing licenses by credentials, by emergency order, as promulgated in 12 AAC 28.950.

<sup>2/</sup> Licenses issued based on reinterview of candidates previously denied licensure by credentials, as recommended by the Ombudsman's office and the Attorney General's office.

APPENDIX F

## Total Dental Licensure Results by State Board in 1981

State Board	Total	Passed	Percent passed	Failed	Percent failed
Alabama.....	87	84	95.5%	3	3.5%
Alaska <sup>1/</sup> .....	27	14	51.9%	13	48.1%
Arizona.....	137	137	100	0	0.0
Arkansas.....	49	49	100	0	0.0
California.....	1,535	781	50.9	754	49.1
CRDTS*.....	995	729	73.3	266	26.7
Colorado.....	225	225	100	0	0.0
Connecticut.....	191	191	100	0	0.0
Delaware.....	29	17	58.6	12	41.4
District of Columbia.....					
Florida.....	601	315	52.4	286	47.6
Georgia.....	200	200	100	0	0.0
Hawaii.....	26	16	61.5	10	38.5
Idaho.....	44	29	65.9	15	34.1
Illinois.....	507	469	92.5	38	7.5
Indiana.....	173	126	72.8	47	27.2
Iowa.....	122	122	100	0	0.0
Kansas.....	82	82	100	0	0.0
Kentucky.....	151	151	100	0	0.0
Maine.....	52	52	100	0	0.0
Maryland.....	305	305	100	0	0.0
Massachusetts.....	357	357	100	0	0.0
Michigan.....	95	95	100	0	0.0
Minnesota.....	188	188	100	0	0.0
Mississippi.....	52	39		13	
Missouri.....	218	218	100	0	0.0
Montana.....	30	30	100	0	0.0
Nebraska.....	98	98	100	0	0.0
Nevada.....	58	28	48.3	30	51.7
New Hampshire.....	47	47	100	0	0.0
New Jersey.....	478	478	100	0	0.0
New Mexico.....	42	36	85.7	6	14.3
New York.....	857	677	79	180	21.0
North Carolina.....	147	117	79.6	30	20.4
NERB*.....	2,628	2,280	86.8	348	13.2
North Dakota.....	31	31	100	0	0.0
Ohio.....	341	341	100	0	0.0
Oklahoma.....	130	130	100	0	0.0
Oregon.....	147	147	100	0	0.0
Pennsylvania.....	576	576	100	0	0.0
Rhode Island.....	42	42	100	0	0.0
South Carolina.....	91	91	100	0	0.0
South Dakota.....	40	32	80	8	20.0
SRTA*.....	597	572	95.8	25	4.2
Tennessee.....	166	166	100	0	0.0
Texas.....	519	464	89.4	55	10.6
Utah.....					
Vermont.....	22	22	100	0	0.0
Virginia.....	178	178	100	0	0.0
Washington.....	237	149	62.9	88	37.1
West Virginia.....	63	63	100	0	0.0
Wisconsin.....	211	211	100	0	0.0
Wyoming.....	47	32	68.1	15	31.9
WREB*.....	467	403	86.3	64	13.7
Puerto Rico.....	75	70	93.3	5	6.7
<b>TOTAL.....</b>	<b>15,726</b>	<b>12,488</b>	<b>84.5</b>	<b>2,298</b>	<b>15.5</b>

\*Regional Testing results are not included in totals.

Source: Council on Dental Education, American Dental Association.

1/

Alaska statistics were not published by the American Dental Association. Information included here was obtained from the Department of Commerce and Economic Development's Division of Occupational Licensing. Alaska results are not included in totals.

APPENDIX C

RECENT ALASKA DENTAL EXAMINATION STATISTICS

Information in this appendix was compiled and provided by the Department of Commerce and Economic Development's Division of Occupational Licensing.

	<u>November 1983</u>	<u>June 1984</u>	<u>November 1984</u>	<u>June 1985</u>	<u>November 1985</u>	<u>August 1986</u> <sup>4/</sup>
Number of applicants examined <sup>1/</sup>	18	18	18	34	25	20
Number Failed <sup>2/</sup>	6	16	8	21	16	5
Number Passed <sup>3/</sup>	12	2	10	13	9	15
Percentage Failure Rate	33.3%	88.9%	44.4%	61.8%	64.0%	25.0%
Percentage Pass Rate	66.7%	11.1%	55.6%	38.2%	36.0%	75.0%

<sup>1/</sup> Totals include candidates taking all or part of the examination.

<sup>2/</sup> Totals include candidates failing all or part of the examination.

<sup>3/</sup> Totals include candidates passing entire examination or those passing remaining parts not passed at prior examinations.

<sup>4/</sup> The dental examination scheduled for June 1986 was postponed until August 1986 in order that a new examination site could be located and to allow restructuring of the examination's content and scoring procedures.

APPENDIX H

EXAMINATION STATISTICS: WESTERN STATES AND REGIONAL TESTING BOARDS/AGENCIES

WASHINGTON - Over the last five years the failure rate for Washington state dental school graduates has been from 35% to 37%. Out-of-state graduates' failure rate has been approximately 50%. (These statistics include results from exam retakes - retake failure rate approximates 50%, regardless of whether candidates are in-state or out-of-state graduates.)

OREGON - Results from the most recent (June 1986) Oregon dental exam are as follows:

Number of candidates taking exam	70	(69 1st attempts)
Number Failing	7	
Number Passing	63	
Percentage Failure Rate	10%	
Percentage Pass Rate	90%	

Historically Oregon's passage rate has been in the 80 and 90 percentile range.

<u>CALIFORNIA</u> -	<u>1984</u> *	<u>1983</u> *
Number of candidates taking exam	1567	1884
Number Failing	753	849
Number Passing	814	1035
Percentage Failure Rate	48%	45%
Percentage Pass Rate	52%	55%

\* (Statistics exclude results of retakes by California dental school graduates.)

NEVADA - Current statistics related to pass/fail rates for Nevada state dental examinations were not available for release by the Nevada State Board of Dental Examiners.

WESTERN REGIONAL EXAMINING BOARD (WREB) - The average annual pass rate on the WREB exam for the past five years is 76.8%, with a high of 81% and a low of 67%. This equates to an average failure rate of 23.2%, with a high of 33% and a low of 19%.

CENTRAL REGIONAL DENTAL TESTING SERVICE (CRDTS) - CRDTS evaluates approximately 1000 dental candidates per year, including candidates repeating the examination. The 1985 failure rate for the operative clinical examination administered by CRDTS was 10.8%.

NORTHEAST REGIONAL BOARD OF DENTAL EXAMINERS (NERB) - In the past ten years, failure rates on the NERB examination have ranged from a high of 34.4% in 1983 to a low of 19.8% in 1985. A failure, in these calculations, is a candidate who fails at least one of the five tests in his/her first examination attempt.

SOUTHERN REGIONAL TESTING AGENCY (SRTA) - Dental examination pass/fail statistics are not generated on an annual basis by SRTA, but instead are prepared for specific test sites. This information was not made available.

1/ Information obtained in this appendix was provided by the individual state boards or regulating bodies and by representatives of the various regional boards or testing agencies.

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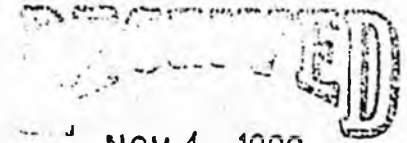
BILL SHEFFIELD, GOVERNOR

**DEPARTMENT OF COMMERCE &  
ECONOMIC DEVELOPMENT**

POUCH D  
JUNEAU, ALASKA 99811  
PHONE: 465-2500

OFFICE OF THE COMMISSIONER

November 3, 1986



LEGISLATIVE  
AUDIT

Mr. Gerald L. Wilkerson  
Legislative Auditor  
Division of Legislative Audit  
P.O. Box W  
Juneau, AK 99811

Dear Mr. Wilkerson:

Thank you for the opportunity to review and comment on the preliminary audit findings of the Board of Dental Examiners. At this time, the department's position to the audit recommendations remains as noted in our response to the interim letter dated September 10.

The department agrees with recommendation number one, and will assist the board in the repeal of 12 AAC 28.950. Prior to taking a position for or against recommendation number two, the department is seeking more information regarding regional testing and its feasibility. There are many factors which must be investigated. Recently, the chairman of the Dental Board attended the Western Regional Exam in California; we will be receiving a report on this exam at the next board teleconference meeting which is scheduled for November 13.

Sincerely,

  
Loren H. Lounsbury  
Commissioner

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103086a

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STEVE COWPER, GOVERNOR

**DEPARTMENT OF COMMERCE &  
ECONOMIC DEVELOPMENT**

POUCH D  
JUNEAU, ALASKA 99811  
PHONE: (907) 465-2534

*DIVISION OF OCCUPATIONAL LICENSING*

THE ALASKA BOARD OF DENTIAL EXAMINERS

Robert E. Warren, Chairman

December 16, 1986

DEC 22 1986

Gerald L. Wilkerson  
Legislative Auditor  
Division of Legislative Audit  
Pouch W  
Juneau, Alaska 99811-3300

Re: "A Special Report on The Department of Commerce and  
Economic Development, Board of Dental Examiners  
August 27, 1986" (Confidential Preliminary Audit)

Audit Control Number: 08-4271-86-S

Dear Mr. Wilkerson:

On behalf of the Alaska Board of Dental Examiners, I offer the following response to the above-referenced confidential Preliminary Audit Report. As you know, that Report contains two recommendations. The Board provisionally concurs with one recommendation but strongly disagrees with the other.

1. Areas of Agreement. Recommendation Number 2, set forth on pages 12-15 of the Report, proposes that "The Alaska Board of Dental Examiners should affiliate with one or more of the four existing regional testing services for the examination of dental candidate's [sic] clinical skills in lieu of administering a State-run clinical examination." (Report, page 12.)

The Board provisionally agrees with this recommendation and is in the process of taking active steps to implement it. Geographically, the most logical affiliation for Alaska is the Western Regional Examining Board (WREB). As noted in Appendix A to the Report (at page 20, note 4), the WREB includes Arizona, Idaho, Montana and Utah.

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Legislative Auditor  
Division of Legislative Audit  
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On September 28-30, 1986, the Board's Hygenist member, Chris Baxter, and I personally attended the WREB autumn, 1986 examination, which was conducted at Loma Linda University in Loma Linda, California. I directly observed the entire four-day examination as it was administered to the 70 dental candidates and the 31 hygenist candidates. In my professional opinion, the examination as administered by the WREB was comprehensive, thorough, and fair.

More recently, on December 5-6, 1986, I attended the WREB Examination Review Committee meeting in Phoenix, Arizona. While in Phoenix, I also attended the WREB General Membership Meeting and the meeting of the Board of Directors. My conclusion from my direct observations is that the WREB is a competent and highly professional testing agency.

At the upcoming January 15, 1987 meeting of the Alaska Board of Dental Examiners, the question of whether Alaska should join the WREB will be voted upon. Prior to the vote, I will present my field research and findings with respect to the WREB. Also, Dr. David Low, past President of the WREB and current Chairman of the WREB Examination Committee, will make a presentation. My recommendation will be that Alaska should join the WREB, thereby recognizing a passing grade on the WREB examination as satisfying the examination requirement of AS 08.36.130 and AS 08.36.160.

I might note in passing that only a portion of my travel expenses have been paid by the WREB and I have donated the balance of my travel expenses and my professional time. The State of Alaska has not absorbed any of these costs.

2. Areas of Disagreement. Recommendation Number 1, set forth at pages 11-12 of the Report, proposes that "The Alaska Board of Dental Examiners should issue dental licenses to qualified dentists based on their performance records in lieu of requiring they pass an examination. (Licensure

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by credentials)." The Board strongly disagrees with this Recommendation.

In our experience, licensure by credentials runs a serious and substantial risk of authorizing incompetent or otherwise undesirable individuals to practice dentistry in Alaska for two reasons. First, licensure by credentials provides inadequate opportunity to investigate and verify the applicant's professional, clinical skills. Second, because there is presently no central clearing house of professional dental information in the United States, it is extremely difficult to weed out individuals who are the subject of outstanding complaints or disciplinary review proceedings in other states. In practice, the Board has found licensure by credentials to be inconsistent with the Board's responsibilities as established by AS 08.36.070(a).

AS 08.36.234 establishes licensure by credentials as a permitted practice: "The [B]oard may provide for the licensing without examination of a dentist who [satisfies the criteria of subsections (1)-(8)]." (Emphasis added.) The decision whether or not to implement this practice must be made in light of the more basic responsibilities of the Board. AS 08.36.070(a) mandates that the Board shall:

- (1) examine applicants and issue licenses to the applicants it finds qualified;
- . . .
- (8) adopt regulations ensuring that renewal of registration is contingent upon proof of continued professional competence by a licensed dentist....

(Emphasis added.)

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As all dental patients know, the essence of dentistry is performing minutely delicate and precise procedures in the confined and extremely vulnerable area of the patient's mouth. In short, the practice of dentistry is at least as much craftsmanship as it is science. The only way to evaluate an individual dentist's abilities as a craftsman is to review examples of his work. The critical failure of licensing by credentials is that it does not adequately provide this review.

The premise of expedited licensing of dentists who have practiced for at least five years prior to applying for an Alaska license (See AS 08.36.234(3)) is that the prior period of practice in and of itself establishes technical professional competence. In reality, there are two flaws in this premise.

First, the standards of competence vary considerably from state to state and from region to region. Proof of continued professional competence is not required in many states. The consequence of accepting any individual's past practice as satisfactory credentials will, over time, lead to the lowering of competency standards in Alaska.

Second, in the case of dentists who have practiced in the military or in non-uniformed federal service (e.g., the Public Health Service), there has been no requirement of board certification or state licensing agency review of their competence. In Alaska, this is a matter of particular concern, since many dentists come to Alaska either in military or non-uniformed federal service and practice in remote areas virtually unsupervised.

AS 08.36.234(4) requires, as a prerequisite to licensure by credentials, that the applicant "...is not the subject of an unresolved complaint, review procedure or disciplinary proceeding undertaken by a dental licensing jurisdiction." In

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reality, it is very difficult to verify this fact or to expose a misrepresentation of fact by an applicant. There presently exists no central clearing house of information regarding unresolved complaints or disciplinary proceedings. The varying privacy law standards of the several states has the effect of making this information unobtainable for many out-of-state applicants. And in the case of military and federal dentists, the individual may never have practiced in the state in which he or she obtained a license. In these instances the outside licensing-state board has no pertinent information on file, and only limited information about dental officers is available through a military commanding officer.

Our experience in Alaska with dentists licensed by credentials tends to confirm the seriousness of the risks of admitting incompetent or otherwise undesirable individuals into the practice of dentistry here. There have been numerous patient complaints against credentialled dentists filed with the State Division of Occupational Licensing. In one instance, the Board received a fortuitous report from the Illinois Attorney General's office that a licensed-by-credentials candidate had been charged with numerous counts of sexual abuse of patients in Illinois. Since these were pending charges that had not been entered of record, our earlier investigation of this applicant had not been able to uncover this information.

The Alaska Board of Dental Examiners' position on licensure by credentials is perhaps best summarized by Dr. George Hansen, President-Elect of the Alaska Dental Society. As he stated at the August 16, 1986 meeting of the Board of Dental Examiners, "If the Board's goal is to protect dentists' freedom to practice, there should be licensure by credentials. But if the goal of the Board is to protect the public, the Board must examine applicants."

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In closing, I would note for the record that none of the audit staff personnel who prepared the August 27, 1986 Special Report attended either a dental examination or a credentials interview.

Thank you for having given me this opportunity to respond to the Preliminary Report. My apologies for any inconvenience my delay in responding to the Report may have caused. In the interest of responding accurately to Recommendation Number 2, I concluded it would be best to wait until I returned from the December WREB Examination Review Committee meeting before composing this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. E. Warren 12/15/86".

ROBERT E. WARREN, D.D.S.  
Chairman  
Alaska Board of Dental Examiners

rew:dkd

# STATE OF ALASKA

AUDIT DIVISION  
POUCH W  
JUNEAU, ALASKA 99811-3300

## THE LEGISLATURE BUDGET AND AUDIT COMMITTEE

January 6, 1987

Members of the Legislative Budget  
and Audit Committee:

We have reviewed the Alaska Board of Dental Examiner's response to our preliminary report. Our comments follow:

### Recommendation No. 1

There is nothing in the Board's response to make us change our position regarding dental licensure by credentials. Alaska Statute 08.36.234 is intended to provide a means for dental licensure without examination through the evaluation of a practicing dentist's theoretical knowledge and clinical skill based on their performance record. To this end, the provisions and requirements appear reasonable. Verification of a candidate's compliance with these provisions can be assured with minimal investigation if questions arise concerning the authenticity or validity of information provided on the candidate's application for licensure.

### Investigations

The State of Alaska is currently active with the National Disciplinary Information System (NDIS). NDIS is a project of the National Clearinghouse on Licensure, Enforcement, and Regulation (CLEAR) which reports bi-monthly on disciplinary actions taken against licensed professionals in a number of professional disciplines. Its purpose is to alert state authorities and board members to disciplinary actions taken in other states so more complete information can be obtained about licensed professionals in their state. Review of reports provided through NDIS in conjunction with the review of a credential candidate's application provides an additional means for verifying that all final disciplinary actions have been disclosed.

Division of Occupational Licensing staff have stated that they do not foresee insurmountable difficulties in performing additional investigations and background checks of individual applicants if requested by the Board. Investigations of this nature commonly would identify and disclose situations where dentists are the subject of an unresolved

complaint, review procedure, or disciplinary proceeding undertaken by a dental licensing jurisdiction. The existence of unresolved issues of this nature may serve as grounds for denial by the Board of licensure without examination pursuant to AS 08.36.234(4).

It is our belief that Alaska law currently provides the Board adequate opportunity and means to investigate and verify a credential applicant's qualifications, as well as identify situations where incomplete or questionable information is attested to by applicants on their application for dental licensure.

#### Technical Ability and Professional Competence

We concur with the Board's belief that the only way to evaluate an individual dentist's abilities as a "craftsman" (technical skill) is to review examples of his/her work; however, we disagree that licensure by credentials is critically flawed in that it does not provide consideration of this issue.

In order to obtain a dental license in Alaska based on credentials, a candidate must possess a license from another state, territory, or region with licensing requirements at least equivalent in scope, quality, and difficulty to those of this state at the time of licensure (AS 08.36.234(2)). In all jurisdictions, initial licensure is based, at least in part, on the successful completion of a clinical examination wherein a dentist's "craftmanship" is assessed. This requirement, coupled with the requirement that an applicant has been engaged in continuous active practice averaging at least 20 hours per week for each of the five years immediately preceding the application (AS 08.36.234(3)), serve to evidence adequate clinical skill and continued application of those skills.

The requirement of five years of practice prior to eligibility for licensure by credentials is not intended to, nor does it, in and of itself establish technical professional competence as is suggested by the Board. It is a combination of this requirement, the requirement that an applicant be licensed in another jurisdiction, as well as fulfillment of the other requirements of AS 08.36.234, that serve as a basis for deeming a credential candidate technically and professionally competent to practice dentistry in Alaska.

#### Patient Complaints

Complaints lodged with the Division of Occupational Licensing do not support the Board's contention that there have been numerous complaints against credentialed dentists and,

as a result, a serious risk incurred from licensing dentists in this manner. Our review of the Division's complaint logs identified a total of 47 complaints filed since June 1, 1980 involving 35 individual dentists, only one of whom was licensed by credentials.



Gerald L. Wilkerson, CPA  
Legislative Auditor  
Division of Legislative Audit