

States that Have Suspended or Authorized Suspension of Licensure and Testing Requirements for Graduates of Oral Health Programs

The following is a list of states that have suspended or authorized a state board or agency to suspend aspects of testing or clinical requirements for recent graduates of oral health programs. Some of the authorizations may require additional action by a licensing board or agency before testing or licensure laws are suspended. This list should be used as a guide for examples of state actions and is not intended to be legal advice.

Research is current as of 5/6/2020.

State	State Details
Arizona	<p>Directive for Licensing Boards Executive Order 2020-17 – Requires a state agency or board that issues licenses to:</p> <ol style="list-style-type: none"> a. Suspend any rules that prevent or limit the amount of online or alternative learning hours permitted to issue or renew a license b. Make every attempt to implement electronic or remote format examinations for licensure when feasible c. If an examination cannot be provided via electronic or remote format, issue a provisional license to an applicant who has met all other requirements, but who is unable to take the required examination due to closure of testing centers and unavailability of electronic or remote testing options. <ol style="list-style-type: none"> i. Provisional licenses are valid for six months ii. Provisional licenses will be suspended 20 days after in person testing centers reopen or exams otherwise become available d. Applies to Board of Dental Examiners and many other licensing boards e. State agencies and boards will defer requirements to renew licenses that have an expiration date between March 1, 2020 and September 1, 2020 by six months from the expiration date. f. State agencies and boards will suspend any rules that prevent or limit the amount of online or alternative learning hours permitted to issue or renew a license
California	<p>Executive Order N-39-20 - Allows the director of the state’s Department of Consumer Affairs, for the duration of the declared state of emergency, to waive any of the professional licensing requirements and amend scopes of practice. Under the executive order, professional licensing requirements include—but are not limited to—the examination, education, experience and training requirements necessary to obtain and maintain licensure, and requirements governing the practice and permissible activities for licensees.</p>
Idaho	<p>The Idaho Board of Dentistry has authorized the issuance of a temporary license for dentist and dental hygienist licensure applicants who have met all other qualifications for licensure by examination but are unable to complete a clinical</p>

	<p>board examination as a result of the COVID-19 pandemic. Issuance of a license under this authority and as a result of the COVID-19 pandemic will have an effective period of six months and will require the licensee to be indirectly supervised by an Idaho licensed dentist. The special status license becomes void once the person passes a clinical exam as required by the Idaho Board of Dentistry, or is no longer eligible to take a clinical exam (due to failures), or after six months. If the applicant is unable to find a clinical exam being offered within the six month period, the board may extend the special status license for an additional six months on a case-by-case basis.</p>
Iowa	<p>Update from Dental Board – “At our April 3, 2020 meeting, the Board approved a waiver for D4 students at the University of Iowa, which permits a modified clinical exam. This includes the manikin portion of our current clinical exam plus an objective structured clinical exam. We are diligently working through options for hygiene students as well and are hoping to have more to report soon.”</p>
Kansas	<p>Executive Order 20-26 - Suspends all provisions in Kansas law or regulations that require health care professionals to take an exam as a condition of licensure or renewal, to the extent the exam’s administration has been cancelled while the state’s emergency declaration is in effect.</p>
Kentucky	<p>Memorandum from the Board of Dentistry - Dental and dental hygiene school graduates who are unable take the clinical examination but meet all other licensure requirements are eligible to receive a temporary license so long as they practice under the direct supervision of a dentist with at least five years of experience. All provisional licenses shall expire 90 days after the order to postpone elective procedures is rescinded.</p>
Louisiana	<p>Proclamation Number 38 JBE 2020 - Temporarily suspended the requirement that clinical dental licensing exams and clinical dental hygiene licensing exams include procedures performed on human subjects. This proclamation applies to graduates of CODA accredited programs in Louisiana who have otherwise completed licensure applications.</p> <p>Proclamation 41 JBE 2020 - Grants the Louisiana State Board of Dentistry the authority to issue licenses based on a 2020 graduation from a Louisiana-based, CODA-accredited program. Individuals must apply and complete their applications in 2020.</p> <p>HB 836 - A bill filed in the state legislature on March 31 would allow the state Board of Dentistry to waive or modify requirements that applicants for licensure as dentists or dental hygienists pass an examination that includes procedures performed on human subjects. This bill is pending consideration by the legislature.</p>
Maine	<p>Board of Dental Practice Guidance - At its April 17, 2020 meeting, the Board voted to accept the CompeDont™ Tooth as an alternative to the Restorative Section of the American Board of Dental Examiners examination administered by the</p>

	<p>Commission on Dental Competency Assessments (CDCA) and the Council of Interstate Testing Agencies (CITA). The Board will consider other examinations as they become available for review such as any alternative to the dental hygiene examination, the live patient examination required for the periodontal section, as well as the Dental Licensure Objective Structured Clinical Examination that is anticipated to be released by the Joint Commission on National Dental Examinations.</p>
<p>Michigan</p>	<p>Executive Order 2020-30 (Section 8.a.) – Temporarily suspends any law or regulation that requires any health care professional, as a condition of licensure, to pass an exam, to the extent that the exam’s administration has been canceled while the emergency declaration is in effect.</p>
<p>Oklahoma</p>	<p>The Oklahoma Board of Dentistry issued a resolution allowing candidates for dental licensure to fulfill the live patient portion of the dental exam between May 1, 2020 and December 31, 2020 by one of the following methods:</p> <ol style="list-style-type: none"> 1. Providing written documentation that procedures required to be completed on a clinical examination by statute, were completed on a live patient during their class studies, clinic, or residency at a CODA approved school. The documentation must include a signed statement from the student, the supervising dentist, and the dean of the dental school. 2. Requesting a temporary emergency dental license, to work with a supervising dentist, and upon finding patients that meet criteria that would allow the candidate to demonstrate clinical skills required by statute, request the board assign a designated board examiner to validate treatment was correctly completed. 3. Demonstrating treatment on a live patient during a regional exam, if possible. <p>The resolution lists the following requirements for applicants seeking a dental hygiene license between May 1, 2020 and December 31, 2020:</p> <ol style="list-style-type: none"> 1. Graduation from a CODA accredited program. 2. Documentation of live patient clinical treatments with an evaluation of specific clinical skills required by statute, as well as compliance with professional standards. The documentation must include a signed statement from the applicant as well as the director of the dental hygiene program. 3. Requesting a temporary emergency license, to work with a supervising dentist, and upon finding patients that meet criteria that would allow the applicant to demonstrate clinical skills required by statute, request the board assign a designated board examiner to validate treatment was correctly completed. 4. Completion of a live patient exam, if available.

	<p>Executive Order 2020-13 - Requires all state agencies with licensing authority over medical professionals to promulgate rules that increase opportunities for students and recent graduates who are not yet fully licensed to practice. Any license issued pursuant to emergency rules is valid while this Order is in effect.</p>
Oregon	<p>At the April 24, 2020 Board meeting, the Oregon Board of Dentistry clarified that the dental practice act allows it to accept the results of examinations administered by regional and national testing agencies or clinical board examinations administered by other states. This includes regional or national testing agencies who may administer an Objective Structured Clinical Examination (OSCE) clinical board examination, or other modality, to fulfill the clinical board examination requirement for dental and dental hygiene licensure in Oregon.</p>
Pennsylvania	<p>On April 24, the Pennsylvania Department of State issued a summary of waivers and suspensions to the examination process for dentists and dental hygienists granted by Governor Tom Wolf.</p> <p>Under the waivers and suspensions issued by Gov. Wolf, the following apply to prospective dentists:</p> <ul style="list-style-type: none"> • The periodontal/scaling portion of the clinical exam has been waived. • The State Board of Dentistry is allowed to temporarily accept a substitute for the live-patient restorative (filling) component of the dental clinical exam. Specifically, the board has the authority to accept the ADEX non-patient-based restorative dentistry exam administered by CDCA and CITA for the 2020 administration of the clinical dental exam. This exam makes use of ADEX's CompeDont manikin tooth. • The board has also been granted permission to accept any other nonpatient-based restorative dentistry examination developed/offered by the other three regional examining bodies, provided that the board finds them to be psychometrically sound, valid, reliable and legally defensible. <p>The following waivers and suspensions apply to prospective dental hygienists:</p> <ul style="list-style-type: none"> • The requirement that candidates pass the patient treatment clinical exam (PTCE) is temporarily suspended. This suspension will remain in place until either patient-based clinical examinations can safely resume, or a non-patient-based clinical exam is developed for hygienists. (Any nonpatient-based clinical exam for hygienists will have to first be accepted by the board as psychometrically sound, valid, reliable and legally defensible). • As they await resumption of the PTCE, dental hygienist candidates who have satisfied all other requirements of licensure may apply for a provisional license from the department. The provisional license will allow these individuals to practice until it is safe for them to take the patient-based

	<p>examination or until a manikin-based clinical examination for hygienists becomes available.</p> <p>For dental hygienists who wish to apply for a local anesthesia permit, a provisional license will satisfy the requirement that they hold “a current license in good standing.”</p>
Tennessee	<p>Executive Order No. 28 - Suspends the requirement that persons applying for licensure as a dentist complete a live human patient examination to permit the Board of Dentistry to grant licensure to persons graduating this year from a dental school accredited by CODA, if such persons have:</p> <ul style="list-style-type: none"> • completed the other licensure requirements • met all of the requirements for competency promulgated by the CODA • been certified by the dean of their CODA-accredited dental school as qualified, competent, and fit to practice dentistry.
Texas	<p>On May 1, the Texas State Board of Dental Examiners issued a statement clarifying that the board will accept results from regional exams that do not include a live patient that also comply with applicable state statutes and rules. The statement applies to candidates for licensure as a dentist and candidates for licensure as dental hygienists.</p>
Utah	<p>At its April 17, 2020 meeting, the Utah Board of Dentistry voted to accept results from clinical examinations that make use of a manikin in lieu of live patients for both dentists and dental hygienists. The board also voted to grant temporary licenses to dentists and dental hygienists that are valid until an exam becomes available. (Votes can be listened to on the Audio 2 MP3 recording that can be found on the webpage in the above link. Vote to accept manikin exams for dentists can be found at 58:40. A vote to grant temporary licenses for dentists can be found at 1:02:40. A vote to grant temporary licenses to hygienists as well as acceptance of an exam involving a manikin can be found at 1:09:39).</p>
Vermont	<p>HB 742 - Allows a licensing board to grant a temporary license to a graduate of an approved education program during a period when licensing examinations are not reasonably available. Provides that a temporary license authorizes the holder to practice for up to 90 days and allows the license to be reissued by the board if the declared state of emergency continues longer than 90 days.</p>
Washington	<p>At its April 2, 2020 meeting, the Board of Dentistry voted to accept results from the DLOSCE as evidence of having meet clinical exam requirements needed for initial licensure under state law. This was done by passing an emergency rule which is valid for 120 days after the rule is filed.</p>
West Virginia	<p>Executive Order No. 31-20 – Suspends rules and laws, subject to the discretion of the Board of Dentistry that require an applicant for initial licensure as a dentist or dental hygienist pass a clinical examination. Grants the Board of Dentistry discretion to award a provisional license to an applicant for initial licensure as a dentist or dental hygienist who is a 2020 graduate of a program approved by the Board and</p>

	who meets all other requirements for licensure. The provisional license will expire February 1, 2021, and will only become a full license after an applicants has passed the required clinical exam. Failure of a clinical exam will void the provisional license.
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