



# STATE OF IOWA

## IOWA DENTAL BOARD

TERRY E. BRANSTAD, GOVERNOR  
KIM REYNOLDS, LT. GOVERNOR

MELANIE JOHNSON, J.D.  
EXECUTIVE DIRECTOR

### DENTAL HYGIENE COMMITTEE

#### AGENDA

(Revised 1/18/11)

January 25, 2011  
9:30 a.m.

**Location:** Iowa Dental Board, 400 SW 8<sup>th</sup> St., Suite D, Des Moines, Iowa

**Committee Members:** *VaLinda Parsons, R.D.H., Chair; Gary Roth, D.D.S.; Marijo Beasler, R.D.H.*

9:30 a.m.     **I.    OPEN SESSION**     *VaLinda Parsons*

1. Call to Order, Roll Call
2. Election of Officers
3. Approval of Open Session Minutes
  - October 14, 2010 Meeting
  - November 2, 2010 Telephonic Meeting
4. Administrative Rules: Final Rule Amendments for 650--Chapter 11, "Licensure to Practice Dentistry or Dental Hygiene," 650--Chapter 12, "Dental and Dental Hygiene Examinations" (Notice ARC #9243B)
  - Dental Hygiene Committee's Recommendation for Adoption of Final Rule Amendments Re: Clinical Examination(s) Accepted for Licensure of Dental Hygienists
5. Review of Recommendation Re: CRDTS Dental Hygiene Examiners (Added 1/18/11)

**II.    APPLICATIONS FOR LICENSURE\***  
**(OPEN/CLOSED SESSION)**

- Ann T. Burbach, R.D.H.

**III.    COMPLAINTS & OTHER REQUESTS\***

**(CLOSED SESSION)**

**IV. RECONVENE IN OPEN SESSION**

**V. OPEN SESSION ACTION, IF ANY, ON CLOSED SESSION AGENDA ITEMS**

1. Committee Recommendations Re: Licensure applications
  - Ann T. Burbach, R.D.H.
2. Committee Recommendations Re: Statement of Charges; Combined Notice of Hearing, Settlement Agreement and Final Order; and Settlement Agreements **(Updated 1/18/11)**
3. Other Committee Recommendations

If you require the assistance of auxiliary aids or services to participate in or attend the meeting because of a disability, please call the office of the Board at 515/281-5157.

\*This portion of the meeting may be conducted in closed session to discuss confidential matters that may concern examination information, peace officers' investigative reports, attorney records related to litigation, patient records and reports on the condition, diagnosis, care or treatment of a patient, or investigation reports and other investigative information which is privileged and confidential under the provisions of Sections 22.7(2), 22.7(4), 22.7(5), 22.7(9), 22.7(19), and 272C.6(4) of the 2009 Code of Iowa.

These matters constitute a sufficient basis for the committee to consider a closed session under the provisions of section 21.5(1), (a), (c), (d), (f), (g), and (h) of the 2009 Code of Iowa. These sections provide that a governmental body may hold a closed session only by affirmative public vote of either two-thirds of the members of the body or all of the members present at the meeting to review or discuss records which are required or authorized by state or federal law to be kept confidential, to discuss whether to initiate licensee disciplinary investigations or proceedings, and to discuss the decision to be rendered in a contested case conducted according to the provisions of Iowa Code chapter 17A.

***Please Note: The times given for discussion of agenda items are approximate times and are intended to serve only as a general guide. The actual time of the discussion of each agenda item may occur earlier or later th***



# STATE OF IOWA

## IOWA DENTAL BOARD

CHESTER J. CULVER, GOVERNOR  
PATY JUDGE, LT. GOVERNOR

MELANIE JOHNSON, J.D.  
EXECUTIVE DIRECTOR

**(1/02/11) DRAFT OCTOBER 14, 2010, MINUTES – SUBJECT TO FINAL COMMITTEE APPROVAL**

**IOWA DENTAL BOARD  
DENTAL HYGIENE COMMITTEE  
OPEN SESSION MINUTES**

**October 14, 2010  
IDB Conference Room  
400 S.W. 8<sup>th</sup> St., Suite D  
Des Moines, Iowa**

**Committee Members**

Gary D. Roth, D.D.S. Present  
VaLinda J. Parsons, R.D.H., Chair Present  
Marijo A. Beasler, R.D.H. Present

**Staff Members**

Melanie Johnson, Jennifer Hart, Phil McCollum

**Attorney General's Office**

Theresa O'Connell Weeg, Assistant Attorney General

**CALL TO ORDER FOR NOVEMBER 16, 2010**

Chairman Parsons called the meeting of the Dental Hygiene Committee of the Iowa Dental Board to order at 9:30 a.m. on Thursday, October 14, 2010. A quorum was established with all three members present.

**Roll Call:**

<u>Member</u>	<u>Beasler</u>	<u>Parsons</u>	<u>Roth</u>
Present	x	x	x
Absent			

**APPROVAL OF MINUTES**

- ❖ MOVED by Beasler, SECONDED by Roth, to approve the minutes of the July 14, 2010, Dental Hygiene Committee meeting. Motion APPROVED unanimously.

**POLICY DISCUSSION: RDH AND EXPANDED FUNCTIONS**

Dental assistant registration became effective in July 2001. 650 IAC 20.2(153) states that the term “dental assistant” does not include persons otherwise actively licensed in Iowa to practice dental hygiene or nursing who are engaged in the practice of said profession. Rules related to expanded functions for dental assistants became effective in 2004.

Board rules have been interpreted to mean that licensed dental hygienists can work as dental assistants under the scope of their dental hygiene license – when registration became effective, there were no “regular” duties that dental assistants perform that a license to practice dental hygiene does not also authorize. Therefore after registration was effective, board staff administratively lapsed the dental assistant registration of any person who subsequently became licensed as a dental hygienist. Exact numbers of assistants/hygienist affected by this change are impossible to determine with the existing database; staff estimate approximately 50 hygienist per year since 2002.

After expanded function rules became effective in 2004, the board office received a few inquiries as to whether dental hygienists were also eligible to take expanded function training. These persons were advised that board rules do not authorize hygienists to take expanded function training.

In the past few months, the board has received two inquiries asking again whether a hygienist can perform expanded function duties. In both of these cases the hygienist in question had previously been registered as a dental assistant, although the hygienist had not trained in expanded function duties at that time. The committee agreed that dental hygienists would be qualified to take expanded function training. The committee felt the duties would fall within the scope of the dental hygiene license if the hygienist completed training equivalent to that required of dental assistants. These

- ❖ MOVED by Roth, SECONDED by Beasler, to draft administrative rules to authorize dental hygienists to perform expanded functions under the direct supervision of a dentist. The rules should be modeled after the rules for dental assistant expanded function duties. Motion APPROVED unanimously.

**CLOSED SESSION**

- ❖ MOVED by Roth, SECONDED by Beasler, to go into closed session pursuant to Iowa Code Section 21.5(1)(a) to review and discuss records which are required by state law to be kept confidential.
- ❖ Roll Call:

<u>Member</u>	<u>Beasler</u>	<u>Parsons</u>	<u>Roth</u>
Aye	x	x	x
Absent			

Motion APPROVED by ROLL CALL.

- The committee convened in closed session at 9:45 a.m.

**ADJOURNMENT**

Chairman Parsons adjourned the meeting at 10:15 a.m.

Respectfully submitted,

Melanie Johnson, J.D.  
Executive Director

MJ/jh



# STATE OF IOWA

## IOWA DENTAL BOARD

CHESTER J. CULVER, GOVERNOR  
PATY JUDGE, LT. GOVERNOR

MELANIE JOHNSON, J.D.  
EXECUTIVE DIRECTOR

**(1/02/11) DRAFT NOVEMBER 2<sup>nd</sup> MINUTES – SUBJECT TO FINAL BOARD APPROVAL**

**IOWA DENTAL BOARD  
DENTAL HYGIENE COMMITTEE  
- TELEPHONIC MEETING -  
OPEN SESSION MINUTES  
November 2, 2010  
Origination from IDB Conference Room  
400 S.W. 8<sup>th</sup> St., Suite D  
Des Moines, Iowa**

**Committee Members**

Gary D. Roth, D.D.S.	Present
VaLinda J. Parsons, R.D.H., Chair	Present
Marijo A. Beasler, R.D.H.	Present

**Staff Members**

Melanie Johnson, Jennifer Hart, Christel Braness, Phil McCollum, Dee Ann Argo, Janet Arjes.

**Attorney General's Office**

Theresa O'Connell Weeg, Assistant Attorney General

**CALL TO ORDER FOR NOVEMBER 16, 2010**

Chairman Parsons called the telephonic meeting of the Dental Hygiene Committee of the Iowa Dental Board to order at 12:05 p.m. on Tuesday, November 2, 2010. A quorum was established with all three members present.

Roll Call:

<u>Member</u>	<u>Beasler</u>	<u>Parsons</u>	<u>Roth</u>
Present	x	x	x
Absent			

Pursuant to the authority of, and in compliance with Iowa Code Section 21.8(2009), the meeting was held by electronic means. This meeting was held by conference call to consider ratification

of a list of dental hygiene CRDTS examiners and proposed rules concerning the acceptance of the WREB examination for dental hygiene licensure by examination. It was impossible for the Board to schedule a meeting on such short notice and impractical for the Board to meet with such a short agenda.

### **OPPORTUNITY FOR PUBLIC COMMENT**

Ms. Parsons opened the meeting to hear comments from the public. No comments were provided.

### **RATIFICATION OF DENTAL HYGIENE EXAMINERS**

The committee reviewed a list of Iowa licensed hygienists that were recommended to the committee to serve as potential CRDTS examiners.

- ❖ MOVED by ROTH, SECONDED by BEASLER, to approve the list of Iowa dental hygienists submitted to CRDTS for consideration as examiners. Motion APPROVED unanimously.

### **RULES: WREB EXAMINATION FOR HYGIENE LICENSURE**

The committee considered a proposed notice of intended action to remove WREB from the list of exams approved for licensure by examination for dental hygiene applicants. The intent of the proposed rules is to ensure the board has authority and input in the hygiene examination administered in this state.

- ❖ MOVED by ROTH, SECONDED by BEASLER, to file Notice of Intended Action to amend the dental hygiene rules on licensure by examination to remove WREB from the list of examinations accepted. Motion APPROVED unanimously.

### **ADJOURNMENT**

Chairman Parsons adjourned the meeting at 12:15 p.m.

Respectfully submitted,

Melanie Johnson, J.D.  
Executive Director

MJ/jh

# REPORT TO THE DENTAL HYGIENE COMMITTEE

REQUEST FOR  
COMMITTEE  
RECOMMENDATION

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**DATE OF MEETING:** January 25-26, 2011  
**RE:** Rules – Final Rule Amendments for Chapters 11 and 12 (Notice ARC #9243B)  
**SUBMITTED BY:** Melanie Johnson, Executive Director  
**ACTION REQUESTED:** Recommendation to Board Re: Final Rule Amendments

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On November 2, 2010 the Board approved the filing of proposed rules to amend Chapter 11, “Licensure to Practice Dentistry or Dental Hygiene,” and Chapter 12, “Dental and Dental Hygiene Examinations.” The purpose of the proposed amendments is to establish Central Regional Dental Testing Service, Inc. (CRDTS) as the examination the Dental Board will recognize for purposes of licensure in Iowa as a dentist or dental hygienist. The amendments would remove Western Regional Examining Board, Inc. (WREB) and American Board of Dental Examiners, Inc. (ADEX) from the list of allowable examinations for purposes of licensure in the state.

A public hearing was held on December 21, 2010. Comments were received by e-mail, U.S. Mail and at the public hearing.

## **Options For Consideration By the Committee**

The proposed rules are now eligible for final adoption. The Committee makes recommendations about amendments that apply to dental hygiene rules. There are a number of options available to the Committee. It could recommend to the full Board the:

1. Adoption of final rule amendments as proposed, no changes.
2. Adoption of final rule amendments with changes in response to the comments received. For example, adopt final amendments that would:
  - Exempt 4<sup>th</sup> year students from the new rule amendment.
  - Permit anyone who has taken WREB prior to July 1, 2011 to qualify for licensure by examination.
3. Adoption of a Notice of Termination and terminating the rulemaking.
4. Deferring action until a later date. This Notice of Intended Action will expire on May 30, 2011.

## **Attached for review**

- ❖ Copy of the Notice of Intended Action (proposed amendments).
- ❖ Copies of written comments received.

**PUBLIC COMMENTS RECEIVED**

ARC # 9243B: Proposed amendments to clinical examinations for dentists and dental hygienists.

<b>Date Received</b>	<b>Description</b>
11/16/10	11/15/10 Letter from George North, D.D.S. (past IDB Chair)
11/18/10	11/17/10 Letter from Fred Riddle, D.D.S. (past IDB Chair, former UI faculty, IDA member)
12/02/10	12/02/10 E-mail from Eric Shell (resident graduate student at U I College of Dentistry)
12/02/10	12/02/10 1 <sup>st</sup> e-mail from Samantha Humke (4 <sup>th</sup> year dental student at U I College of Dentistry)
12/02/10	12/02/10 2nd e-mail from Samantha Humke (4 <sup>th</sup> year dental student at U I College of Dentistry)
12/04/10	12/04/10 E-mail from Martin Halbur (dentist)
12/04/10	12/04/10 E-mail from Derek Borgwardt (3 <sup>rd</sup> yr. periodontics resident at U I College of Dentistry)
12/05/10	12/05/10 E-mail from Thomas Peek (U I College of Dentistry associate adjunct professor)
12/06/10	12/06/10 E-mail from Joe Royce forwarding U I College of Dentistry comments from Dean Johnsen
12/06/10	12/01/10 Letter from Dean Johnsen
12/07/10	12/07/10 E-mail from Bill Johnson (U I College of Dentistry professor)
12/08/10	12/06/10 Letter from LeRoy Strohman (past IDB Chair)
12/10/10	Undated Letter from U of I College of Dentistry, Class of 2011
12/12/10	12/12/10 E-mail from Eileen Cacioppo, RDH
12/13/10	12/06/10 Letter from WREB Executive Committee
12/13/10	12/08/10 Letter from Family Dentistry Adjunct Faculty
12/13/10	12/13/10 Letter from Kirstina Gratz (4 <sup>th</sup> year UI dental student)
12/16/10	12/14/10 Letter from Dr. Ruth Spieker, D.D.S.
12/20/10	12/20/10 E-mail from Dr. Stephen Thies
12/20/10	12/20/10 E-mail from Adam Freed – ltr. from Catherine Cownie on behalf of IDA
12/21/10	12/21/10 E-mail from Dr. Mike Kanellis, D.D.S. w/letter attached

N



**George F. North, D.D.S., P.C.**  
511 N. Main Street  
Allison, Iowa 50602  
Phone 319-267-2739

November 15, 2010

**RECEIVED**

NOV 16 2010

**IOWA DENTAL BOARD**

TO: Iowa Board of Dentistry

FROM: Dr. George North DDS, PC

This letter is in support of the Dental Board's proposed rule change as it relates to the Dental Board's responsibility in the examination process.

The Board's obligation to select, participate and monitor the examination process is one of the Board's major responsibilities in it's mandate to protect the citizens of Iowa.

Selection of the examination and participation in it's development and maintenance, as well as participating in the administration of such examination is a paramount responsibility of the Dental Board. The Board must be involved in the PROCESS and selection of the examination.

Thank you,

Dr. George F. North DDS., PC.  
Past Chair Iowa Dental Board

GFN/sw

Cc: Gary Roth

Dr Fred A. Riddle, D.D.S.  
108 E Market Street  
Iowa City, Iowa 52245  
Office: 319-338-1171  
FAX: 319-337-8350  
FARDDS@aol.com

November 17, 2010

To Whom It May Concern:

As a former faculty member of the UI dental school, IDA member, and a former chair of the Board of Dental Examiner, I feel that I must express my concern about the CRDTS/WREB/ no board exam controversy.

The role of all dentists is to protect the public. We all know that there are occasionally some people, that without a testing method to determine competence, would do harm to not only the public but also our profession.

When selected for the BDE, it has always been assumed (if not mandatory) that the non-public members would be examiners for a trusted and creditable testing organization. In Iowa, that has been CRDTS. As a state, we are always represented and have had our Iowa members in positions that represent us. If something is wrong, we have been in position to make corrections. This is **NOT** true with WREB or any other testing agency.

CRDTS also has a policy to allow selected faculty members to view the exam. It has usually been shocking to those people, on how well done the exam is. It has also made these people aware of some of the inadequate treatment done by those who have failed. I do not understand why anybody would prefer bringing in another testing agency or even multiple testing agencies in Iowa. We have no representation anywhere other than with CRDTS. Furthermore, our members of the BDE have only so much time to test for the people of Iowa. Belonging to multiple testing agencies would be ridiculous.

Therefore, I am asking the IDA and the UI dental school to stand down. Allow the Board to continue with CRDTS and then allow those who pass exams elsewhere for WREBS or other approved testing agencies to be once again granted reciprocity from the BDE.

Sincerely,



Fred Riddle, D.D.S.

## Johnson, Melanie [IDB]

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**From:** Shell, Eric R [eric-shell@uiowa.edu]  
**Sent:** Thursday, December 02, 2010 5:44 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** Disagreement with CRDTS only licensing

Dear Ms. Johnson,

I am writing to disagree with the decision of the Iowa Dental Board to only accept CRDTS for licensing in Iowa, and urge the dental board to reverse its decision.

As a resident graduate student here at the University of Iowa, this decision will affect me and those I might treat. Due to this decision, I will not be staying in Iowa after residency completion, since I did not take CRDTS. My dental school offered another exam. I do not find it cost effective or ethical to take another exam now. It is hard enough finding qualifying patients for one exam. There are ethical concerns such as students watching lesions that should be immediately restored, and patients charging students large sums of money at the last minute just to go to the examination area for grading. As much as I might want to stay in Iowa, I will absolutely not place myself or patients in this situation again, when I can easily go elsewhere to practice. How much will the quality and access to care decrease in Iowa due to students and residents being forced to make this decision to leave?

Further, there is no objective evidence at all that one licensing agency provides better results in determining which practitioners will provide the best patient care. The licensing exam which I successfully completed has not been shown to be of lesser quality. None objectively have. State boards should be accepting more testing agencies, not less. I cannot help but note that the Iowa Dental Board is a member of the one testing agency that is proposed to be recognized, CRDTS. This decision has a component of self-interest, or minimally a conflict of interest, which should be made clear to the public and governing officials as part of this decision. Other state dental boards are members of certain testing agencies, but still accept other testing agencies for licensing. Many state dental boards accept all licensing agency results, and there is no evidence that access to, or quality of, care has decreased in these states. In fact, due to the actions of the Iowa Dental Board, access to care and quality of care may in fact improve in those other states.

Lastly, it is ironic to me that the Iowa Dental Board chooses not to recognize the licensing exam currently offered at the University of Iowa dental school. Is there a conflict between these two groups? Is there no communication or teamwork about how such decisions will affect quality and access of care? Why would the University of Iowa choose not to offer the exam recommended by the board? Why would the board not accept the exam that is currently recommended by the university? Is there something wrong with the university? Is there something wrong with CRDTS or the board? If I as a member of the profession have trouble determining the politics of the situation, how embarrassing will it be for our profession when the public starts trying to determine the politics?

This is a regretful decision that I understand was made via teleconference. I urge the board to meet together properly and reverse this decision, which is poor for our patients and our profession.

Sincerely,

Dr. Eric R. Shell  
University of Iowa  
Department of Orthodontics

**Johnson, Melanie [IDB]**

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**From:** Humke, Samantha S [samantha-humke@uiowa.edu]  
**Sent:** Thursday, December 02, 2010 9:08 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** WREB decertification

Dear Melanie,

On November 2, 2010, the Iowa Dental Board, under pressure from CRDTS profit holders, approved amendments to the Iowa Administrative Code to remove the Western Regional Examining Board (WREB) and the American Board of Dental Examiners (ADEX) examinations as qualifying for licensure in Iowa. This action would restrict initial licensure to graduates who have passed the Central Regional Dental Testing Service (CRDTS) examination.

I will be taking National boards on Dec. 21st and will not be able to attend the public meeting. For this reason I write:

There has never been a substantiated reason to decertify WREB. There has never been any evidence that WREB is an inferior exam. What there has been is a campaign of fallacious and widely publicized claims by CRDTS special interests that WREB is an inferior exam that is putting Iowan's health at risk.

The word that comes immediately to mind is: Libel.

Libel. A claim that is:

- 1) False
- 2) Public
- 3) Damaging

The fact that that the amendment got this far this fast would be startling were we not all witness time and again in politics to massive, momentous, emotional movements muscling their way about. Cerebrally inclined individuals scratch their heads in wonder...

I am referring to the Iowa College of Dentistry...who opposes this amendment to decertify WREB. Unfortunately academicians and scholars find themselves at a disadvantage in a fight of dirty politics because they hold themselves and their own arguments to the standards of logic and evidence. Their defense against sensationalistic attacks become tedious and boring, all weighed down as it is with facts and the truth.

Nevertheless...I make this attempt to write. Not because I am one of these intellectuals or academicians. I wish. No...I'm just one of the 4th year students. (Remember us...the students? The ones who have been collecting teeth and hiring assistants and recruiting patients and planning our futures?) If the 3rd criteria of libel is damage, then we students who will now be more limited in where we can practice and will have to change our preparation plans...stand to incur some damage. Nothing, I imagine, compared to the Damage the WREB stakeholders will sustain.

With this sentiment, there has been a petition from students requesting consideration that the current 4th year students at least be exempt from this amendment. I signed it, but with regret for the implicit acceptance in its premise that the amendment, thanks to all its defamation efforts, is going to pass and there is nothing any reasonable soul can do about it.

I write today only because at heart, I still choose to believe that boring old Reason and fact can sometimes slow down the freight train that is propaganda. Not stop it of course. Or even put a dent in it. But just slow it down long enough so that our dignity can at least decide for itself whether or not it wants to be on board.

Thank you for your attention.

Samantha Humke

4th year dental student

University of Iowa

College of Dentistry

## Johnson, Melanie [IDB]

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**From:** Humke, Samantha S [samantha-humke@uiowa.edu]  
**Sent:** Thursday, December 02, 2010 9:39 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** WREB decertification

Ms Johnson,

I just wanted to add that the WREB defamation and libel movement by CRDTS further will bring about DAMAGE to the state of Iowa being limiting the number of equally qualified dentists who might otherwise have considered practicing here.

It has been argued without evidence that this limitation somehow equates to higher standards, but that is simply baseless. If there were any evidence to support the claim, then logical, reasonable people (who do not have a vested interest in a CRDTS monopoly) would take it seriously and stand behind it.

Thank you.  
Samantha Humke  
Dental Student

## Johnson, Melanie [IDB]

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**From:** Martin Halbur [dmmkea@win-4-u.net]  
**Sent:** Saturday, December 04, 2010 9:15 AM  
**To:** Johnson, Melanie [IDB]; Lynn Curry; Steven Bradley; P T Grimes; 'William Strohman DDS'; David Davidson; Dan Kegler; Bruce Cochrane; Dennis Higginbotham; Larry Carl; Mark Jurkovich  
**Subject:** Iowa Dental Board proposed actions

Dear Friends of Dentistry,

I have been following the Iowa Dental Board actions to begin the process of decertifying WREB and ADEX test for licensure in Iowa. I think this is the wrong direction to take in our state. Please give special consideration to the effects this will have for our patient's access especially as we try to recruit dentist to Western Iowa. This will also have a negative effect on potential faculty recruitment for our school. Our American Dental Association has been working toward a universal licensure model and the above actions will move us in the opposite direction. Please do not decertify WREB and AMEX and possibly consider accepting additional test as an alternative.

Thanks for your continued time and efforts for Dentistry in Iowa.

Sincerely,  
Martin J. Halbur DDS

## **Johnson, Melanie [IDB]**

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**From:** Borgwardt, Derek S [derek-borgwardt@uiowa.edu]  
**Sent:** Saturday, December 04, 2010 3:08 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** Clarification regarding the decertification of WREB

Ms. Johnson,

Let me begin by expressing my disbelief and extreme disappointment in the recent decision by the Iowa Dental Board to move towards the decertification of the WREB exam. As a 2008 graduate of the University of Iowa College of Dentistry, I was among the first group of graduates to take the WREB examination hosted at the College of Dentistry, and I would like to clarify exactly how this will affect the recent graduates prior to voicing specific concerns. During the 2007-8 academic year I served as both Senior class co-President and College of Dentistry student body president, and I feel that I have a responsibility to alert as many people as possible who may be unaware that their career plans may be altered.

1. It is my understanding that the decertification applies to INITIAL licensure only, correct? Therefore, graduates from '08, '09, and '10 who took WREB and obtained an Iowa dental license based on those credentials would not be affected by this decision correct?
2. How will this affect recent graduates who are currently enrolled in a post-graduate specialty program? Many of my classmates and others who graduated from '08-'10 decided to pursue specialty training in various areas. For the majority of these programs, a state dental license is not needed, and the majority of residents opt to obtain a "resident license" during their 1-6 years of residency. When these specialists complete their training program, will they not be eligible to obtain licensure Iowa without taking a new licensure exam?

I can speak personally to this issue as I am currently a 3rd year resident in periodontics at the University of Iowa College of Dentistry. While I did decide NOT to get a resident license, and instead did apply, and currently hold, a "real" Iowa dental license, had I decided just to get the resident license it would be an absolute nightmare to have to go back, recruit patients, and take a new licensure exam involving things such as operative dentistry and endodontic treatment that I have not done for years and will never do again, as my practice will be limited to my specialty of periodontics.

I have spoken to many of my friends and classmates who are currently enrolled in various specialty programs throughout the country, all of whom planned to return to Iowa following completion of their programs, and all have adamantly sworn they will not come back if it involves taking another a licensure exam. I strongly urge that if a changes is made to decertify WREB that any recent graduates who successfully completed WREB during any of the years that it was explicitly accepted by the Iowa Dental Board be "grandfathered" to be able to obtain an Iowa dental license. Depriving the citizens of Iowa access to these talented specialists would be a huge disservice.

A follow-up question would be, that if these current specialty residents are not "grandfathered," are they currently eligible to apply for a "real" Iowa dental license ASAP based on their WREB scores to avoid this entire problem?

I appreciate your consideration and clarification of these issues. Please respond as soon as possible so that I may do my best to contact all that may be drastically affected by this decision.

Thank you

-Derek Borgwardt, DDS

**Johnson, Melanie [IDB]**

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**From:** peekendo [peekendo@aol.com]  
**Sent:** Sunday, December 05, 2010 10:50 AM  
**To:** Johnson, Melanie [IDB]  
**Subject:** Dental Board Amendments

Melanie Johnson  
Executive Director  
Iowa Dental Board

Dear Ms. Johnson:

I am writing to comment on the Intended Action to amend Chapter 11, "Licensure to Practice Dentistry or Dental Hygiene," and Chapter 12, "Dental and Dental Hygiene Examinations," Iowa Administrative Code.

I am an Associate Adjunct Professor in the Department of Family Dentistry of the University of Iowa College of Dentistry. I lecture and instruct in clinic with the senior (D4) dental students. I believe that the Intended Action is not in the best interests of the people of Iowa.

The State of Iowa is facing a shortage of dentists due to an aging dental work force. It would be prudent to have as many of our D4 students stay in Iowa as possible. It is hard to attract them to stay here now. Iowa does not have mountains, oceans or warm winters. The students get a very good dental education at Iowa and can practice anywhere in the country. The state needs to attract new dentists, not restrict their ability to obtain licensure. In talking to the D4 students, if Iowa only accepts CRDTS at this late date, they will leave the state and never return.

The State of Iowa could lose most of the class of 2011. It would take years or decades to recover from this Intended Action.

Thank you for your attention in this matter.

Sincerely,

Thomas L. Peek, DDS  
Associate Adjunct Professor  
Family Dentistry  
University of Iowa  
College of Dentistry

**Johnson, Melanie [IDB]**

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**From:** Royce, Joe [LEGIS] [Joe.Royce@legis.state.ia.us]  
**Sent:** Monday, December 06, 2010 9:37 AM  
**To:** Ashworth, John [LEGIS]; Bartz, Merlin [LEGIS]; Benson, Jess [LEGIS]; Braun, Mary [LEGIS]; Conway, Stephen [LEGIS]; Courtney, Thomas [LEGIS]; Courtney, Thomas II; Duster, Michael [LEGIS]; Eichhorn, George (Home); Engel, Catherine [LEGIS]; Frevert, Marcella [LEGIS]; Frevert, Marci (home); Heaton, David [LEGIS]; Hoff, Stephanie [LEGIS]; Horn, Wally [LEGIS]; jsmetcalf@gmail.com; John Kibbie 2; Kibbie, John [LEGIS]; Kozel, Debra [LEGIS]; Lerdal, Susan [LEGIS]; Mandernach, Steven [DIA]; Olson, Tyler; Pollak, John [LEGIS]; Reichert, Nathan [LEGIS]; Seymour, James [LEGIS]; Upmeyer, Linda [LEGIS]  
**Cc:** Johnson, Melanie [IDB]; larry.carl@iowadental.org  
**Subject:** FW: Iowa Dental Board Decertification of WREB  
**Attachments:** Iowa Dental Board 12-1-10 Ltr.pdf

These comments were just received from the U of I and relate to:

11:20 **DENTAL BOARD[650]**  
PUBLIC HEALTH DEPARTMENT[641]"umbrella"

**Joe**

Joe Royce  
Legislative Services Agency  
e-mail: [joe.royce@legis.state.ia.us](mailto:joe.royce@legis.state.ia.us) Tel: 515:281.3084

---

**From:** Saunders, Keith D [<mailto:keith-saunders@uiowa.edu>]  
**Sent:** Monday, December 06, 2010 9:30 AM  
**To:** Royce, Joe [LEGIS]  
**Subject:** Iowa Dental Board Decertification of WREB

Joe:

Thanks for calling this morning regarding the proposed rule change from the Dental Board. Attached, please find the statement prepared by the UI College of Dentistry regarding the proposed change.

If you have any questions or need additional information, please do not hesitate to ask.

Thanks again for the advice and guidance.

Keith

Keith Saunders  
State Relations Officer  
The University of Iowa  
Cell: (319) 240-0007





COLLEGE OF DENTISTRY

**Office of the Dean**

300 Dental Science N  
Iowa City, Iowa 52242-1010  
319-335-9650  
Fax 319-335-7155

December 1, 2010

Melanie Johnson, Executive Director  
Iowa Dental Board  
400 SW 8<sup>th</sup> Street, Suite D  
Des Moines, Iowa 50309-4687

Dear Ms. Johnson:

The Iowa Dental Board's intention to amend Chapter 11, "Applications," and Chapter 12, "Examinations," Iowa Administrative Code to eliminate the Western Regional Examining Board (WREB) and the American Board of Dental Examiners, Inc. (ADEX) from the list of allowable examinations for purposes of licensure is not in the best interest of the people of the State of Iowa.

At a time when the state is facing critical access to dental care issues and an impending shortage of practicing dentists due to the rapidly aging dental workforce, this action to limit access to dental licensure is contrary to reason. In 2009, 40% of the practicing dentists in Iowa were age 55 or older. In addition, in 10 Iowa counties 50% or more of the practicing dentists were age 60 or older. The restriction to a single examination to qualify for licensure limits the ability of Iowa communities to recruit dentists to replace those who retire.

The timing of this proposed change imposes undue hardship on the current fourth-year students at the University of Iowa College of Dentistry. Recognizing the need to schedule the examination schedule well in advance, and with the knowledge that three examinations were accepted by the Board, the College committed to hosting the WREB examination in March of 2011 and informed the students of the date. Many of these students have been preparing for the WREB exam and working to identify patients that meet the criteria for the exam. If the proposed rule change stands, senior students who successfully pass the scheduled WREB examination will not be eligible for licensure in Iowa and will need to look outside the state for practice opportunities.

The rationale for the proposed rule change was identified by the Board as based in the statutory duty to examine dentists sitting for the Board exam. **Iowa Code 147.34** states that "*Each board shall by rule prescribe the examination or examinations required for licensure for the profession and the manner in which an applicant shall complete the examination process. A board may develop and administer the examination, may designate a national, uniform, or other examination as the prescribed examination, or may contract for such services.*" Therefore, Iowa Code would seem to allow multiple regional examinations to qualify for licensure.

There is absolutely no evidence that any of the recognized regional dental examinations are more valid than any other or more predictive of safe practice. Restricting the examinations that are allowable to only the CRDTS examination when three examinations were previously allowed implies that the other examinations (ADEX & WREB) do not perform as well as CRDTS. No evidence has been offered to support such an implication. As a means to attract dentists, surrounding states are choosing to recognize more regional examinations as qualifying for licensure, not fewer. This action puts Iowa at a competitive disadvantage.

Impact of the Proposed Rule Change:

- The timing of the Boards action has caused immeasurable harm to current College of Dentistry senior students who have prepared for the WREB examination in order to practice in Iowa. These students' plans have been clouded with uncertainty and they are being forced to make a decision of which examination to take very late in the process.
- Current Iowa specialty residents who took WREB when they graduated, but did not complete an application for an Iowa license due to ability to practice in their advanced educational program with a resident license, would not be eligible to obtain a license to practice in Iowa unless they took another clinical examination. This would be a serious disincentive for those advanced students to practice in Iowa.
- Graduates from other dental schools who are considering establishing a practice in Iowa but who previously completed WREB or ADEX will now not be eligible for an Iowa license without taking another examination.
- Students from other schools of dentistry who plan on practicing in Iowa, and who believe that Iowa accepts WREB and ADEX for licensure, may take one of these examinations before they become aware that they will not be accepted for licensure. These dentists will likely look elsewhere for practice opportunities. If even one dentist chooses not to practice or is ineligible to practice in Iowa based on this proposed rule change, at least 1500 Iowans will be faced with reduced access to oral health care.

In summary, the College can identify no rational justification for the proposed change in rules and believes that the proposed change will have a negative effect on Iowa's ability to attract dentists to the state and therefore decrease the access to oral health care for Iowans. In addition, adoption of this change will cause irreparable harm to current senior dental students. The College requests that the Board terminate their intended action to restrict the examinations that qualify for Iowa licensure. Further, the College urges the Board to explore alternative ways to provide additional opportunities for dentists to qualify for licensure in Iowa.

Sincerely,



David C. Johnsen, DDS  
Dean

cc: Keith Saunders ✓ 12/1/10  
Director, State Relations  
101 JH

**Johnson, Melanie [IDB]**

---

**From:** Johnson, William T [william-t-johnson@uiowa.edu]  
**Sent:** Tuesday, December 07, 2010 9:50 AM  
**To:** Johnson, Melanie [IDB]  
**Attachments:** Melanie Johnson - Iowa Board of Dental Examiners.doc

Hi Melanie:

It was good to meet you this fall when you visited the college.

Attached is my letter supporting acceptance of multiple regional examinations for Iowa Licensure

Bill



**UNIVERSITY OF  
IOWA COLLEGE OF  
DENTISTRY**

**Be Remarkable**

**William T. Johnson,  
D.D.S., M.S.  
Richard E. Walton  
Professor and Chair,  
Department of  
Endodontics**

**President-Elect,  
American Association  
of Endodontists**

S435 Dental Science Building  
Iowa City, Iowa 52242-1001  
319-335-7471  
Fax 319-335-9663  
[william-t-johnson@uiowa.edu](mailto:william-t-johnson@uiowa.edu)



7 December 2010

Melanie Johnson  
Executive Director  
Iowa Dental Board

Dear Ms. Johnson:

I am writing to express my opinion that the Iowa Dental Board's intention to amend Chapter 11, "Applications," and Chapter 12, "Examinations," Iowa Administrative Code to eliminate the Western Regional Examining Board (WREB) and the American Board of Dental Examiners, Inc, (ADEX) from the list of allowable examinations for purposes of licensure is not in the best interest of the people of the State of Iowa.

It is unfortunate that in this day of evidence based dentistry the Iowa Board of Dental Examiners is making decisions based solely on the authority that the state grants and not on factual information. The scientific and educational literature does not support the reliability or validity of the state and regional clinical examinations as a mechanism to assess competency and to protect the public. For those interested in this topic I have provided references at the conclusion of this letter for review. In addition, the literature does not support one regional examination over another.

As an educator for over thirty years I have observed many changes in teaching methodology examination process. I have served six years as a Director of the American Board of Endodontics (two terms as Secretary and two terms as President) and have a background in national examination and testing. In reviewing the endodontic component of CRDTS I find the exercise to be of limited value. The plastic teeth are unrelated to clinical dentistry and patient care. The color is not realistic, they cut differently than natural teeth, the plastic

melts when heated, radiographs and interpretation absent, and the canals are so large that relatively no preparation is required.

Our students at Iowa are taught with natural extracted teeth in the preclinical laboratory, they complete 4-5 cases (to include a molar) as students in the junior clerkship, and another three to four cases (to include a multi-rooted tooth) as seniors in Family Dentistry. Their clinical experiences also include outcome assessment, vital pulp treatment, and management of urgent/emergent patients.

Not once during their educational experience do they prepare a plastic tooth, yet to receive a license in Iowa they will now be required to perform endodontic procedures on unrealistic models possibly for the first time. This does not sound like a valid and reliable measure of clinical competency. This is in stark contrast to the WREB which uses natural human teeth in the testing process. From an endodontic perspective, the WREB is a more realistic and accurate assessment of the mechanical skills required in the area of endodontics.

As a profession, we need to move past the personal opinions of individuals who may have conflicts of interest and base decisions on the evidence provided in the scientific and educational literature. The state has a variety of educational experts who could provide counsel and guidance to the Board, as does the American Dental Association and the American Dental Education Association. They should be consulted in matters of entry level licensure. By not obtaining professional direction and advice, I believe the Board is failing to provide the leadership expected by the public they are pledged to serve.

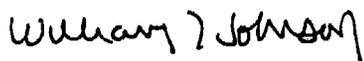
It is my hope that the Iowa Board of Dental Examiners will provide flexibility in the examination process and recognize the major regional clinical tests as acceptable for licensure in Iowa.

#### **References:**

- Hangorsky U. Clinical competency levels of fourth-year dental students as determined by board examiners and faculty members. *J Am Dent Assoc* 1981;102:35-7.
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- Holmes DC, Doering JV, Spector M. Associations among predental credentials and measures of dental school achievement. J Dent Educ 2008; 72(2):142-152.

Sincerely,



William T. Johnson D.D.S.  
Richard E. Walton Professor and Head,  
Department of Endodontics

President-Elect, American Association of Endodontists

**LeROY I. STROHMAN, D.D.S.**

116 NORTH MOORE • ALGONA, IOWA 50511-2730 • Telephone (515) 295-3131

**RECEIVED**

DEC 08 2010

IOWA DENTAL BOARD

December 6, 2010

Ms. Melanie Johnson, Executive Director  
Iowa Dental Board  
400 SW 8<sup>th</sup>. St. Suite D  
Des Moines, Iowa 50309-4687

RE: Decision on November 2, 2010 by the Iowa Dental Board to decertify WREB.

Dear Ms. Johnson,

I write to you with great concern about the impact of this decision upon the future practice of dentistry in the State of Iowa.

I have discussed this matter with Dr. Gary Roth, current Chairman of The Iowa Dental Board, in his phone call to me on November 14, 2010.

There are four dental testing agencies in the United States certified by the American Dental Association. They are reputable, honorable and reliable in their own right, each of them with problems within their jurisdiction. The Iowa Dental Board (formerly known as the Iowa Board of Dental Examiners) decided in year 2000, while I served as Vice Chairman and with much study, to honor for licensure in Iowa the passage of BOTH, the CRDTS and WREB examination.

As a past chairman of the Iowa Board of Dental Examiners and a five year member of the CRDTS steering committee, we enjoyed, at that time, a close and cordial relationship with ALL dental colleges in the CRDTS jurisdiction. We exchanged examiners with WREB and honored their examinations. When I left the board, ADEX (An effort to have a unified examination) entered the picture shortly hereafter. CRDTS experienced management and leadership difficulties, and these two factors led to real problems for the College of Dentistry at the University of Iowa and I might add some other schools as well. Acting under the Code of Iowa, the College of Dentistry offered the WREB examinations to its soon to be graduates and has done so ever since.

I believe it is erroneous to force an applicant for licensure to take only one of the four examinations available to them under the Code of Iowa and deny them licensure after successful passage of any of the other three. It is discriminatory and begs legal resolution to the problem from which no one will benefit. Allow reciprocity of all certified jurisdictions.

In my opinion, created by the Iowa Dental Board, this divisive event has a simple solution.

- A. Continue to accept and honor passage of either CRDTS or WREB in Iowa, by not disturbing ten years of success under the existing Iowa Dental Practice Act within the Code of Iowa.
- B. Encourage CRDTS to upgrade it's credibility with the two dental colleges that left their exam and urge their return to CRDTS.
- C. Consider the idea the applicants themselves can choose which examination they wish to take and the college will honor the majority wishes of the class.
- D. If necessary, encourage the dental colleges to offer both examinations on different dates.

It appears to me that in this power struggle, the applicant for licensure is the forgotten victim. They have spent eight years of their lives and thousands of dollars of their money in a sincere desire to serve humanity. What test they take will NOT make them a better dentist. Indeed, forcing one test and only one test, will seriously aggravate the access to proper dental care in the State of Iowa. This issue will not make us a stronger profession. Let's get this issue resolved and behind us. This decision by the Iowa Dental Board will have a serious impact on the future practice of dentistry in the State of Iowa. It is my hope that the Board will rescind its "Notice of Intended Action" immediately, for the well being of all involved.

Sincerely Submitted,



LeRoy I. Strohman D.D.S.

Cc Mr. Joseph Royce  
Mr. Larry Carl  
Dr. David Johnson  
Dr. Mike Kanellis

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DEC 10 2010

IOWA DENTAL BOARD

Dr. Gary Roth and members of the Iowa Dental Board,

We ask you to please consider moving the decertification of the Western Regional Board Exam (WREB) to August of 2011. Postponing the decertification of the WREB exam would ensure that the University of Iowa College of Dentistry's Class of 2011 would be able to stay in Iowa to practice following graduation. With such little time to prepare, we feel that moving to a later date would ensure that Iowa has a promising new group of dentists to provide Iowan's outstanding dental care well into the future.

As you may be aware, preparation for the licensure exam at The University of Iowa College of Dentistry begins prior to the start of the senior academic school year. When the College of Dentistry has hosted the Central Regional Dental Testing Service (CRDTS) in the past, preparation began in July preceding the fourth year. By not taking action until the late months of 2010 and, further, not having WREB officially be decertified until early 2011, we feel that the Iowa Dental Board has provided us insufficient time to fully prepare for the CRDTS licensure examination. Regardless of what exam will be administered in the following years, we feel that it is unjust to enforce such strong legislation this late in the game. We would like for you, as the Iowa Dental Board, to not place students in the political crossfire and postpone the WREB decertification until August of 2011. This will grandfather all 77 graduating seniors into the WREB examination and afford us the opportunity to stay here in Iowa without placing additional testing and undue stress on our final months of study.

We thank you greatly for your consideration and look forward to working with you in the future.

Best,

University of Iowa College of Dentistry, Class of 2011

(Please see enclosed for signatures)



RYAN WALSH D4 Class Co-President



KEVIN DOW D4 Class Co-President



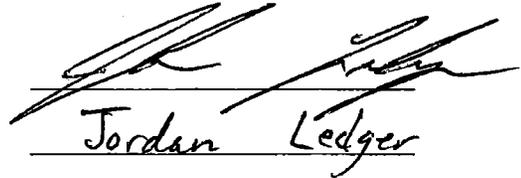
Sean Sherry IASDA President



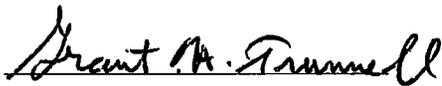
STEVEN NEVILLE



Jordan Pass



Jordan Ledger



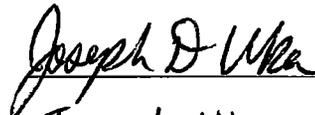
GRANT TRUNNELL



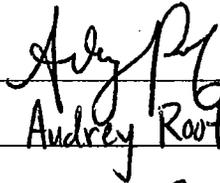
Michael Buck



Krysta Lillard



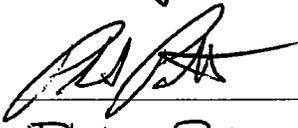
Joseph Uker



Audrey Root



Allijon Hayh



Philip Patten



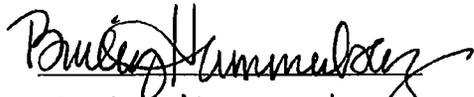
Mark Fischer

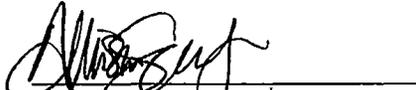


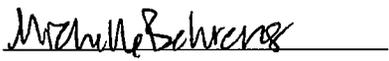
Philip Schmitt



Thomas J. Heidenreich

  
Bailey Hammerberg

  
Allison Schiff

  
Michelle Behrens

  
Linda Giang

  
Cady Negrete

  
LINDSEY COSPER

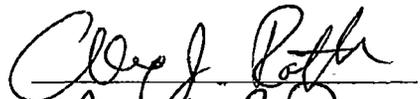
  
Robert J. Thompson

  
Dylan Donnelly

  
Chris Barrett  
D4-Vice President

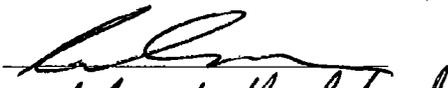
  
Bassel Haddad

  
Paul Carbon

  
Alex J. Roth

  
Maestrace Gibbs

  
Benjamin Plank

  
Majd Haddad

  
Louis Christensen

~~Jeffrey C. Millet~~  
Jeffrey C. Millet

~~Kristy Stetby~~  
Kristina Grate

~~Chris Kingma~~  
Chris Kingma

~~Suzie Ann~~  
Suzie Ann

~~Carole Glerch~~  
Carole Glerch

~~Andrew Mulka~~  
Andrew Mulka

~~Jennifer M. Black~~  
Jennifer M. Black

Lana McDermott  
Lana McDermott

~~Melissa Nensel~~  
Melissa Nensel

~~Treagan White~~  
Treagan White

~~Arelle Betancor~~  
Arelle Betancor

~~Clayton Hoffmann~~  
Clayton Hoffmann

~~Heidi Krab~~  
HEIDI KRAB

~~Mary Kay Caniglis~~  
Mary Kay Caniglis

~~Melina Bean (Melissa Brown)~~  
Aba Mills-Robertson (~~Aba~~)

~~Kristi Ouderkiik-Back~~  
Kristi Ouderkiik-Back



The following students were unable to directly sign the letter due to extramural rotations or interviews. They sent their signatures electronically via email.

Hee Chul Chung

Samantha Humke

Julie Graf

Hatta Clark

Jessica Flanigan

Brandon Botsford

Jason Brown

Cameron Andrew

Jesse Ostby

Abbie Kershner

Paul Lorentson

Christopher Poulsen

Tim Hansen

Debbie Dietrich

**Johnson, Melanie [IDB]**

---

**From:** ecacioppo@aol.com  
**Sent:** Sunday, December 12, 2010 6:19 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** Admin. Code changes  
**Attachments:** IDB.docx

Ms. Johnson:

Please forward to all the sitting board members.  
Eileen Cacioppo, RDH, MS

TO: Iowa Dental Board  
FROM: Eileen Cacioppo, RDH, MS  
SUBJECT: Iowa Administrative Code  
DATE: December 10, 2010

Dear Colleagues:

As a nine year veteran of the Iowa Dental Board and a Central Regional Dental Testing Service examiner I wish to share my thoughts and opinions on the Intended Action on Chapters 11 and 12 of the Iowa Administrative Code.

Over the past several years the IDB has tried to come to an agreement with the University of Iowa Dental College that they return to being the host of the CRDTS examination. Iowa is a member of very, very long standing with CRDTS and has always had full input into the development, maintenance, and administration of this regional exam. We have had sound representation through our very able volunteers from our dental board, many of which have served on the CRDTS Executive Board, the Exam Review Committees, and other committees when needed.

We have carefully evaluated the other regional exams but have found most wanting in critical areas that we felt Iowa licensees required to treat our citizens. After careful consideration we voted to accept the WREB examination along with CRDTS for both dental and dental hygiene licensure three years ago to ease the reciprocity process but we never voted to become a member of that organization. Our IDB members already volunteer huge amounts of time for virtually no compensation and we could not ask them to add additional time, effort, and travel to more states for more meetings and examinations. However, not being a member means Iowa has no vote or input into the conduct of the WREB examination. We continued to be fully involved in the CRDTS examinations, but found the University of Iowa Dental College no longer offering it in our home state!

Our institutions have the academic freedom and educational responsibility to prepare their students in their chosen professions but it is the responsibility of the Iowa Dental Board to examine, test, and then license those applicants to protect the citizens of Iowa. It obviously then is the choice of the IDB to determine who administers and under what auspices those examinations take place.

**I am in favor of the removal of the words "the American Board of Dental Examiners, Inc., (ADEX)" wherever it appears but I am NOT in favor of removal of Western Regional Examining Board, Inc (WREB) from the Code. My observations of the WREB dental hygiene examination has been very positive and I feel it tests those candidates adequately. I would however, offer an amendment to read somewhat as the Nebraska Dental Board decrees that they accept WREB Dental Examination with the passage of CRDTS Prosthetic Examination (since we previously felt this area was not as comprehensive as we would have liked). This would result in the University Dental College having to offer CRDTS to its students and an opportunity for applicants from other states having a place to be examined.**

I know you read and consider all correspondence so I hope you give some serious thought to the previous paragraph.



23460 North 19th Avenue, Suite 210 • Phoenix, Arizona 85027

Phone: 602-944-3315 • Fax: 602-371-8131

www.wreb.org

generalinfo@wreb.org

dentalinfo@wreb.org

hygieneinfo@wreb.org

December 6, 2010

**RECEIVED**

**DEC 13 2010**

**IOWA DENTAL BOARD**

Ms. Melanie Johnson  
Executive Director  
Iowa Dental Board,  
400 SW 8th Street, Suite D,  
Des Moines, Iowa 50309-4687

Dear Ms. Johnson,

I am writing on behalf of the Western Regional Examining Board with regard to the Notice of Intended Action to amend Chapter 11, "Licensure to Practice Dentistry or Dental Hygiene," and Chapter 12, "Dental and Dental Hygiene Examinations," Iowa Administrative Code.

WREB leadership is both surprised and disappointed to learn of the proposed rule change. There is no explanation or apparent justification for this change that has been verbalized to WREB or to the University of Iowa.

The current political climate in the national dental and dental hygiene clinical licensure testing arena is one of expansion of acceptance of the various tests available to challenge dental and dental hygiene candidates. Mutual acceptance, which WREB strongly supports, allows for friendly competition among the testing agencies. We believe that this enhances the performance of all the testing agencies and contributes to everyone's success. In addition, mutual acceptance provides greater choice for candidates, flexibility in their scheduling and enhanced mobility for candidates as well, should they relocate after initial licensure.

It is important for the current members of the Iowa Board to understand how WREB came to examine in Iowa. Initially, we were invited to examine by the school's administration. This is the only avenue WREB pursues to add a new school to their list of examination sites. After the initial examination there, we were invited back because the collegiate administration was comfortable with the format and the candidate friendly nature of our exam. We are delighted to have the opportunity to examine at that site and will continue to do so for 2011. We will also accept an invitation, from the school, to provide the WREB examination in the future in order to accommodate the school and the student's who choose to take WREB for licensure in states that accept the WREB exam.

WREB is very dismayed by this spontaneous and regressive action taken by the state Board of Iowa. The dental schools, candidates and the clinical licensure community collectively will lose if this action to amend is approved.

Thank you for your consideration.

Sincerely,

Members of the WREB Executive Committee

Dr. Bruce Horn, President, Oklahoma

Dr. Paul Stubbs, Immediate Past President, Texas

Carol Price, RDH, Vice President, Montana

Dr Joe Zayas, Secretary, Texas

Dr. Robert Giannini, President-Elect, New Mexico

Dr. Charles Broadbent, Director of Dental Exam Development

Dr. Gerald Woodworth, Director of Dental Exam Administration

Kelly Reich, RDH, Director of Hygiene Exam Development and Administration

Beth Cole, Executive Director

December 8, 2010

Ms. Melanie Johnson  
Iowa Board of Dental Examiners  
400 SW 8<sup>th</sup> Street, Suite D  
Des Moines, IA 50309-4687

**RECEIVED**  
DEC 13 2010  
**IOWA DENTAL BOARD**

Dear Ms. Johnson:

We, as Family Dentistry Adjunct Faculty, are strongly opposed to the rule change proposed by the Iowa Dental Board. This rule change would eliminate Western Regional Examining Board (WREB) and the American Board of Dental Examiners, Inc. (ADEX) from the list of allowable examinations for dental licensure in Iowa and only accept Central Regional Dental Testing Service Inc. (CRDTS).

Family Dentistry adjunct faculty are full-time private practitioners in local communities who teach and work with senior dental students while they treat patients on the clinic floor. Most of us give one day a week from our private practice to benefit the students' educational experience.

This rule change is extremely unfair to our current senior dental students. They have been preparing and gearing up to take the WREB exam since their first year of dental school. The exam is scheduled at a time at the college when all seniors are available which is only 8 days of their final year.

Scheduling CRDTS at short notice is extremely unfair for the following reasons:

1. The students have not had time to prepare for CRDTS. Phasing in a new licensing exam would be less traumatic to all concerned, NOT changing exams in the middle of their final year.
2. The bench/mannequin part of the exam is usually scheduled in October. Now the entire exam (bench and patient) must be completed over one weekend in April.
3. The late scheduling and late notice of scheduling in April, handicaps students that will be on their extramural rotations. Many of these students cannot return to Iowa City in April to take CRDTS.

We, as faculty, have utmost confidence in our students' ability to graduate and practice dentistry. Obtaining a license to practice is part of that process and our students should be prepared to pass any exam. However, passing the exam takes preparation and time over their entire educational experience.

We urge the Iowa Dental Board to withdraw this rule change at this time. We strongly support the class of 2011 in taking the scheduled WREB exam. The Iowa Dental Board should accept WREB, CRDTS, and possibly other exams for Iowa dental licensure.

Sincerely,

Heather B. Heddens

Signed  
Heather B. Heddens

Printed  
Washington, IA.

Practice

Jamie Heying

Signed  
Jamie Heying

Printed

Hiawatha IA

Practice

Richard R. Herzfeldt

Signed  
RICHARD R. HERZFELDT

Printed

Moline, Illinois

Practice

Timothy L. Michels

Signed  
Timothy L. Michels

Printed

Cedar Rapids, Ia

Practice

Jack C. Liu

Signed  
Jack C. Liu

Printed

Cedar Rapids, Ia

Practice

Sara Stiefen

Signed  
Sara Stiefen

Printed

Megan L. Grier

Signed  
Megan L. Grier

Printed

Practice

Ashley L. Charnichael

Signed  
Ashley L. Charnichael

Printed

Waterloo, IA

Practice

Richard R. Sankey

Signed  
RICHARD R. SANKEY

Printed

Mt. Pleasant Iowa

Practice

Gordon F. Goetz

Signed  
GORDON F. GOETZ

Printed

MANCHESTER, IA

Practice

Robert W. Marlin

Signed  
Robert W. Marlin

Printed

Williamsburg, IA

Practice

Chad Stevenson

Signed  
CHAD STEVENSON

Printed

Letter to Iowa Dental Board, December 8, 2010

Amy Stodola  
Signed  
Amy Stodola  
Printed  
Cedar Rapids IA  
Practice

Robert D. Pusey  
Signed  
Robert D. Pusey  
Printed  
Wayland, IA  
Practice

Peter J. Pauly  
Signed  
Peter J. Pauly  
Printed  
Bellevue, Iowa  
Practice

Mark Marz DDS  
Signed  
Mark Marz DDS  
Printed  
Amos IA  
Practice

Dennis R. Rose  
Signed  
Dennis R. Rose  
Printed  
Iowa City, IA  
Practice

John J. Kearney DDS  
Signed  
John J. Kearney DDS  
Printed  
Ames IA  
Practice

Gerald D. Mower  
Signed  
Gerald D. Mower  
Printed  
West Branch, IA  
Practice

Steven P. Anderson  
Signed  
STEVEN P. ANDERSON  
Printed  
DAVENPORT, IOWA  
Practice

Chad Vanourny  
Signed  
Chad Vanourny  
Printed  
West Des Moines, IA  
Practice

Tracy M. Kittrell DDS  
Signed  
Tracy M. Kittrell  
Printed  
Iowa City, IA  
Practice

Michael S. Thomas DDS  
Signed  
Michael S Thomas  
Printed  
Cedar Rapids, IA  
Practice

Arlyn K. Robinson  
Signed  
Arlyn K. Robinson  
Printed  
Cedar Rapids, IA  
Practice

Letter to Iowa Dental Board, December 8, 2010

*Thomas H Ervin D.D.S*

Signed THOMAS H ERVIN

Printed Marion, Iowa

Practice *[Signature]*

Signed Douglas Horker

Printed Cedar Rapids, Iowa

Practice *[Signature]*

Signed Vincent D. Williams

Printed Univ. of Iowa

Practice *[Signature]*

Signed I. Reed Parker

Printed Cedar Rapids, Iowa

Practice *[Signature]*

Signed \_\_\_\_\_

Printed \_\_\_\_\_

Practice \_\_\_\_\_

Signed \_\_\_\_\_

Printed \_\_\_\_\_

Practice \_\_\_\_\_

*[Signature]*

Signed Thomas M. Harris D.D.S

Printed Wasshington IA

Practice \_\_\_\_\_

Signed \_\_\_\_\_

Printed \_\_\_\_\_

Practice \_\_\_\_\_

**Johnson, Melanie [IDB]**

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**From:** Gratz, Kirstina J [kirstina-moreno@uiowa.edu]  
**Sent:** Monday, December 13, 2010 4:45 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** Iowa Dental Board licensing examination letter  
**Attachments:** board\_letter.docx

Melanie Johnson,

Please be sure my comments are heard by the Iowa Dental Board.

Thank you,

-Kirstina Gratz  
[kirstina-moreno@uiowa.edu](mailto:kirstina-moreno@uiowa.edu)

December 13, 2010

Dear Iowa Dental Board,

I would like to write in opposition to the proposed rule amendments concerning clinical examinations. As it is the board's responsibility to decide upon the examination(s) that are accepted for licensure in the state, I would encourage them to *accept all regional licensing exams*. If, as is stated by Dr. Gary Roth "All regional examinations have validity," then it is logical to accept all regional examinations without discrimination. This sends a clear message to all dentists that Iowa is accepting of all dental professionals. Already many counties in Iowa in need a dentist and that incidence will only increase with over 50% of Iowa's dentist over fifty. It would make sense for the Iowa Dental Board to do their part in aiding in this problem, versus sending mixed messages-"you can be a dentist here if you go through additional red tape." If your only concern is public safety, making it more complicated to become a dentist in Iowa is the opposite of what you should be doing for the public's best interest.

Iowa is in need of dentists, you are making it awfully tempting for a graduating senior like me to jump ship and practice in Illinois where they accept the exam that I've been expecting to take. Attracting new professionals to Iowa is equally as important, and a clean sweep of acceptance of all regional dental board examinations may attract (versus deter) new graduates from around the country to Iowa (something I'm sure our legislators would be happy about). I hope that you will make the right decision and be inclusive in your thinking versus exclusive. An inclusive message would return my sense of pride in Iowa as a leader in moving this nation forward in an otherwise stagnant political landscape.

Sincerely,

Kirstina Gratz

Fourth year dental student

**RUTH D. SPIEKER, R.N., D.D.S.  
4782 APPLE VALLEY DRIVE NE  
IOWA CITY, IOWA 52240**

**RECEIVED**  
DEC 16 2010  
IOWA DENTAL BOARD

December 14, 2010

Melanie Johnson, Executive Director  
Iowa Dental Board  
400 SW 8<sup>th</sup> Street, Suite D  
Des Moines, Iowa 50309—4687

Dear Ms. Johnson:

I am writing to commend the Iowa Dental Board's intention to amend Chapter 11, "Applications," and Chapter 12, "Examinations," Iowa Administrative Code, to eliminate the Western Regional Examining Board (WREB) and the American Board of Dental Examiners, Inc. (ADEX) from the list of allowable examinations for purposes of licensure. Dr. Roth's recent comment, "This will make all things right in the universe", is especially demonstrative.

Over the years, I have accumulated a wealth of information to challenge the logic and legality of clinical board exams. These include, but are not limited to, personal experiences as a candidate, observations as a full-time faculty member, ethical considerations, and research correlating examination performance with practice performance. One need only look to other jurisdictions to see there are more effective ways to protect the public *throughout* a dentist's career.

It is my hope that within 10 years, clinical board exams will cease to exist. Your decision to not recognize anyone's exam but your own (and mid-academic year, no less) will certainly add fuel to this debate. I thank you.

Sincerely yours,



Ruth D. Spieker

cc: Keith Saunders, Director State Relations

**Johnson, Melanie [IDB]**

---

**From:** Stephen Thies [srthis@qwestoffice.net]  
**Sent:** Monday, December 20, 2010 4:51 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** notice to decertify WREB

Iowa Dental Board,

Please reconsider the intended action to decertify WREB as an accepted dental examination. The WREB examination is a credible examination and should be accepted as an examination for licensure in Iowa. The University of Iowa, College of Dentistry should be allowed to choose the examination that is offered to its students and to dental applicants. Serious consideration should be given to allow D-4 students an exemption to take the CRDTS examination. Establishing CRDTS as the only accepted examination is restrictive and counter to the national trend of accepting multiple testing entities for licensure.

Thank you,

Dr. Stephen R. Thies

**Johnson, Melanie [IDB]**

---

**From:** Freed, Adam J. [freed@brownwinick.com]  
**Sent:** Monday, December 20, 2010 11:43 AM  
**To:** Johnson, Melanie [IDB]  
**Cc:** Cownie, Catherine C.  
**Subject:** Comments regarding proposed rules  
**Attachments:** Letter to Melanie Johnson re Clinical Examinations (12-20-10).pdf

Ms. Johnson:

Please find attached written comments regarding the Dental Board's proposed rules related to clinical examinations. These comments are being submitted on behalf of the Iowa Dental Association. Please let us know if you have any questions. Thank you.

Adam



**BrownWinick**  
ATTORNEYS AT LAW®

Brown, Winick, Graves, Cross,  
Baskerville and Schoenebaum, P.L.C.

666 Grand Avenue, Suite 2000  
Ruan Center, Des Moines, IA 50309-2510

December 20, 2010

*direct phone: 515-242-2490*

*direct fax: 515-323-8590*

*email: cownie@brownwinick.com*

Melanie Johnson  
Executive Director  
Iowa Dental Board  
400 SW 8<sup>th</sup> Street, Suite D  
Des Moines, Iowa 50309-4687

Re: Proposed rules related to clinical examinations

Dear Ms. Johnson:

This firm serves as counsel to the Iowa Dental Association (the "Association"). It has come to the attention of the Association that the Iowa Dental Board (the "Board") recently proposed rules (the "Proposed Rules") to designate the examination administered by the Central Regional Dental Testing Service, Inc. ("CRDTS") as the only clinical examination that the Board will recognize for purposes of licensure as a dentist in Iowa. The Proposed Rules would remove the examination offered by the Western Regional Examining Board, Inc. ("WREB") and also the examination offered by the American Board of Dental Examiners, Inc. ("ADEX") from the list of allowable examinations. The Association is concerned that the hasty nature of the process that led to the Proposed Rules has resulted in a proposal that would result in unfairness for dental students who intend to practice in Iowa and could impose an additional barrier to high-quality dental care, particularly in rural parts of Iowa. Therefore, the Association opposes the Proposed Rules.

For over eight years, the Board has offered dental students a choice of clinical examinations for purposes of licensure as a dentist in the state of Iowa. Since March 2002, the Board has accepted the examinations offered by both CRDTS and WREB for purpose of licensure as a dentist. Effective on May 31, 2006, the Board added the examination offered by ADEX to the list of approved examinations. By accepting multiple examinations, the Board improved the ability of dental students from other states who may have taken other examinations to achieve licensure in Iowa and to be able to serve otherwise underserved populations in Iowa.

Based on this long history of accepting multiple examinations, dental students have justifiably relied on the availability of the CRDTS, WREB, and ADEX examinations. The Board's last-minute decision to remove WREB and ADEX from the list of approved examinations is unfair to these students and could ultimately impose significant costs on these students since they would

December 20, 2010

Page 2

have to prepare for a different examination. The Proposed Rules would be especially unfair to current D-4 dental students, many of whom have been preparing for the WREB examination for months. The Association is pleased that during the Administrative Rules Review Committee ("ARRC") meeting on December 14, 2010, the Chairman of the Board, Dr. Gary Roth, committed to exempting the current class of D-4 dental students from the Proposed Rules.

During the ARRC meeting, Dr. Roth mentioned several times that the Board's most significant concern regarding the WREB examination is that the Board has no involvement in the administration of the WREB examination. Dr. Roth did not offer any evidence that the WREB examination is insufficient or that it results in licensure of unqualified dentists. Dr. Roth further indicated that the dental boards in a number of states have elected to be involved in multiple examinations. Dr. Roth never indicated whether the Board considered this option or why this would not be a legitimate solution.

The Association is concerned that the process that led to the Proposed Rules has been severely flawed. The Proposed Rules were presented to the members of the Board at the last-minute prior to the Board's telephonic meeting on November 2, 2010, thereby providing very little opportunity for discussion. In addition, all members of the Board were permitted to vote on the issue, despite the requirements of Iowa Code section 147.34, which provides that "[d]entists shall pass an examination approved by a majority of the dentist members of the dental board" (emphasis added). In addition, according to the minutes of that meeting, the proposal presented to the Board only related to removing the WREB examination from the list of approved examinations. The Proposed Rules as noticed in the Administrative Bulletin, however, would also remove the ADEX examination from the list.

The Association is concerned that the Board has so far been unwilling to accommodate the legitimate concerns raised by the Association and the University of Iowa College of Dentistry. For these reasons, the Association requests that the Board withdraw the Proposed Rules from consideration. The Association encourages the Board and its staff to meet with appropriate representatives of the University of Iowa College of Dentistry to resolve this issue expeditiously. If you have any questions regarding this issue, please do not hesitate to contact me.

Very truly yours,



Catherine C. Cownie

CCC:af

**Johnson, Melanie [IDB]**

---

**From:** Kanellis, Michael J [michael-kanellis@uiowa.edu]  
**Sent:** Tuesday, December 21, 2010 12:11 PM  
**To:** Johnson, Melanie [IDB]  
**Subject:** letter to board  
**Attachments:** Kanellis Elvers Letter to Iowa Dental Board.pdf

**Importance:** High

December 21, 2010

Melanie Johnson, Executive Director  
Iowa Dental Board  
400 SW 8<sup>th</sup> St., Suite D  
Des Moines, IA 50309-4687

Dear Ms. Johnson:

Thank you for taking my call earlier today and confirming that in lieu of driving to Des Moines today to make a public statement, I could e-mail you a copy of the statement I wish to submit for public record.

Sincerely,

Michael Kanellis, DDS, MS  
Associate Dean for Patient Care  
The University of Iowa College of Dentistry



**COLLEGE OF DENTISTRY**

**Clinic Administration**

257 Dental Science S  
Iowa City, Iowa 52242-1010  
319-335-7438 Fax 319-335-7155

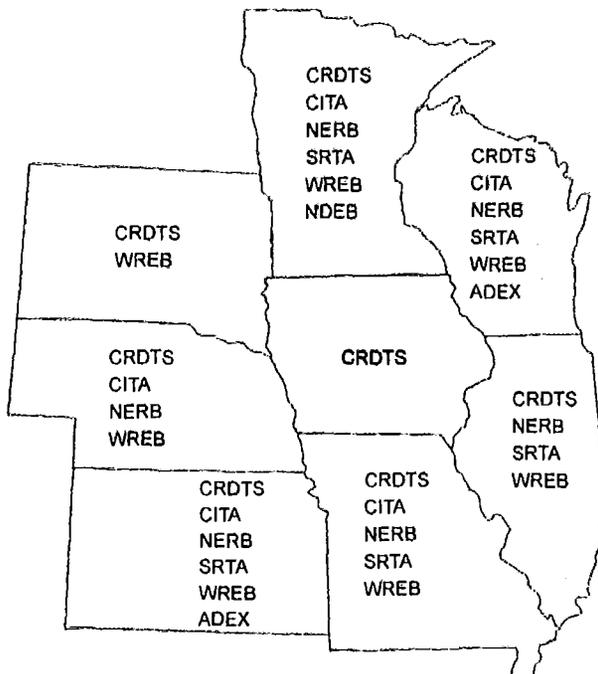
December 21, 2010

Melanie Johnson, Executive Director  
Iowa Dental Board  
400 SW 8<sup>th</sup> Street, Suite D,  
Des Moines, Iowa 50309-4687

Dear Ms. Johnson:

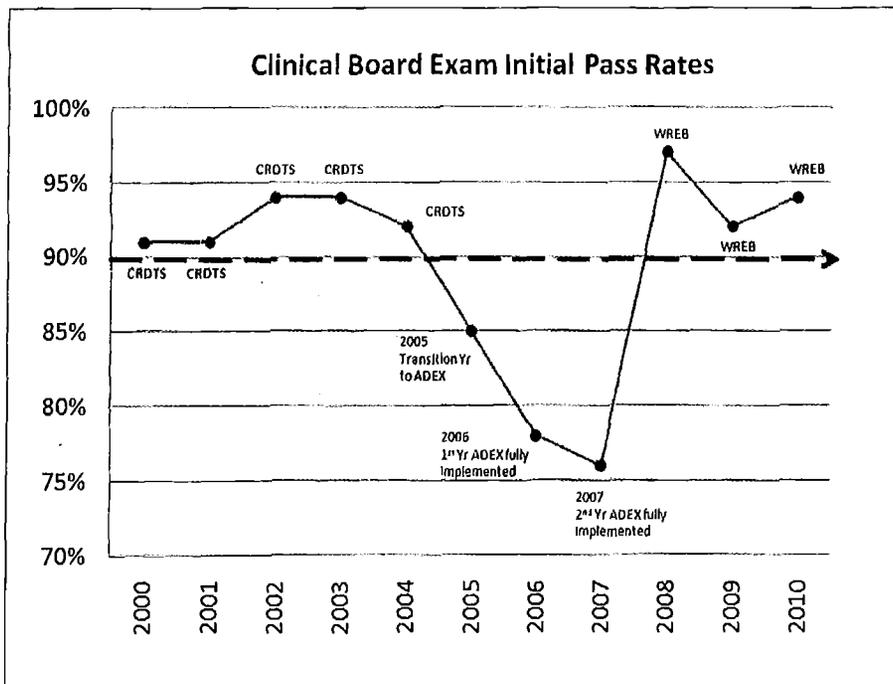
The Iowa Dental Board has recommended a rule change that would decertify the clinical board exams administered by both WREB and ADEX. We are strongly opposed to this recommended action and request that the Iowa Dental Board reconsider and withdraw their recommendation. Our reasons for objecting to the decertification of WREB and ADEX include the following:

1. Limiting the number of clinical board exams accepted for licensure in Iowa is unwise at a time when workforce issues and access to care are of serious concern. The largest cohort of dentists practicing in Iowa is within ten years of retirement. We are badly in need of dentists to take over their practices. Surrounding states have the same concern and have responded by opening their doors to multiple clinical board exams. The Iowa Dental Board's proposed rule change would take Iowa in the opposite direction. If the Iowa Dental Board is successful in decertifying WREB and ADEX, the clinical board exams accepted for licensure in Iowa and the surrounding states will look like the map below.



If we miss out on even a single dentist because of this proposed rule change, the equivalent of 1,500-2,000 fewer lowans will have a dentist.

2. When concerns about access to care have been raised, the leadership of the Iowa Dental Board has acknowledged them, and in several communications has stated that following the decertification of WREB and ADEX they plan to recertify them, but only for graduates of dental schools outside of Iowa. This would create an untenable situation for University of Iowa College of Dentistry graduates. At best it seems unfair, and at worst it appears discriminatory and potentially illegal. This action would create a scenario where an Iowa resident who graduates from dental school at Creighton (for example) would be eligible for licensure in Iowa if they pass WREB, whereas an Iowa resident who graduates from dental school at the University of Iowa would not.
3. To accept only one clinical board exam for licensure in Iowa creates a monopoly that we believe could be detrimental. When the Iowa Dental Board switched their clinical board exam from CRDTS to ADEX in 2005, the College of Dentistry followed suit and our pass rates sharply declined. As you can see in the accompanying chart, Iowa's historically consistent pass rates of 90-plus percent fell to 75 percent over a period of three years.\* The financial and emotional cost to our students was enormous. Fortunately, WREB was also accepted for licensure in Iowa at the time and the College of Dentistry was able to switch the exam we currently host. This resulted in an immediate return to historically acceptable pass rates. Not once during this process was there an outcry from the Iowa Dental Board that ADEX was a flawed exam. Instead, the outcry was against the University of Iowa's College of Dentistry for hosting the WREB exam. If the Iowa Dental Board had accepted only a single clinical board exam for licensure at that time, we could still be in this deleterious situation today.



4. The Iowa Dental Board's primary argument used to justify their proposed rules change is that they have a statutory duty to be involved in the examination process of dental students in Iowa. The language they cite is from Iowa Code 147.34 which states:

*Each board shall by rule prescribe the examination or examinations required for licensure for the profession and the manner in which an applicant shall complete the examination process. A board may develop and administer the examination, may designate a national, uniform, or other examination as the prescribed examination, or may contract for such services.*

We believe the language contained in the Iowa Code allows the Iowa Dental Board considerable latitude in interpreting what their exact role in the examination process is. They seem to have chosen to interpret it in a specific manner in order to justify their desire to decertify WREB and ADEX. While we do acknowledge the Iowa Dental Board's interest in being involved in the board examination process, we believe that decertifying WREB and ADEX is inappropriate and cannot be justified. A simpler and immediate solution for the Iowa Dental Board would be to do what other states have done, and become a member state of WREB, just as they are of CRDTS.

5. Finally, the proposed rule change would create an unfair burden for our current senior dental students who have been preparing for the WREB exam during the past year. We are thankful that the Iowa Dental Board shares this concern, as evidenced by Board Chairman Dr. Gary Roth's promise to exempt the current senior class from the proposed rules, made during his statement to the Administrative Rules Review Committee on December 14, 2010.

Respectfully Submitted,



Michael Kanellis, DDS, MS  
Associate Dean for Patient Care



Ron Elvers, DDS  
Director of Clinics

\* The pass rates cited above are for the initial testing only. Those who fail a section of the exam are required to retake it at a cost of several thousand dollars (\$700-800 for registration plus the cost of transportation, housing and meals for the applicant, patients and dental assistant) and significant stress. It is important to note that with all three exams (CRDTS, ADEX and WREB) our experience has been that essentially 100% of our seniors pass the retake exams with no time or effort directed at remediation between the first and second attempt. Failure on the clinical exam appears to be a random event as we have not been able to find a correlation between student performance in dental school and student performance on the clinical board exams.

# REPORT TO THE DENTAL HYGIENE COMMITTEE

ACTION

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**DATE OF MEETING:** January 25-26, 2011  
**RE:** **Review of Recommendations to CRDTS for DH Examiners**  
**SUBMITTED BY:** Melanie Johnson, Executive Director  
**ACTION REQUESTED:** Identify 2-3 Candidates from List to Recommend to CRDTS

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At the Committee's November 2, 2010 telephonic meeting it ratified the list of eight Iowa dental hygienists submitted to CRDTS for consideration as examiners.

CRDTS recently contacted the Board office and requested that the list be narrowed to 2-3 to start in 2011.

## **Attached for review**

- ❖ Copy of the October 29, 2010 Letter from Johnson to Lippert



# STATE OF IOWA

## IOWA DENTAL BOARD

CHESTER J. CULVER, GOVERNOR  
PATTY JUDGE, LT. GOVERNOR

MELANIE JOHNSON, J.D.  
EXECUTIVE DIRECTOR

October 29, 2010

Dr. Jake Lippert, Executive Director  
Central Regional Dental Testing Service, Inc.  
1725 SW Gage Blvd.  
Topeka, KS 66604-333

RE: Names of Dental Hygienists for CRDTS Examiners

Dear Dr. Lippert,

I received your letter dated September 20, 2010 asking for the names of dental hygienists who would be willing to serve as CRDTS examiners. I provided a copy to the members of the Iowa Dental Board at their October meeting and received a number of names of interested dental hygienists. Below are the names of registered dental hygienists that board records show have been licensed for at least five years, are in good standing with the board, and have no record of disciplinary sanctions:

1. Sandra Leonard, RDH  
Cell phone: 515-710-2216  
Work phone: 515-280-3030  
Address: 710 SE Brentwood Dr.  
Waukee, IA 50263
2. Jill Engbrecht, RDH  
Phone: 641-919-9837  
Address: 204 North 4th St  
Fairfield IA 52556
3. Mary Kelly, RDH  
Phone: 515-255-5048  
Address: 5620 Harwood Drive  
Des Moines, IA 50312
4. Alicia Kucinski, RDH  
Phone: 641-780-3680  
Address: 210 E. 9 St.  
Pella, IA 50219
5. Holly Hunter, RDH  
Phone: 515-229-2882  
Address: 1614 NW College Ave.  
Ankeny, IA 50023

- |                              |   |
|------------------------------|---|
| 6. Crystal M. Evans, RDH     | Cell Phone: 515-402-3705<br>Work Phone: 515-965-4470<br>Address: 4026 66 <sup>th</sup> St.<br>Urbandale, IA 50322 |
| 7. Stephanie Chickering, RDH | Phone: 515-961-0057<br>Address: 1308 North C St.<br>Indianola, IA 50125   |
| 8. Lisa Miller Sroka, RDH    | Phone: 319-351-4204<br>Address: 4391 Red Fox Ct. SW<br>Iowa City, IA 52240-8901                                   |

On behalf of the Iowa Dental Board, thank you for providing us with the opportunity to share the names of several Iowa Registered Dental Hygienists who have indicated an interest in serving as dental hygiene examiners for CRDTS.

Sincerely,



Melanie Johnson, J.D.  
Executive Director