# 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 6/8/2020.

<table>
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<tr>
<th>State</th>
<th>State Details</th>
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<tr>
<td>Alabama</td>
<td>The <a href="https://www.dentalboard.alabama.gov">Board of Dental Examiners</a> now accepts the clinical typodont manikin exams of all of the approved testing agencies through May 31, 2021. The agencies and the required examination components are listed on the Board's dental and dental hygiene license applications.</td>
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<td>Alaska</td>
<td>The Board of Dental Examiners has filed a <a href="https://www.adbe.state.ak.us/52/101/305/05/370/4305/4332/2020">proposed rule</a> change that would repeal the patient based periodontics testing, amend the constructive response testing, and allow for a manikin based examination if taken before December 31, 2020. These regulations are being proposed as a response to the public health emergency declared by the governor March 11, 2020. Comments must be received not later than 4:30 p.m. on June 19, 2020.</td>
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<td>Arizona</td>
<td>Directive for Licensing Boards <a href="https://www.azleg.gov/Legislation/text/2020/2020House/BillDetail.aspx?BillNumber=2020-17">Executive Order 2020-17</a> – Requires a state agency or board that issues licenses to:</td>
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<td>a. Suspend any rules that prevent or limit the amount of online or alternative learning hours permitted to issue or renew a license</td>
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<td>b. Make every attempt to implement electronic or remote format examinations for licensure when feasible</td>
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<td>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.</td>
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<td>i. Provisional licenses are valid for six months</td>
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<td>ii. Provisional licenses will be suspended 20 days after in person testing centers reopen or exams otherwise become available</td>
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<td>d. Applies to Board of Dental Examiners and many other licensing boards</td>
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<td>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.</td>
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<td>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.</td>
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<td></td>
<td>The <a href="https://www.azdentallicensure.com">Arizona State Board of Dental Examiners</a> has also developed an FAQ for prospective licensees.</td>
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<td>California</td>
<td><a href="https://www.dentalboard.ca.gov">The Dental Board of California</a> (Board) will accept, without any further action necessary, the Western Regional Examining Board (WREB) and American Board of Dental Examiners (ADEX) manikin-based examinations for dentist licensure in California.</td>
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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.

Florida Board of Dentistry - For purposes of preparing for, responding to, and mitigating any effect of COVID-19, State Surgeon General Scott A. Rivkees issued Emergency Order 20-008 suspending the provisions of sections 466.006 and 466.007, Florida Statutes, that would prohibit the use of mannequins or simulated patients in lieu of live patients during the administration of the American Dental Licensing Examination and Dental Hygiene Examination. Any statute and/or rule to the contrary is hereby suspended. This suspension applies until September 1, 2020.

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 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.

Illinois Department of Financial and Professional Regulation issued a variance that suspends the requirement of passage of the Periodontal portion of the licensing examination for students completing or graduating from dental colleges or schools in 2020 and taking licensing examinations between the effective date of this Variance and December 31, 2020. Applicants passing the remainder of the examination shall be deemed to meet the requirement to pass the examination in order to be eligible for licensure. After December 31, 2020, applicants must successfully complete all the portions of the licensing examination set forth in Section 1220.120(a) to eligible for licensure.

Iowa Dental Board will grant temporary licenses to dental and dental hygiene applicants. Applicants for either license must: have graduated from a CODA accredited program between March 1, 2020 and September 30, 2020; not previously failed a clinical exam; and submit a completed license application on or before September 30, 2020. Temporary licenses will expire on August 31, 2021 or upon failure of a clinical exam.

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.”

Governor’s Proclamation – Section 13 - “Pursuant to Iowa Code § 29C.6(6), I temporarily suspend the regulatory provisions of Iowa Admin. Code rules 650-1-1.2, 650-11.5, 650-12.1, and 650-12.4 to the extent an applicant is required to complete specific examinations as a
prerequisite for initial licensure as a dentist or dental hygienist, if the dental board determines that the applicant has completed sufficient education and should be granted a temporary license to practice in accordance with any guidance issued by the board. Suspension of these provisions shall extend through the duration of this Proclamation and any future extension of this suspension. I hereby direct the dental board to provide additional guidance to applicants regarding the effect of this suspension, including guidance on obtaining a temporary license.”

### Kansas

**Statement from the Kansas Dental Board**

**Dental Students Graduating in 2020.** At its open public meeting on Friday, April 24, 2020, the Kansas Dental Board approved manikin-based exams for dental students graduating in 2020. All manikin-based clinical exams from all regional testing agencies will be accepted for licensing purposes for 2020 dental graduates only.

**Dental Hygiene Students Graduating in 2020.** At its open public meeting on Friday, April 24, 2020, the Kansas Dental Board approved Objective Structured Clinical Examinations (OSCEs) for dental hygiene students graduating in 2020. All OSCEs from all regional testing agencies will be accepted for licensing purposes for 2020 dental hygiene graduates only.

**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.

### Kentucky

**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.

### Louisiana

**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.

**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.

**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.

### Maine

**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 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
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<th>Section</th>
<th>Michigan 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.</th>
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| Minnesota | **Minnesota Board of Dentistry**

**Dentists** - “The Minnesota Board of Dentistry passed motions on 4/21/2020 and 5/5/2020 to allow Dental students who have passed the written and manikin components of the CDCA’s exam, and will take the CompeDont Tooth component, to apply for licensure, and that the Board will also accept the Central Regional Dental Testing Services (CRDTS) all manikin exam; the Southern Regional Testing Agency (SRTA) manikin-based exam; or the Western Regional Examining Board (WREB) manikin simulation exam. The applicant also needs to comply with the other requirements of the application process.” Only applies to applications for initial licensure received in 2020.

**Dental Hygienists** - “The Minnesota Board of Dentistry passed a motion on 4/21/2020 to allow a Dental Hygiene student to apply for a “conditional license”, if they had not yet passed a board approved clinical exam. The DH applicant would need to have passed the written component of the WREB or CDCA exam to apply for a licensure, with the condition of passing either the WREB or CDCA’s patient or manikin component within six months of the date the license was issued. The applicant also needs to comply with the other requirements of the application process.” Only applies to applications for initial licensure received in 2020.

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<th>Missouri</th>
<th><strong>Emergency Rule</strong> - The Missouri Dental Board issued an emergency rule that creates a limited temporary dental license. The holder of a limited temporary dental license is permitted to practice under the direct supervision of a Missouri licensed dentist. Supervising dentists are required to check the work performed by the limited temporary dental license holder prior to the patient being discharged. A limited temporary dental license is valid for 90 days from the date it is issued. At the completion of the 90 day period, the board may renew a limited temporary dental license for an additional 90 days. A limited temporary dental license shall become void once the holder obtains full licensure or becomes ineligible to take a clinical competency examination.</th>
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<td>New Mexico</td>
<td>The <strong>New Mexico Board of Dental Health</strong> Care has suspended the rules requirement that dental clinical examinations include “periodontal and restorative procedures on patients in a clinical setting” (within 16.5.6.8(C) NMAC). This portion of the rule will not be enforced until 12/31/2020. As a substitute, and until 12/31/2020 for 2020 dental graduates only, the board will accept all portions of the board-approved regional testing service examinations, including a board-approved manikin-based test for restorative and periodontal procedures. WREB CTP satisfies the periodontal requirements.</td>
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<td>North Carolina</td>
<td>The North Carolina Board of Dental Examiners passed an emergency rule allowing temporary limited dental license during the state of emergency. Dentists practicing under a limited temporary dental license must practice under the direct supervision of a licensed dentist.</td>
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**Declaration from the Board of Dental Examiners** - The North Carolina Board of Dental Examiners issued a statement declaring it will temporarily accept the administration of the ADEX clinical exam utilizing the CompDont tooth to satisfy the restorative procedures component of its clinical exam, in addition to accepting the administration of the examination using human subjects. Acceptance of the CompDont exam will remain in effect during the declared state of emergency, unless the Board issues a subsequent order determining that acceptance is no longer necessary to protect the public, health, safety and welfare of the citizens of North Carolina.

**Oklahoma**

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:

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.

The resolution lists the following requirements for applicants seeking a **dental hygiene license** between May 1, 2020 and December 31, 2020:

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.

**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.

**Oregon**

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.
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 Gov. Tom Wolf.

Under the waivers and suspensions issued by Gov. Wolf, the following apply to prospective dentists:

- 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 non-patient-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.

The following waivers and suspensions apply to prospective dental hygienists:

- 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 examination or until a manikin-based clinical examination for hygienists becomes available.

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.”

**South Carolina**

**Statement from the Board of Dentistry - Dental Resident Limited License** - Per development of S.C. Regulation 39-19, effective April 23, 2020, the SC Board of Dentistry will now offer a Dental Resident Limited License. Dental students who have graduated from a CODA-approved dental program and are enrolled to begin a CODA-approved residency program or a Masters’ level clinical degree program at a CODA-accredited dental school, in the year 2020 may apply for the limited license. This license shall allow hospital-based residents to gain licensure so as to obtain hospital privileges necessary to begin their residency programs.

**South Dakota**

**Executive Order 2020-25** – Suspends statutory and regulatory provisions requiring dentists, dental hygienists, and other health care workers to submit proof of completing an examination requirement. Requires dentists and dental hygienists to submit proof of examination by November 30, 2020.

**Tennessee**

**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:
- 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
On May 1, the Texas State Board of Dental Examiners issued a [statement](https://example.com) 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.

### Utah
At its April 17, 2020 meeting, the [Utah Board of Dentistry](https://example.com) 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).

### Virginia
[Virginia Board of Dentistry](https://example.com)

**Dentists** - In addition to live patient clinical examinations, for 2020 only, the Board will accept from dental licensure applicants a clinical dental examination which includes a simulated manikin exercise in restorative dentistry. The Board also decided to waive the scaling exercise with live patients in a 2020 clinical dental examination given by a testing agency accepted by the Board - CITA, CDCA, SRTA, CRDTS and WREB.

**Dental Hygienists** - In addition to live patient clinical examinations, for 2020 only, the Board will accept from dental hygiene licensure applicants a clinical dental hygiene examination which includes a Computer Simulated Clinical Examination (CSCE) or a manikin-based clinical scaling exercise given by a testing agency accepted by the Board - CITA, CDCA, SRTA, CRDTS and WREB.

### Vermont
[HB 742](https://example.com) - 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.

### Washington
At its April 17, 2020 meeting, the [Board of Dentistry](https://example.com) 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.

### West Virginia
The West Virginia Board of Dentistry has issued a [guidance](https://example.com) stating it will issue a provisional license to a 2020 graduate of a dental or dental hygiene program that approved by the Board, who has not completed a clinical board examination and who meets all other requirements set forth in the WV Dental Practice Act, and rules of the Board. Graduates issued a provisional license must complete clinical exams by February 1, 2021. If an individual with a provisional license fails their clinical board, the provisional license will be void until such time the clinical board is passed.
A complete list of exams that will fulfill the requirement for passage of a clinical exam is listed in the guidance. 2020 graduates of dental programs are permitted to complete the periodontics and restorative components of clinical exams in non-patient settings. Board approved non-patient based examinations designed to determine the applicant's level of clinical skills will be accepted for 2020 graduates of dental hygiene programs.

Executive Order No. 31-20 – Suspending 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 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.