



MEMORANDUM

DATE	October 9, 2017
FROM	Sarah Wallace, Assistant Executive Officer Dental Board of California
SUBJECT	Dental Board of California Workshop Relating to the Registered Dental Assistant (RDA) Practical Examination Alternatives

On April 6, 2017, the Dental Board of California (Board) held a special meeting to discuss the findings of the review of the Registered Dental Assistant (RDA) practical examination conducted by the Office of Professional Examination Services (OPES) of the Department of Consumer Affairs (DCA). After reviewing the findings of the report, the Board voted to suspend the administration of the RDA practical examination effective immediately and until July 1, 2017. Pursuant to Business and Professions Code Section 1752.1 at that time, the suspension of the practical examination could only remain in effect until July 1, 2017. After this date, the exam would have been reinstated as a requirement for RDA licensure.

Between April 6 and July 1, 2017, the Board licensed registered dental assistant candidates who had completed all other licensing requirements except passage of the practical exam. Also during this time, the Board sought an author to carry urgency legislation that would continue the suspension of the examination from July 1, 2017 until January 1, 2020, at which time a practical examination or an alternative means of measuring competency would be implemented. This legislation, Assembly Bill 1707 (Chapter 174, Statutes of 2017) authored by Assembly Member Low was signed by Governor Brown and became effective on August 8, 2017.

The Board resumed licensing applicants who have met all other requirements of licensure except passage of the practical examination, including successful completion of the RDA Written Examination and the RDA Law & Ethics Examination.

At its August 2017 meeting, the Board and the Dental Assisting Council (Council) considered a memorandum that was presented by the OPES relating to alternatives for assessing the competency of RDA candidates to perform the clinical procedures necessary for licensure. After the discussion, the Board took action to appoint a subcommittee of the Board to develop alternatives, other than a practical exam, to bring back to the Board and Council for consideration at a future meeting.

The subcommittee, consisting of Bruce Witcher, DDS and Judith Forsythe, RDA, met and developed the attached preliminary subcommittee report regarding alternatives.

The subcommittee will hold a workshop in Sacramento on Friday, October 13, 2017 to provide a forum for discussion regarding the subcommittee's recommendations and to allow interested parties the opportunity to provide verbal and written comments. The discussion and feedback generated from this workshop will be considered by the subcommittee prior to the submission of their final recommendations at a future Board meeting.

No action will be taken during this workshop.

Draft RDA Practical Exam Alternatives Preliminary Subcommittee Report

October 13, 2017 Workshop

For Discussion Only

Background

Assembly Bill (AB) 179 required the Office of Professional Examination Services (OPES) to “conduct a review to determine whether a practical examination is necessary to demonstrate competency of registered dental assistants, and if so, how this examination should be developed and administered.” OPES conducted this review and presented their findings in the April 6, 2016 Exam Review Report and their July 31, 2017 memorandum to the board. In their memorandum OPES recommended that the board immediately suspend the practical exam because it did not accurately measure the competency of registered dental assistants. The board subsequently voted to suspend the exam pending further study of the issue.

AB 1707 (2017) allows the practical exam to remain suspended until January 1, 2020, or until the board determines an alternative way to measure competency, whichever occurs first. Following its August 2017 meeting, the board recommended that a subcommittee consider alternative methods to determine the competency of RDA's and to make recommendations to the board for an alternative to the RDA practical exam.

Alternatives to the RDA Practical Exam

OPES has determined that a revised practical exam would need to be developed in accordance with the 2016 Occupational Analysis and would need substantial changes to meet professional guidelines and technical standards. These changes include standardization of each exam administration and the uniform application of scoring between examiners. Examinations would need to be given at standardized locations with the same candidate spacing, lighting, and head mounts. Psychometric staff would need to attend, train, monitor and evaluate the administration and results of each administration to ensure the development of a reliable, valid and legally defensible exam. In summary, OPES identified serious issues with the existing practical examination process that would require extensive time and resources to implement. In addition, OPES expressed concerns about determining minimum competence for skills that are mastered after licensure and practiced under supervision.

In 2016, OPES conducted an analysis of the RDA profession. This analysis demonstrated that dentist preference dictates the materials used for each procedure in their practice. A practical examination would require candidates to demonstrate proficiency on materials that might not be utilized by the practice in which they are employed. In many cases, the subcommittee came to the conclusion that RDAs would effectively be required to master two sets of skills, one for completion of the practical examination, and the other for use of materials at their place of employment.

OPES also conducted a review of licensure requirements across the country and found that only California and Michigan require candidates to take and pass a practical examination. In a majority of states, licensure eligibility is met through completion of state approved courses, DANB certifications or a CODA approved educational program. Certification of work experience by the supervising dentist is required in approximately 33 states.

OPES suggested the possibility of utilizing an outside testing agency to administer a practical examination, but indicated that this is not the most cost-effective choice for assessing RDA

clinical skills, as this option would most likely increase fees for applicants. An outside testing agency would also face the same difficulties that the DBC has faced in providing a practical examination.

California Law Requires Dentist Supervision of RDAs

OPES's evaluation of possible options for assessing candidate proficiency in performing the RDA clinical skills involved looking at the training and education required for RDA licensure and at the role of the RDA within a dental practice. Current California law states that, "Except as provided in Section 1777, the supervising licensed dentist shall be responsible for determining whether each authorized procedure performed by a registered dental assistant should be performed under general or direct supervision," (B&P Code Section 1752.4(c)).

According to the California Code of Regulations 16 CCR 1086,

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(d) A registered dental assistant may perform the following procedures under the direct supervision of a licensed dentist when done so pursuant to the order, control and full professional responsibility of the supervising dentist. Such procedures shall be checked and approved by the supervising dentist prior to dismissal of the patient from the office of said dentist....

- (4) Place bases and liners on sound dentin;
- (5) Remove excess cement from supragingival surfaces of teeth with a hand instrument or floss;
- (6) Size stainless steel crowns, temporary crowns and bands;
- (7) Fabrication of temporary crowns intra-orally;
- (8) Temporary cementation and removal of temporary crowns and removal of orthodontic bands.

OPES suggested that dentists complete a clinical skills evaluation of the three procedures utilized by the practical examination. The skills evaluation would be provided by the dentist who would sign an affidavit indicating the RDA is competent to perform the procedures previously included in the RDA practical examination. This idea was not well-received at the board meeting. There was concern that dentists would not be motivated to perform this function, and that RDAs might be in an uncomfortable situation waiting for dentists to approve their skills. There was also concern expressed with regard to dentists having different definitions of minimum competence for the RDA skills. In summary, the subcommittee believes that his process could potentially be even more difficult to manage than a practical examination because it would involve a variety of materials and many different practice settings.

After much consideration, the subcommittee came to the following conclusions. A registered dental assistant performs the procedures under the order, control and full professional responsibility of the supervising dentist. These procedures are checked and approved prior to dismissal of the patient from the office. In effect, the dentist certifies that procedures performed by RDAs in their practice are clinically acceptable on a case by case basis; therefore, dentist certification by affidavit would provide little additional public protection.

In the April 2017 report of the RDA Practical examination, OPES indicated that the RDA written examination, along with the fact that RDA duties are supervised by the dentist, places the public at little risk of harm. A practical examination that does not meet psychometric standards would fail to provide additional public protection.

Conclusions and Recommendation

The subcommittee therefore recommends that eligibility for RDA licensure be based on completion of the current educational requirements and passing the RDA written examination. The subcommittee believes that this option provides the most fair and efficient process for RDA licensure, while still protecting the public.

References

Documents reviewed for preparation of this report:

1. May 9, 2016 OPES Memo to Board for May 2016 Meeting
2. 2016 RDA Occupational Analysis
3. April 6, 2017 RDA Practical Exam Review Report
4. July 31, 2017 OPES Memo to Board for August 2017 Meeting