

May 5, 2020

The Honorable Governor Gavin Newsom
Governor of California
1303 10th Street, Suite 1173
Sacramento, CA 95814

RE: REQUEST FOR WAIVERS TO PROVIDE FLEXIBILITY ON REQUIREMENTS FOR
DENTAL HYGIENE STUDENTS

Dear Governor Newsom,

We want to extend our gratitude and appreciation for your leadership during this unexpected crisis of COVID-19.

We are writing this letter to seek your support for Dental Hygiene students in the State of California. With high passion for the profession, we were eager to give back to the community by addressing the shortage of healthcare providers, only to be halted 8 weeks short of graduation without answers as we face difficulties with accreditation.

In the midst of shelter in place (SIP), college campuses are closed until further notice. The Dental Hygiene Class of 2020 faces challenges to satisfy clinical expectations/academic requirements on time for graduation. California Code of Regulations is very specific requiring patient experiences, however we do not have access to a clinical facility and are implementing social distancing thus delaying elective treatment and preventing the completion of this requirement. This not only affects our class, as the following class of 2021 has put their clinical experiences on halt as a result of the lack of accessibility. This can cause a snowball effect into oncoming classes as well.

Schools are transitioning to online/virtual learning for the safety of everyone. However, this is a threat to dental hygiene programs. Our program accreditation is special as it relies on people of the community to fulfill requirements. We would like your sympathy for the hardship we have faced prior to SIP and for you to consider the drastic effects of COVID-19 which impede our ability to maintain reliable academic resources.

A normal semester in the Dental Hygiene program

- We are restricted to a time frame to complete specific/detailed requirements.
- We rely on patients to present to their promised appointment time.
 - Patients come late or cancel/ no show at the very last minute.

- Patients inform students, due to a change in their work schedule they can never come back to complete treatment.
- Patients relocate and can not return mid-treatment.
- It is up to the student to find a replacement to fulfill requirements.
- Typical employment schedules pose difficulties for patients to attend (9am or 1pm appointments Tuesday, Wednesday, Friday).
- Although it is discouraged, many students pay for their patient's treatment in order for their patient to agree to sit as a patient.
- Students approach strangers at the grocery store, gas station, etc. to find specific case difficulty to satisfy requirements.

Outcomes of COVID-19

- Current guidelines request for a delay in elective treatment and for dental offices to be open for emergencies only.
- Due to the fear of this pandemic, patients are unwilling to attend a public facility or high risk locations.
 - Aerosol transmission within dental clinics can remain suspended in the air for 3 hours.
 - No vaccine for COVID-19
 - World-wide shortage of PPE
- Lack of accessibility to academic resources (Clinical facility, patients).

Personal challenges due to the delay of graduation

- Some students do not live locally and their lease is ending in June.
- Most students have taken out personal loans to support full-time student status.
- All students were relying on licensure for a better career opportunity in order to afford the cost of living in California and/or to support their families.

Clinical Assessment Exams (WREB)

- Unethical assessment protocols on live patients; length of treatment is approximately 3-4 hours, the same patient undergoes repeated evaluations by multiple examiners and 1 student before and after treatment.
- WREB has “adjusted exam protocols to adhere to national and state regulations without risking the integrity of the exam or the safety of the candidates, patients, and examiners.”

Our duty as healthcare providers

- To address the prevalence of periodontal diseases and its association with systemic diseases (i.e. cardiovascular, diabetes, adverse pregnancy outcomes, etc.)
- Shortage of dental healthcare providers

- We need to take action to obtain licensure to replace Senior RDH/RDHAP/RDHEF who will enter retirement due to COVID-19.
- Dental preventative care will be in high demand after SIP is lifted.

We seek your support in waiving or granting modifications to California Code of Regulations, 16 CCR section 1105, subdivision (b)(3) and section 1107, subdivision (9)(a)(b)(c). Due to the high risk of COVID-19 transmission and the concern for the health and safety of the public, we are requesting for DHBC to allow temporary flexibility for in person clinical experience and to consider alternative assessment methods. California dental hygiene students seek the same justice granted to California dental students and dental hygiene schools in other states who have been afforded flexibility in order to meet course objectives for licensure.

Sincerely,

California Dental Hygiene Students
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|---|---|
| 1. Phung Tran (Chabot College) | 16. Marissa Reed (San Joaquin Valley College) |
| 2. Janine Boelman (Chabot College) | 17. Hannah Whitten (Shasta Community College) |
| 3. Lynette Fitzsimons (Moreno Valley College) | 18. Marina Anabeza (Chabot College) |
| 4. Patricia Bayaca (Chabot College) | 19. Sophia Zhong (Chabot College) |
| 5. Stefanie Wang (Chabot College) | 20. Adriana Palomares (Chabot College) |
| 6. Foram Patel (Chabot College) | 21. Miguel Ureno (Chabot College) |
| 7. Pont Wong (Chabot College) | 22. Dina Younes (Chabot College) |
| 8. Van Thanh (Chabot College) | 23. My Lieu (Chabot College) |
| 9. Analu Pabico (Chabot College) | 24. Geena Tran (Chabot College) |
| 10. Thao Mai (Chabot College) | 25. Tran Vo (Chabot College) |
| 11. Yonica Felix (Chabot College) | 26. Ebtihal Alowdi (Chabot College) |
| 12. Sonam Lhamo (Chabot College) | 27. Amanda Rogers (Chabot College) |
| 13. Alexis Daniels (Fresno City College) | 28. Yeny Menjivar (Chabot College) |
| 14. Daisy Palafox (Fresno City College) | 29. Faye Solarez (Foothill College) |
| 15. Samuel Leung (Chabot College) | 30. Maira Garcia (Foothill College) |

31. Doris Hong (Foothill College)
32. Jen Shyng (Foothill College)
33. Carlyssa Vogel (Foothill College)
34. Sarah Toothman (Taft College)
35. Nathaniel Galang (Chabot College)
36. Betina Benitez (Foothill College)
37. Han Duong (Chabot College)
38. Iris Gim (Chabot College)
39. Marrysa Reyes (Foothill College)
40. Pirre Blom (Foothill College)
41. Rachel Berry-Huff (Foothill College)
42. Vi Hoang (Chabot College)
43. Cherish Wiebe (Taft College)
44. Biniam G. Brhane (Foothill College)
45. Phuong Nga Ho (Foothill College)
46. Wen Wang (Chabot College)
47. Tharnia Kuch (Foothill College)
48. Marylu Fischel (Foothill College)
49. Farideh Bonakdar (Foothill College)
50. Sarita Patel (Foothill College)
51. Nirmeen Tahir (Foothill College)
52. Huan Pham (Foothill College)
53. Yi Li (Foothill College)

CC: California Community Colleges Chancellor's Office

This page includes a brief list of Chabot College students' clinical accomplishments during this rigorous two year dental hygiene course we would like to share with you.

Students of our program have completed 1,474 hours out of the minimum 1,600 clock hours required by California Code of Regulations, 16 CCR section 1105, subdivision (b)(3). We would like to reassure you that we have been tested for competence through the program, with a score of 75% or more in order to advance. Every student has been exposed to various case difficulties, with minimum clinical requirements in order to advance onto the next semester.

First Semester (Complete)

- Emphasis on infection control and preclinical of instrumentation, radiography and assessment skills.

Second Semester (Complete)

- Preclinical of instrumentation, radiography and assessment skills.
- Minimum of 5 light patients, 6 full mouth x-rays (FMX), 2 panoramic x-rays (PANO)
- Competencies: Probing, Restorative Charting, Oral Hygiene instructions

Third Semester (Complete)

- Preclinical of expanded duties of RDH (LA, STC, Nitrous Oxide Sedation)
- Minimum of case difficulties (7 Light, 6 Moderate, 1 Heavy)
 - Patients are not completed until they are free of detectable calculus, this may take 1 appointment or require patients to return 2, 3 or more times.
- Minimum 1 of each patient experience competency (Pediatric, Adolescent, Adult, Geriatric, Special Needs)
 - This involves research and implementation of science-based evidence specific to each case study
- Minimum of 5 FMX
- 3 Test cases
- Competencies: 4 Arestin, 1 CHX irrigation, 2 Gracey Instrumentation Skill demonstration, Topical anesthesia (Oraqix), dental sealants
- Minimum of 4 soft tissue curettage, with 1 a clinical competency is required by our program
 - This meets California Code of Regulations, 16 CCR section 1107, subdivision (9)(c)

Fourth Semester (Partially Complete)

- Minimum of case difficulties (11 Lights, 9 Moderates, 1 Heavy)

- Minimum 1 of each patient experience competency (Pediatric, Adolescent, Adult, Geriatric, Special Needs)
- Minimum 5 FMX
- 3 Test Case, 1 Mock Board
- Competencies: soft tissue curettage, 4 Arestin, 1 CHX irrigation, 2 Gracey Instrumentation Skill demonstration, Topical anesthesia (Oraqix & Cetacaine), dental sealants

Between the Third and Fourth Semester (Partially complete)

- Minimum of 4 clinical experiences of the maxillary and mandibular injections on patients
 - This meets California Code of Regulations, 16 CCR section 1107, subdivision (9)(a)
- Minimum of 4 Nitrous oxide sedation clinical experience on patients
 - This meets California Code of Regulations, 16 CCR section 1107, subdivision (9)(b)

For your reference:

16 CCR section 1105, subdivision (b)(3) The length of instruction in the educational program shall include two academic years of full time instruction at the postsecondary college level or its equivalent, and a minimum of 1,600 clock hours.

[https://govt.westlaw.com/calregs/Document/I11D6452A8B874FDA8AF0A2D713585A08?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I11D6452A8B874FDA8AF0A2D713585A08?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

16 CCR section 1107, subdivision (9)(a)(b)(c)

(A) Local anesthetic agents curriculum must include at least thirty (30) hours of instruction, including at least fifteen (15) hours of didactic and preclinical instruction and at least fifteen (15) hours of clinical instruction. Preclinical instruction shall include a minimum of two (2) experiences per injection, which may be on another student. Clinical instruction shall include at least four (4) clinical experiences per injection on four different patients, of which only one may be on another student. Curriculum must include maxillary and mandibular anesthesia techniques for local infiltration, field block and nerve block to include anterior superior alveolar (ASA) nerve block (infraorbital), middle superior alveolar nerve block (MSA), anterior middle superior alveolar nerve block (AMSA), posterior superior alveolar nerve block (PSA), greater palatine nerve block, nasopalatine (P-ASA) nerve block, suprapariosteal, inferior alveolar nerve block (to include Gow-Gates technique), lingual nerve block, buccal nerve block, mental nerve block, incisive nerve block and intraseptal injections. One clinical experience per injection shall be used to determine clinical competency in the course. The competency evaluation for each injection and technique must be achieved at a minimum of 75%.

(B) Nitrous oxide-oxygen analgesia curriculum must include at least eight (8) hours of instruction, including at least four (4) hours of didactic and preclinical instruction and at least four (4) hours of clinical instruction. This includes at least two (2) preclinical experiences on patients, both of which may be on another student, and at least three (3) clinical experiences on patients, of which only one may be on another student and one of which will be used to determine clinical competency in the course. Each clinical experience shall include the performance of a dental hygiene procedure while administering at least twenty (20) minutes of nitrous oxide-oxygen analgesia. The competency evaluation must be achieved at a minimum of 75%.

(C) Periodontal soft tissue curettage curriculum must include at least six (6) hours of instruction, including at least three (3) hours of didactic and preclinical instruction and at least three (3) hours of clinical instruction. Education may include use of a laser approved for soft tissue curettage. This includes at least three (3) clinical experiences on patients, of which only one may be on another student and one of which will be used to determine clinical competency in the course. The competency evaluation for this procedure must be achieved at a minimum of 75%.

[https://govt.westlaw.com/calregs/Document/I77146DF42ED646EF9B74857B15317AED?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I77146DF42ED646EF9B74857B15317AED?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))