



MEMORANDUM

DATE	April 22, 2020
TO	Dental Hygiene Educational Program Directors
FROM	Anthony Lum Executive Officer Dental Hygiene Board of California
SUBJECT	DHBC Statement Regarding Program Completion Requirements During the COVID-19 Pandemic

Program Directors:

The Dental Hygiene Board of California (DHBC) has been receiving questions regarding program completion requirements due to campus closures of clinical facilities and alternate educational delivery methods during the COVID-19 pandemic. This is a unique situation, as our profession involves in-person clinical contact as a part of the requirements for dental hygiene educational programs by DHBC, as well as by the Commission on Dental Accreditation (CODA).

On April 14, 2020, CODA issued a notification on “Additional Post-CODA Meeting Guidance on Interruption of Education Related to COVID-19 for the Class of 2020.” In the correspondence, CODA provided this link to a temporary flexibility guidance document for the use of dental hygiene educational programs (“Guidance Document: Temporary Flexibility in Accreditation Standards to Address Interruption of Education Reporting Requirements Resulting From COVID-19 for the Class of 2020” https://www.ada.org/~media/CODA/Files/Dental_Hygiene_Flexibility_4_20.pdf?la=en).

Therefore, if the dental hygiene educational program chooses to apply the discipline-specific temporary flexibility guidance provided by CODA, each dental hygiene educational program has an obligation and responsibility to ensure that the revised assessment and evaluation of students utilizing the temporary flexible standards ensures that those standards do not compromise educational objectives, and that each student is competent prior to graduating the program.

Additionally, CODA recognized and reminded programs that there may be licensure or other credentialing implications as a result of the program’s temporary curricular modifications, which must be considered by the program and institution and are outside of CODA’s purview.

In the California Code of Regulations (CCR), there are two specific educational requirements that have been brought to DHBC’s attention which may pose difficulty with flexibility guidelines:

1. 16 CCR section 1105, subdivision (b)(3) requires the length of instruction in dental hygiene educational programs to be two academic years of fulltime instruction at the postsecondary college level or its equivalent, and a minimum of 1,600 clock hours. This is a link to CCR section 1105:

[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).)

2. 16 CCR section 1107 requires specific experience on clinical patients to complete requirements for education in local anesthesia, nitrous oxide-oxygen analgesia, and periodontal soft tissue curettage.

Here is the link to CCR section 1107:

[https://govt.westlaw.com/calregs/Document/I11D6452A8B874FDA8AF0A2D713585A08?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1.](https://govt.westlaw.com/calregs/Document/I11D6452A8B874FDA8AF0A2D713585A08?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1.)

Furthermore, due to changes in delivery methods to prerequisite courses for entrance into dental hygiene educational programs due to the COVID-19 pandemic, DHBC advises the dental hygiene educational programs to review the regulation for guidance on prerequisite courses found in 16 CCR section 1105, subdivision (f). The link to CCR section 1105 is in number 1 above. Specifically, subdivision (f)(1)(C) requires completion of college-level biomedical science courses, in which each requires a wet laboratory component and advises each dental hygiene educational program to review prerequisite courses of the future applicant for appropriate wet laboratory completion.

As California statutes and regulations do not allow for alteration, the dental hygiene educational programs must take these specific regulations into consideration.

Pursuant to the California Code of Regulations, Title 16, section 1105.3, subdivision (b)(3) requires that any changes that require a report to CODA shall require approval from DHBC. Therefore, please send any change reports required by CODA to DHBC as well.

We've also received the clinical examination information from the Western Regional Examination Board (WREB) that was distributed on April 21, 2020 to the educational programs and are reviewing and researching its content.

At the forefront of DHBC's concerns is the health and safety of the public, as well as the academic success of the dental hygiene educational program's participants. We appreciate your cooperation and patience as we work to support both of these outcomes in this unprecedented time.