

the applicant failed in the applicant's last unsuccessful examination, as specified. (BPC § 1633)

- 6) Establishes requirements for the Licensure by Credential (LBC) pathway and requires applicants to submit proof of an active and unrestricted license issued by another state, district, or territory of the United States to practice dentistry that is not subject to any current or pending disciplinary action such as revocation, suspension, or probation. (BPC § 1635.5(a))
- 7) Requires the Board to review the impact of the LBC pathway on the availability of dentists in California and report to the appropriate policy and fiscal committees of the Legislature, as specified, by January 1, 2008. (BPC § 1635.5(c))
- 8) Requires a holder of a license issued under the LBC pathway before January 1, 2006, who committed to complete the remainder of the five years of clinical practice requirement by a contract either to practice dentistry in a facility or to teach or practice dentistry in an accredited dental education program approved by the Board, to complete only two years of service under the contract in order to fulfill the clinical practice obligation. (BPC § 1635.5(f))
- 9) Requires licensed dentists who wish to perform elective facial cosmetic surgery to possess a permit to perform specified categories of elective facial cosmetic surgical procedures. (BPC § 1638.1)
- 10) Requires the Board to appoint a credentialing committee to review the qualifications of each applicant for a facial cosmetic surgery permit. Requires the committee to make a recommendation to the board on whether to issue or not issue a permit to the applicant upon completion of the review of an applicant. States the permit may be unqualified, entitling the permitholder to perform any facial cosmetic surgical procedure authorized or it may contain limitations if the credentialing committee is not satisfied that the applicant has the training or competence to perform certain classes of procedures, or if the applicant has not requested to be permitted for all procedures authorized by the permit. (BPC § 1638.1(e)(1))
- 11) Establishes the requirements for licensure by the DBC as a registered dental assistant in extended functions (RDAEF), including completing an extended functions postsecondary program approved by the Board that teaches the duties that an RDAEF was allowed to perform pursuant to board regulations prior to January 1, 2010, and a course approved by the Board in the procedures as specified by BPC § 1753.5. (BPC § 1753)
- 12) Authorizes an RDAEF licensed on or after January 1, 2010, to perform additional procedures under direct supervision and pursuant to the order, control, and full professional responsibility of a licensed dentist:
 - a) Perform oral health assessments, including intraoral and extraoral soft tissue evaluations to identify oral lesions, classifying occlusion, performing myofunctional evaluations, and oral cancer screenings as authorized by the supervising dentist.

- b) Perform oral health assessments in school-based, community health project settings under the direction of a dentist, registered dental hygienist, or registered dental hygienist in alternative practice.
- c) Gingival retraction for impression and restorative procedures.
- d) Size and fit endodontic master points and accessory points.
- e) Cement endodontic master points and accessory points.
- f) Perform post, core, and build-up procedures in conjunction with direct and indirect restorations.
- g) Take final impression for permanent indirect restorations.
- h) Take final impressions for tooth-borne removeable prosthesis.
- i) Place, contour, finish, and adjust all direct restorations.
- j) Adjust and adhere all permanent indirect restorations.
- k) Other procedures authorized by regulations adopted by the board.

(BPC § 1753.5(b))

- 13) Defines a dental assistant as an individual who, without a license, may perform basic supportive dental procedures, as defined, under the supervision of a licensed dentist. (BPC § 1750 (a))
- 14) Requires a dental assistant to complete a board-approved course in radiation safety to perform radiographic procedures. (BPC § 1750(f)(3))
- 15) Requires a radiation safety course to have the primary purpose of providing theory, laboratory, and clinical application in radiographic techniques. Establishes criteria for Board approval of a radiation safety course provider. Defines responsibilities of course providers, prerequisites (including completion of a Board-approved infection control course), curriculum, and requirements for students to demonstrate successful completion to the Board. (BPC § 1754.5)

This bill:

- 1) Repeals the requirement to furnish satisfactory evidence of financial responsibility or liability insurance for injuries sustained or claimed to be sustained by a dental patient in the course of the examination as a result of the applicant's actions to establish eligibility to take the license examination.
- 2) Deletes obsolete references to the prior Licensure by Portfolio pathway.

- 3) Provides that if an applicant fails a section of a required examination after three attempts to successfully complete that section, the applicant shall retake the entire examination on subsequent attempts.
- 4) Reorganizes Licensure by Credential applicant requirements to provide documentation of qualifications to sit for an examination for licensure.
- 5) States that each member of the credentialing committee shall serve at the pleasure of the Board, and the board may vote to remove any member of the credentialing committee for continued neglect of duties required by law, incompetence, or unprofessional or dishonorable conduct. Authorizes the Board to convene in closed session to consider evidence relating to removal of a committee member.
- 6) Restores polish and contour existing amalgam restorations to the additional procedures under direct supervision and pursuant to the order, control, and full professional responsibility of a licensed dentist that an RDAEF may perform.
- 7) Codifies radiation safety course requirements from Board regulations.
- 8) Makes numerous technical amendments to the Act.

FISCAL EFFECT: According to the Assembly Committee on Appropriations, the bill will not result in costs to the DBC or the Dental Hygiene Board of California.

COMMENTS:

1. **Purpose.** This bill is sponsored by the Dental Board of California. The Author states, "This legislation, sponsored by the Dental Board of California, contains various technical and substantive cleanup provisions to the Dental Practice Act approved by the Board between November 2024 and February of this year. This bill serves as a comprehensive omnibus vehicle to refine the Business and Professions Code, ensuring statutory language reflects current Board policies, corrects outdated cross-references, and removes expired pathways to licensure. The justification for pursuing this bill now, rather than waiting for the Board's next sunset review in 2028, centers on the need to protect the dental consumers of California with administrative urgency, and legislative efficiency. While "Sunset" bills are most common for traditional substantive and non-substantive changes, waiting for the Board's next Sunset cycle would leave in place several statutory impediments and inconsistencies for effective administration of the Dental Practice Act in California."
2. **Background.**

Dental Board and Sunset Review of Licensing Board and Programs. The DBC is responsible for licensing and regulating dental professionals in California. the DBC licenses an estimated 112,000 dental professionals, of which approximately 43,000 are fully licensed dentists; 46,000 are registered dental assistants (RDAs); and 2,300 are registered dental assistants in extended functions (RDAEFs). The DBC is also responsible for setting the duties and functions of an estimated 50,000 unlicensed dental assistants.

In March 2024, the Senate Business, Professions and Economic Development Committee and the Assembly Committee on Business and Professions (Committees) began their comprehensive sunset review oversight of ten regulatory entities, including the DBC. The Committees conducted two oversight hearings and the Board's sunset extension bill, SB 1453 (Ashby, Chapter 483, Statutes of 2024), enacted policy reforms that were discussed in the Background Paper prepared by Committee staff for the Board.

This bill makes amendments that, with the benefit of hindsight, could have been proposed for inclusion in SB 1453 to carry out the intent of the policy areas being amended. Consequently, the amendments of this bill are not substantive policy changes; rather they are conforming or clarifying amendments to policy areas that were revised by SB 1453.

Licensure by Portfolio Pathway. Licensure by portfolio was an alternative pathway to licensure as a dentist in California, available to applicants since November 2014. Under portfolio licensure requirements, instead of taking a single examination, students built a portfolio of completed clinical experience and clinical competency examinations in six subject areas over the normal course of their clinical training during dental school. The portfolio option gave students in California an alternative to being tested on a live patient over the course of one weekend. The applicant's portfolio was assessed for demonstration of experience and competencies following a letter of good standing signed by the dean of the applicant's dental school. The applicant must also pass Parts I and II of the National Board Written Examinations.

Concerns were raised because California had the distinction of being one of the first states to pursue this method of qualifying for licensure so dentists who obtained their license through the portfolio pathway may face difficulties when seeking reciprocal acknowledgment of qualification by other states. DBC was tasked during the prior sunset review oversight in 2019 with answering whether the process is an effective alternative to conventional examinations. Following the sunset review oversight discussions, DBC requested DCA's Office of Professional Examination Services (OPES) to review the Portfolio Examination for continued use for California licensure of dentists. In its final report on the Portfolio Examination, OPES raised several psychometric issues of concern, which were discussed by the DBC.

OPES recommended that DBC initiate a process to eliminate the Portfolio Examination as a pathway to licensure, a proposal that DBC approved, suggesting amendments to BPC Sections 1632, 1632.5, and 1632.55, and a repeal of BPC Section 1632.1, which were enacted by SB 1454. Subsequent to SB 1454, additional amendments were identified that were necessary to eliminate references and requirements of licensure by portfolio, which are proposed by this bill.

Licensure by Credential (LBC) Pathway. According to DBC, requirements in BPC § 1635.5 for the LBC pathway prompted many questions and complaints from applicants seeking clarification on several aspects of the requirements such as: what qualifies as "otherwise restricted" under the law; minimal practice requirements for licensure; residency credit towards licensure; changes in clinical practice contracts; and what constitutes failure to comply or complete those contracts and the consequences to the underlying license.

The Board recommended amending BPC § 1635.5 to clarify clinical practice work requirements and how much credit residency programs will count towards the total hours required for licensure. The Board also requested adding a requirement for those seeking work credit through a contractual agreement to teach and/or practice dentistry to submit written documentation verifying compliance with the requirement. This would further specify how many hours per week an applicant must work and/or teach under such a contractual agreement.

SB 1454 made significant changes to clarify how many hours would be credited toward meeting clinical practice requirements to qualify for licensure under the LBC pathway. This bill makes technical amendments to this section.

Amendments of June 4, 2026. The Author submitted amendments to remove amendments were approved by inclusion in the Committee's 2026 technical bill, SB 1445 (Committee on Business, Professions and Economic Development) to avoid chaptering out issues. Additionally, this bill contained language to amend infection control training requirements for dental assistants, a topic that is already addressed by SB 1311 (Wahab of 2026), which carries an urgency clause.

3. **Related Legislation.** SB 1311 (Wahab of 2026) makes various conforming changes to existing requirements for unlicensed dental assistants (DAs) to complete an infection control course. This bill contains an urgency provision. *This bill is currently in the Assembly Committee on Business and Professions.*

SB 1445 (Committee on Business, Professions and Economic Development of 2026) makes numerous technical and clarifying statutory updates related to programs within the Department of Consumer Affairs (DCA), including repealing references to portfolio by examination for DBC. *This bill is currently in the Assembly Committee on Business and Professions.*

SB 1453 (Ashby, Chapter 483, Statutes of 2024) extends the Board's operations to January 1, 2029, and makes various technical changes, statutory improvements, and policy reforms in response to issues raised during the Legislature's joint sunset review of the DBC.

4. **Arguments in Support.** The Dental Board of California (sponsor) writes, "This bill consolidates technical, non-controversial, and substantive cleanup items approved by the Board—In public meetings between November 2024 and February 2026—to refine various provisions of the Dental Practice Act (DPA) and ensure statutory language aligns with current regulatory standards and consumer protection needs. While these items are typically addressed during the Sunset Review process, waiting for the Board's next cycle in 2028–2029 would leave in place several statutory impediments and inconsistencies for effective administration of the DPA."

The California Association of Dental Assisting Teachers writes in support, "The dental assisting community, along with key stakeholders, has worked diligently over several years to address infection control standards. We believe the provisions outlined in this bill are practical, well-balanced, and in the best interest of patient safety, the dental workforce, and the public."

The California Dental Assistants Association writes, “Over the past several years, the dental assisting community—working collaboratively with key stakeholders—has made significant efforts to strengthen infection control standards. We believe this bill reflects those efforts, offering practical, well-balanced provisions that prioritize patient safety, support the dental workforce, and serve the broader public interest.”

The California Extended Functions Society notes, “The dental assisting community, along with key stakeholders, has worked diligently over several years to address infection control standards. We believe the provisions outlined in this bill, as a starting point for entry-level dental assistants, to be practical, well-balanced, and in the best interest of patient safety, the dental workforce, and the public.”

SUPPORT AND OPPOSITION:

Support:

California Association of Dental Assisting Teachers
California Dental Assistants Association
California Extended Functions Association
Dental Board of California

Opposition:

None received

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