



Dental Hygiene Board of California Townhall Meeting Minutes

Friday, September 12, 2025, 1:00pm

Please note that the Board conducted the Townhall meeting online through TEAMS.

DHBC Members Present:

Registered Dental Hygienist in Alternative Practice (RDHAP) Member – Michael Long
Public Member – Dr. Julie Elginer

DHBC Staff Present:

Anthony Lum, Executive Officer

Adina A. Pineschi-Petty, Doctor of Dental Surgery (DDS), Education, Legislative, and
Regulatory Specialist

Yuping Lin, Department of Consumer Affairs (DCA) Legal Counsel for the DHBC

Elizabeth Dietzen-Olsen, DCA Regulatory Legal Counsel for the DHBC

1. Introduction and Welcome:

Anthony Lum, Executive Officer (EO) of the Dental Hygiene Board of California (Board), welcomed and thanked those members of the public and interested stakeholders for joining the Townhall meeting.

EO Lum stated the reason he wanted to conduct the townhall meeting was due to Registered Dental Hygienist in Alternative Practice (RDHAP) licensee comments the Board received in both email/letter form and in-person during our Board meetings regarding regulatory language and forms for California Code of Regulations (CCR) Title 16, section 1116 “Mobile Dental Hygiene Clinics; Issuance of Approval” and 16 CCR section 1116.5 “Registered Dental Hygienist in Alternative Practice; Physical Facility Registration.”

He expressed that there needs to be some clarification regarding the proposed regulations prior to the Board’s final review and possible approval to move them forward at the Board’s November 2025, meeting. The goal of this meeting was to obtain stakeholder input so staff may put forth regulations that are easily understood and implemented as regulations provide specific direction for Board staff to implement the provision of broad-based laws the Legislature approved.

Comments received by the Board included the following:

1. Combination form is confusing. (1)

2. The issue of having a license but not practicing could be handled online. (1)
3. Amendments addressing oxygen units for RDHAPs who use portable equipment should instead address all RDHAPs who do not administer local anesthesia or perform soft tissue curettage. (2)
4. Oppose amendment to the removal of “dental hygiene diagnosis” as they may not ethically or legally develop an appropriate dental hygiene care plan without first formulating a dental hygiene diagnosis, as supported by national practice standards. (3)

2. Presentation of Amendments:

Dr. Adina Petty presented the proposed amendments to the attendees.

3. Discussion:

A robust discussion took place with 39 attendees providing input as to clarification of the form, amendments addressing oxygen units for those RDHAPs who do not administer local anesthesia or perform soft tissue curettage, amendments addressing radiology facilities for those RDHAPs who do not provide radiological services, and concern regarding the amendment to remove “dental hygiene diagnosis” and replace with “dental hygiene care plan”.

At the conclusion of the meeting, staff proposed the following substantive changes to the text and forms incorporated by reference:

1. Text for 16 CCR section 1116:
 - a. Subdivision (a)(9): Replace “diagnosis(es)” with “care plan.”
 - b. Subdivision (d)(4): Addition of the language “If an RDHAP administers local anesthesia or performs soft tissue curettage pursuant to 16 CCR section 1118, an RDHAP shall have available” regarding the need for portable emergency oxygen equipment if the RDHAP does not provide local anesthesia.
2. Form (DHBC MDHC-01 (Amended 11/2025):
 - a. Question #11: Addition of a “N/A” box in a third column instead of within the question box for clarity.
 - b. Question #12: Addition of a “N/A” box in a third column instead of within the question box for clarity.
 - c. Question #18: 1) Addition of a statement “*If the RDHAP does not provide radiographic services, check the “N/A” box.”; and 2) addition of a “N/A” box in a third column regarding radiographic equipment if the RDHAP does not provide radiographic services.
 - d. Question 28: 1) Addition of language “If an RDHAP administers local anesthesia or performs soft tissue curettage pursuant to 16 CCR section 1118, does”; 2) addition of a statement “*If registering or renewing an MDHC and the RDHAP does not administer local anesthesia or perform soft tissue curettage pursuant to

16 CCR section 1118, check the “N/A” box.”; and 3) addition of a “N/A” box in a third column.

3. Text for 16 CCR section 1116.5:

- a. Subdivision (a)(7): Replace “diagnosis(es)” with “care plan.”
- b. Subdivision (a)(8): Addition of a statement “A physical facility where services are rendered must be located in a dental health professional shortage area, as certified by the Department of Health Care Access and Information, pursuant to BPC sections 1926, 1926.01, and 1926.05.” provided for clarity to the definition.
- c. Subdivision (c)(3): At the end of the subdivision, addition of the statement “For RDHAPs who only utilize portable equipment and do not maintain a physical facility for patient treatment, (C), (E), and (G) of this subdivision do not apply.”
- d. Subdivision (c)(4): Addition of the language “If an RDHAP administers local anesthesia or performs soft tissue curettage pursuant to 16 CCR section 1118, an RDHAP shall have available” regarding the need for portable emergency oxygen equipment if the RDHAP does not provide local anesthesia.

4. Form DHBC HAPR-01 (Amended 11/2025):

- a. Application Fees Box: Addition of language (underlined) to the description for clarity: “NO FEE FOR REGISTRATION OR RENEWAL OF A PRIMARY PHYSICAL FACILITY OR FOR A PHYSICAL FACILITY TO MAINTAIN PORTABLE EQUIPMENT REGISTRATION.”
- b. Box #4: Rearranged the check boxes and added the following definition for clarity: “PLEASE NOTE: A physical facility is defined in 16 CCR section 1116.5 as a fixed structure in which dental hygiene services are rendered or where portable equipment is maintained.”
- c. “Address of Physical Facility” Box: Added the following statement for clarity “NOTE: At the time of registration, the location shall be located in a dental health professional shortage area, as certified by the Department of Health Care Access and Information, pursuant to BPC sections 1926, 1926.01, and 1926.05. Not applicable to Physical Facility to Maintain Portable Equipment Registration or Renewal.”
- d. Question #11: Addition of a “N/A” box in a third column instead of within the question box for clarity.
- e. Question #12: Addition of a “N/A” box in a third column instead of within the question box for clarity.
- f. Question #18: 1) Addition of the language underlined to the description for clarity: “*Not applicable to Physical Facility to Maintain Portable Equipment Registration or Renewal. If registering or renewing registration of a physical facility to maintain portable equipment check this the “N/A” box 2) Addition of a statement “*If the RDHAP does not provide radiographic services, check the “N/A” box.”; and 3) addition of a “N/A” box in a third column regarding radiographic equipment if the RDHAP does not provide radiographic services.
- g. Question #21: 1) Addition of the language underlined to the description for clarity: “*Not applicable to Physical Facility to Maintain Portable Equipment Registration or Renewal. If registering or renewing registration of a physical facility to maintain

- portable equipment check ~~this~~ the “N/A” box”; and 2) addition of a “N/A” box in a third column regarding access to physical facilities pursuant to the Americans with Disabilities Act of 1990.
- h. Question #23: 1) Addition of the language to the question for clarity: “*Not applicable to Physical Facility to Maintain Portable Equipment Registration or Renewal. If registering or renewing registration of a physical facility to maintain portable equipment check the “N/A” box.”; and 2) addition of a “N/A” box in a third column regarding access to toilet facilities within the physical facilities.
 - i. Question #25: 1) Addition of the language underlined to the description for clarity: “*Not applicable to Physical Facility to Maintain Portable Equipment Registration or Renewal. If registering or renewing registration of a physical facility to maintain portable equipment check ~~this~~ the “N/A” box”; and 2) addition of a “N/A” box in a third column regarding requirements for an automated external defibrillator.
 - j. Question 26: 1) Addition of language “If an RDHAP administers local anesthesia or performs soft tissue curettage pursuant to 16 CCR section 1118, does”; 2) addition of a statement “*If registering or renewing: 1) a Physical Facility to Maintain Portable Equipment; or 2) a Physical Facility and the RDHAP does not administer local anesthesia or perform soft tissue curettage pursuant to 16 CCR section 1118, check the “N/A” box.”; and 3) addition of a “N/A” box in a third column.

These amendments will be presented and discussed at the November regularly scheduled Board meeting.

4. Adjournment:

EO Lum adjourned the Townhall meeting at **3:06 p.m.**