

**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS**  
**Division 11**  
**Article 3**

**DEPARTMENT OF CONSUMER AFFAIRS**

**DENTAL HYGIENE BOARD**

**FINAL STATEMENT OF REASONS**

**Subject Matter of Proposed Regulations:** Faculty to Student Ratio

**Section(s) Affected:** Section 1105 of Title 16 of the California Code of Regulations (CCR).

**Updated Information**

The Informative Digest and Initial Statement of Reasons are included in the rulemaking file and incorporated as though set forth herein.

The information contained therein is updated as follows: No changes have been made to warrant a change to the initial statement of reasons as contained in the original notice for section 1105.

No public hearing was originally set for this proposal, and none was requested. Board staff noticed the proposed rulemaking on January 11, 2024, with a 45-day comment period ending on February 27, 2024. The Board received 66 comments which are summarized below.

The Board reviewed the comments at its March 23, 2024 Full Board meeting. The Board approved the responses to the comments and directed staff to take all steps necessary to complete the rulemaking process.

**Local Mandate**

A mandate is not imposed on local agencies or school districts.

**Consideration of Alternatives**

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be more effective in carrying out the purpose for which it was proposed or would be as effective and less burdensome to affected private persons than the adopted regulations or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. The Board incorporates by reference the alternatives identified in its Initial Statement of Reasons and did not receive any comments that altered its findings.

## **Objections or Recommendations/Responses**

The Board received 66 comments (Comments) during the 45-day comment period on the Board's proposed language of section 1105. Of the 66 letters, 64 were in support of this proposal and came from a variety of current students, past students, and faculty members. One comment raised general concerns, but stated they were neutral on the proposal (Letter A). The remaining comment was initially a letter of support, followed up with an email stating that they were in favor of the 1:6 ratio (Letter NNN). The letters are organized by date received, and below is the summary of all of the comments received along with the Board's responses.

### **A. January 18, 2024 letter from Tooka Zokaie, Sr. Health Policy Analyst, on Behalf of the California Dental Association (CDA).**

#### **Comment A-1 Summary**

Ms. Zokaie states the CDA is concerned with the recommended amendment to 16 CCR section 1105(b)(4), as it could become unaligned with future changes to Commission on Dental Accreditation of the American Dental Association (CODA) Standards. Ms. Zokaie states the amendment could have economic and workforce impacts that would ultimately make dental care less accessible. She states retaining the option of increased faculty-to-student ratios could increase admittance to California dental hygiene programs, bolster the hygiene workforce and, in turn, improve access to dental care.

#### **Comment A-2 Summary**

Ms. Zokaie states as a result of CDA's ongoing discussions with various stakeholders in the dental hygiene community, they acknowledge that many existing educational programs approved by DHBC are experiencing difficulties filling faculty positions, which could be exacerbated by the change in ratios. She also states that should the ratio be raised to one faculty to six students (1:6) from one faculty to five students (1:5), programs will still have the discretion to maintain current ratios for various reasons including clinic chair capacity.

#### **Comment A-3 Summary**

Additionally, Ms. Zokaie states CODA has engaged in stakeholder conversations about increasing DHEP student-to-instructor ratio to equal dental assisting and dental therapy accreditation standards, would increase the ratio from 1:5 to 1:6, and offer parity for all three auxiliary dental professions (except for dental schools, as they do not have required faculty-to-student ratios.)

#### **Comment A-4 Summary**

Ms. Zokaie states no evidence has been found to indicate these recommendations would produce a less prepared dental hygiene professional, but that some evidence has demonstrated that dental practices are being affected by dental assisting and dental

hygiene workforce shortages.

Ms. Zokaie states “In January 2023, a coalition of 16 state dental associations, including CDA, sent a letter to CODA requesting that dental hygiene ratio standards be modified from 1:5 to 1:6 in an attempt to maintain patient safety and address workforce shortages. These ratios ensure appropriate instruction and supervision of students as a critical component to the quality of education and skill development, as well as to ensure protection of the student.”

### **Comment A-5 Summary**

Ms. Zokaie provided “active dentist” and “active dental hygienist” data and stated, “On average, California has two active dentists for every active dental hygienist.” Ms. Zokaie states as California North State’s first cohorts of dental students graduate in 2025 and UOP expands its Pacific Health Collective program in Sacramento, the number of “active dentists” is expected to rise. She states “Conversely, the state’s 29 dental hygiene programs graduated 895 hygienists in 2022, a difference of 261 fewer graduates.”

### **Comment A-6 Summary**

Ms. Zokaie states “While education program ratios will not be the silver bullet for the hygiene workforce shortages faced by increasing numbers of California dentists, CDA respectfully urges DHBC to continue dialogue about this issue moving forward, from both a pipeline and retention perspective.” Additionally, Ms. Zokaie states that by DHBC facilitating stakeholder conversations, the DHBC develops meaningful surveillance markers for monitoring changes in the hygiene workforce, which will help address current market needs and identify when future changes may occur.

### **Comment A-7 Summary**

Ms. Zokaie states “For these reasons, CDA is neutral on the proposed regulatory changes to codify student/teacher ratios in dental hygiene education programs and urges the board to explore meaningful ways to monitor and engage with workforce shortage issues impacting licensees.”

### **Response:**

The Board acknowledges and thanks the CDA for their comments. However, the Board believes that the anticipated benefits of the proposed regulation of establishing the faculty to student ratio in regulation outweigh any of the concerns cited in this letter, and are summarized below.

First, by maintaining the faculty to student ratios currently in place in DHEPs, it will protect the data the Board utilized in their decision to eliminate the clinical board exam in statute, thereby protecting consumer safety in newly licensed RDHs.

Second, by maintaining the faculty to student ratios currently in place in DHEPs,

it provides for adequate supervision of RDH students during preclinical, clinical, and laboratory sessions, thereby protecting the consumer safety during their treatment as patients at DHEPs.

Third, as students of DHEPs are also considered consumers, it protects their right to receive adequate faculty guidance in their quest to gain foundational knowledge to be a well-educated and safe practitioner.

Fourth, by placing the current faculty to student ratios currently in regulation, it places the faculty to student ratios under the purview of the Board, thereby ensuring adequate supervision of RDH students during preclinical, clinical, and laboratory practice should CODA be inclined to change the faculty to student ratio indiscriminately at a future date.

## **B. February 1, 2024 letter from Katherine Kane, BSDH, RDHAP, President, on Behalf of the California Dental Hygienists' Association.**

### **Comment B-1 Summary**

The California Dental Hygienists' Association (CDHA) stated they support amending 16 CCR section 1105 related to "Faculty to Student Ratios."

### **Comment B-2 Summary**

CDHA states "It is crucial that dental hygiene programs continue to graduate clinically competent students. CDHA firmly believes that retaining the current 1:5 faculty-to-student ratio is necessary to protecting consumers." Additionally, CDHA states: "Expanding the ratio to 1:6 will mean students receive less attention, both clinic instructors and students will be more stressed in ensuring competencies are complete, and this will interfere with reinforcing important foundational knowledge."

Furthermore, CDHA states, "Coupled with the recent DHBC Sunset Review Bill that shifts greater responsibility to dental hygiene programs to ensure clinical competency, it is more important than ever for students to receive more faculty guidance than less."

### **Comment B-3 Summary**

CDHA believes that increasing faculty-to-student ratio to 1:6, will have a "backfire effect" on its intended goal of addressing workforce shortages, as students will receive less attention and less student competencies will be completed. They state, "Graduation and licensure will be delayed until students are deemed clinically competent, resulting in less grads entering the workforce in a timely fashion."

CDHA compared the focuses between dental education (finite outcomes) and dental hygiene education (more process-focused), and states dental hygienists have more "time-intensive" tasks which require a lower student to faculty ratio that "make for a consummate dental hygienist." They stated, "increasing the ratio would have a greater effect on the student outcomes, and thus the quality of care a patient receives." CDHA

added “For the sake of students, educators, and especially consumers, CDHA supports amending the regulatory code to retain a 1:5 faculty-to-student ratio in dental hygiene schools.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**C. February 7, 2024 letter from Jenny Nguyen, Student at Cypress College.**

**Comment C-1 Summary**

Ms. Nguyen states she supports amending section 1105 related to “Faculty to Student Ratios.”

Ms. Nguyen states dental hygiene programs are responsible for only allowing clinically competent students to graduate and the current 1:5 faculty-to-student ratio has been established as the appropriate ratio to ensure patient safety.

Ms. Nguyen listed several reasons to maintain the current 1:5 faculty-to-student ratio instead of increasing it to 1:6 including: students will receive less faculty attention; increased stress to faculty and students; students may miss important foundational knowledge; students will be less likely to graduate on time due to competition for faculty attention to complete required competencies for graduation; increased student debt due to increased time in school; fewer consumers will receive timely dental hygiene care; and concerns regarding potential clinical facility spacing.

**Comment C-2 Summary**

Ms. Nguyen states “During clinic sessions, overall safety would be an issue. It would be unsafe to increase the ratio because, with the 1:5 ratio, one instructor is technically overseeing 10 people already. If the ratio were to increase to 1:6, the instructor would have to oversee 12 people. That would be too hectic and stressful, and important details can be missed. The safety of both the student and the patient would be at risk.”

**Comment C-3 Summary**

Ms. Nguyen supports amending 1105 to retain a 1:5 faculty-to-student ratio in dental hygiene schools for the sake of students, educators, and consumers.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**D. February 8, 2024 letter from Michael S. Laflamme, RDH, BA, President, on behalf of the San Francisco Dental Hygiene Society (SFDHS).**

**Comment D-1 Summary**

Mr. Laflamme states: “As the President of the San Francisco Dental Hygiene Society we support our state association, the California Dental Hygienists Association, with regards to their position on supporting the amending of section 1105 of Title 16 of the California Code of Regulations related to ‘Faculty to Student Ratios’.” Additionally, he states “As a clinical instructor in the dental hygiene program at the University of the Pacific, Arthur A. Dugoni School of Dentistry, this support is also personal.”

**Comment D-2 Summary**

Mr. Laflamme also states it is crucial for dental hygiene educational programs to graduate clinically competent students. He states maintaining the current 1:5 faculty-to-student ratio is necessary to protecting consumers. However, if the ratio were to increase to 1:6, he is of the opinion that students will receive less attention and less quality instruction because as a clinical instructor, he is “already stretched thin at the 1:5 ratio.”

**Comment D-3 Summary**

Furthermore, Mr. Laflamme states “Couple this change with the recent DHBC Sunset Review Bill that shifts greater responsibility to dental hygiene programs to ensure clinical competency, it is more important than ever for students to receive more faculty guidance than less. I fear changing this ratio will lead to a higher percentage of students failing the DH National Board examination as well as failing to achieve the necessary clinical skills to practice dental hygiene.”

**Comment D-4 Summary**

Mr. Laflamme states the SFDHS supports amending the regulatory code to retain a 1:5 faculty-to-student ratio in dental hygiene schools for “the sake of students, educators, and especially consumers.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**E. February 8, 2024 letter from Tonette Steeb, RDH, CDA, MSED, Director of Dental Hygiene, Diablo Valley College.**

**Comment E-1 Summary**

Ms. Steeb states as an educator at Diablo Valley College, she supports amending

section 1105 related to “Faculty to Student Ratios.”

### **Comment E-2 Summary**

Ms. Steeb states dental hygiene programs are responsible for only allowing clinically competent students to graduate and the current 1:5 faculty-to-student ratio has been established as the appropriate ratio to ensure patient safety.

### **Comment E-3 Summary**

Ms. Steeb listed several reasons to maintain the current 1:5 faculty-to-student ratio instead of increasing it to 1:6 including: students receive less one-on-one instruction and more time will be wasted in clinic waiting to check in with instructors; both clinic instructors and students, who are already under intense pressure to complete competencies and clinical responsibilities will have a greater potential for issues with mental health; students are more likely to miss important foundational skill development with less faculty as many skills taught involve both people skills and hand skills which rely on solid education and adapting to different situations; and “The decision to eliminate the clinical exam for CA graduates was in part based off data obtained with the 1:5 ratio. We do not have data to support this decision with a 1:6 ratio.”

### **Comment E-4 Summary**

Mr. Steeb states she supports amending the regulatory code to retain a 1:5 faculty-to-student ratio in dental hygiene schools for “the sake of students, educators, and especially consumers.”

### **Response:**

The Board acknowledges and appreciates the support for the regulation.

## **F. February 9, 2024 letter from Mimi Myers, RDH, MEd, Full-Time Faculty at the Fresno City College Dental Hygiene Program.**

### **Comment F-1 Summary**

Ms. Myers states as an educator at Fresno City College Dental Hygiene Program, she supports amending section 1105 related to “Faculty to Student Ratios.”

### **Comment F-2 Summary**

Ms. Meyers states dental hygiene programs are responsible for only allowing clinically competent students to graduate and the current 1:5 faculty-to-student ratio has been established as the appropriate ratio to ensure patient safety.

Ms. Meyers lists several reasons to maintain the current 1:5 faculty-to-student ratio instead of increasing it to 1:6 including: students receive less one-on-one instruction;

both clinic instructors and students, who are already under intense pressure to complete competencies and clinical responsibilities will have more stress; students are more likely to miss important foundational skill development with less faculty as many skills taught involve both people skills and hand skills which rely on solid education and adapting to different situations; students will be less likely to graduate on time due to competition for faculty attention to complete required competencies for graduation; increased student debt due to increased time in school; fewer consumers will receive timely dental hygiene care; and clinical facility spacing concerns.

### **Comment F-3 Summary**

Ms. Meyers states she supports amending the regulatory code to retain a 1:5 faculty-to-student ratio in dental hygiene schools for “the sake of students, educators, and especially consumers.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

### **G. February 10, 2024 letter from Jessica Arjona, CDHA Representative for the Class of 2024, West Los Angeles College.**

#### **Comment G-1 Summary**

Ms. Arjona echoes the sentiment of “Letter F.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

### **H. February 10, 2024 letter from Bruna Rett – Last Semester Dental Hygiene Student at West Los Angeles College.**

#### **Comment H-1 Summary**

Ms. Rett echoes the sentiment of “Letter F.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.



**I. February 10, 2024 letter from Denise Van Holland, Junior Clinic Coordinator at Moreno Valley College.**

**Comment I-1 Summary**

Ms. Van Holland echoes the sentiment of “Letter F. ”

**Comment I-2 Summary**

Ms. Van Holland states “Maintaining 1:5 faculty-to-student ratio is the best method to support the student’s professional development and ensure safety for the patients.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**J. February 11, 2024 letter from Blanca Gonzalez, Student at West Los Angeles College.**

**Comment J-1 Summary**

Ms. Gonzalez echoes the sentiment of “Letter F.”

**Comment J-2 Summary**

Ms. Gonzales states that the dental hygiene program is already intense due to the number of clinical requirements needed to be completed to pass the program. She stated if more students are added to the ratio, there will be added stress placed on the students and instructors which will put patients and clinicians at risk for injury due to students trying to finish competencies much faster in less time due to an increased ratio.

**Comment J-3 Summary**

Ms. Gonzales added “There is already limited time with the current ratio that allows professors to complete a proper one-on-one teaching method because they are rushing to get to the next student.” Furthermore, she states “A changed ratio of 1:6 discriminates against students who suffer from anxiety or any other disorder that already limits their ability to complete requirements in a timely manner. Adding a student to the ratio of one Professor will decrease these students' chances of passing requirements.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**K. February 11, 2024 letter from Jean Kulbeth, RDH, MS, Clinical Faculty at Fresno City College.**

**Comment K-1 Summary**

Ms. Kulbeth echoes the sentiment of “Letter F.”

**Comment K-2 Summary**

Ms. Kulbeth states “As digital programs are incorporated into dental hygiene grading, the time instructors have to actually teach hands-on skills has already been diminished.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**L. February 12, 2024 letter from Lia Doan, Clinic Instructor at Moreno Valley Dental Hygiene Program.**

**Comment L-1 Summary**

Ms. Doan echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**M. February 12, 2024 letter from Dalia Lai, BSDH RDH – Vice President of Administration and Public Relations of the CDHA.**

**Comment M-1 Summary**

Ms. Lai echoes the sentiment of “Letter F.”

**Comment M-2 Summary**

Ms. Lai states “Because the requirement of completing a clinical exam has been removed, it is more important than ever that we do not want to sabotage our faculty’s ability to provide the highest standard of dental hygiene education by increasing their workload, even if it is by one more student.”

Furthermore, Ms. Lai added her personal experience, stating that when her student to faculty ratio was low, her mental health was supported throughout her dental hygiene program. She states, “Mental health, which, as I’m sure you also are aware, is extremely important to pay attention to, particularly for students but for dental healthcare

professionals as well.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**N. February 13, 2024 letter from Linda Brookman, Former Assoc. Professor, Clinical Instructor, and Mobile Hygiene Program Director, University of Southern California Dental School, Dental Hygiene Program.**

**Comment N-1 Summary**

Ms. Brookman states as an educator she supports amending section 1105 related to “Faculty to Student Ratios.

**Comment N-2 Summary**

Ms. Brookman states dental hygiene programs are responsible for only allowing clinically competent students to graduate and the current 1:5 faculty-to-student ratio has been established as the appropriate ratio to ensure patient safety.

**Comment N-3 Summary**

Ms. Brookman lists several reasons to maintain the current 1:5 faculty-to-student ratio instead of increasing it to 1:6 including: students receive less one-on-one instruction and emphasized increased supervision is crucial to oversee students handling sharp instruments in patients’ mouth, as well as ultrasonic scalers and lasers. She states, “In her opinion, after supervising students for 20 years, my wish would be to make the ratio 1:4!”

**Comment N-4 Summary**

Ms. Brookman states both clinic instructors and students, who are already under intense pressure to complete competencies and clinical responsibilities will have more stress; students are more likely to miss important foundational skill development with less faculty as many skills taught involve both people skills and hand skills which rely on solid education and adapting to different situations; students will be less likely to graduate on time due to competition for faculty attention to complete required competencies for graduation; increased student debt due to increased time in school; fewer consumers will receive timely dental hygiene care; and clinical facility spacing concerns.

**Comment N-5 Summary**

Ms. Brookman states “Increasing the number of students an instructor must have in the clinic is wrong for the patients and will add more stress to faculty and students. It would not be fair and would probably lead to faculty quitting, and fewer DHs applying for

instructor positions.” She additionally states she supports amending the regulatory code to retain a 1:5 faculty-to-student ratio in dental hygiene schools for “the sake of students, educators, and especially consumers.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**O. February 13, 2024 letter from Christine Jones, RDH, Dental Hygiene Professor at Sacramento City College.**

**Comment O-1 Summary**

Ms. Jones echoes the sentiment of “Letter F.”

**Comment O-2 Summary**

Ms. Jones states “A 1:6 ratio will result in the need for additional faculty and due to hiring constraints for permanent full-time faculty this decision will result in more adjunct faculty. With part time faculty not holding the same hours calibration meetings will be challenging to conduct. This will result in the possibility of testing standards not being aligned. Since clinical competence is heavily weighted in subjectivity and not a clear black and white path.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**P. February 15, 2024 letter from Leslie Gabbert, Associate Professor, Cabrillo College Dental Hygiene Program.**

**Comment P-1 Summary**

Ms. Gabbert echoes the sentiment of “Letter F.”

**Comment P-2 Summary**

Ms. Gabbert states “We strive as educators to graduate competent clinicians. Keeping the 1 instructor per 5 student ratio is necessary to be able to have one on one support for our students.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**Q. February 15, 2024 letter from Brenda Alvarez, Class President, West Los Angeles College, Dental Hygiene Class of 2024.**

**Comment Q-1 Summary**

Ms. Alvarez states as a student at West Los Angeles College, she supports amending section 1105 related to “Faculty to Student Ratios.”

**Comment Q-2 Summary**

Ms. Alvarez states dental hygiene programs are responsible for only allowing clinically competent students to graduate and the current 1:5 faculty-to-student ratio has been established as the appropriate ratio to ensure patient safety.

Ms. Alvarez states based on her experience as a student, she lists several reasons to maintain the current 1:5 faculty-to-student ratio instead of increasing it to 1:6 including: students will receive less faculty guidance and support; increased stress on students and faculty due to reduced time the faculty has to spend with students and providing feedback during those clinical sessions; provided feedback is imperative to educating students on areas in need of improvement; and by increasing the faculty to student ratio, limits time to complete necessary program requirements, leading to possible delays to successfully complete the program.

**Comment Q-3 Summary**

Ms. Alvarez states she supports amending the regulatory code to retain a 1:5 faculty-to-student ratio in dental hygiene schools for the “sake of students, educators, and most importantly, community patients who volunteer their time to assist the students with requirements in return for free preventative services (often due to the lack of dental benefits)”.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**R. February 15, 2024 letter from Andrea Grammatica, Professor, Cerritos College Dental Hygiene Department.**

**Comment R-1 Summary**

Ms. Grammatica states that as a College Professor at Cerritos College in the Dental Hygiene Department, she supports amending section 1105 related to “Faculty to Student Ratios.”

**Comment R-2 Summary**

Ms. Grammatica states that Dental Hygiene programs are responsible for graduating only clinically competent students. She states it is “MORE important now that our current graduates will not be required to take a CA Clinical Board exam to be licensed in CA.” She states her preference would be a 1:4 faculty to student ratio as students today “are not of the same caliber that they were even 10 years ago.”

### **Comment R-3 Summary**

Ms. Grammatica states that if the faculty to student ratio was expanded to 1:6, students would have less faculty interaction, less patient access, and faculty would not be able to complete all required student skill “check-offs.” She states “soft skill” learning (e.g., communication and patient education) as well as “hands-on” learning (e.g., scaling of teeth, local anesthesia, etc.) will be reduced if higher ratios are put in place.

### **Comment R-4 Summary**

Ms. Grammatica states students will not be able to complete requirements, leading to delayed graduation dates and licensure. Additionally, she states the 1:6 ratio is suggested by California dentists wanting more graduates so they have more pay bargaining power. She states today’s dental hygienists are not settling for working in offices that don’t provide fair wages, ethical work environment, or good instruments, and dentists are losing employees. Ms. Grammatica states changing to a 1:6 ratio will not change this or increase graduates. She states COVID, among other reasons, have changed the way dental hygienists value themselves.

### **Comment R-5 Summary**

Ms. Grammatica states students and their learning environment is important to her, as well as she wants the best for her students so they will do the best for their patients. She states she is in support of maintain the 1:5 ratio and if that ratio changes to 1:6. Many faculty will leave the workforce. Ms. Grammatica states that we do not want to sacrifice our students’ learning experience and that is what changing to a 1:6 ratio will do. She states, “There is no advantage to faculty, students, programs, or to California patients for this change of ratio.”

### **Comment R-6 Summary**

Ms. Grammatica asks the Board to “do the right thing and for the sake of everyone” amend the regulatory code to retain the 1:5 faculty to student ratio in dental hygiene schools.

### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**S. February 15, 2024 letter from Dr. Vickie Kimbrough, Director Dental Hygiene, Taft College.**

**Comment S-1 Summary**

Dr. Kimbrough echoes the sentiment of “Letter F.”

**Comment S-2 Summary**

Dr. Kimbrough states the elimination of the clinical board examination for California graduates was based on, and supported by, the 1:5 ratio and therefore, research shows the 1:5 ratio is best for dental hygiene education as well as consumer safety.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**T. February 15, 2024 letter from Kendra Contreras, Program Co-Director at Cypress College Dental Hygiene Program.**

**Comment T-1 Summary**

Ms. Contreras echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**U. February 15, 2024 letter from Teaghan Newbold, Dental Hygiene Student at Sacramento City College.**

**Comment U-1 Summary**

Ms. Newbold echoes the sentiment of “Letter F.”

**Comment U-2 Summary**

Ms. Newbold states the 1:6 ratio would make it very difficult for students and teachers to work together effectively, and can't imagine having a 1:6 ratio when time is important. She states, “Teaching and learning are the most important parts of clinical experiences and that will not be happening at the level that it should be.” Additionally, Ms. Newbold states by possibly overworking staff, this may poses a dangerous scenario. She states, “Teachers cannot be tired, stressed, or too busy to be aware of the patients and their safety.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**V. February 15, 2024 letter from Isabela Hudani, Dental Hygiene Student at West Los Angeles College.**

**Comment V-1 Summary**

Ms. Hudani states as a student at West Los Angeles College, she supports amending section 1105 related to “Faculty to Student Ratios.” She states during clinic, she is often waiting in line to start patient treatment, and doesn’t want her patients to wait even longer. Ms. Hudani also states that most of their clinics have 5 chairs or less, and if there were an extra clinician, there would be an increased sense of competition.

**Comment V-2 Summary**

Ms. Hudani states she believes that a 1:6 ratio only serves to pay their instructors less for more work and reduces their learning opportunities, and wishes the ratio could be 2:5. She states she supports amending the regulatory code to retain a 1:5 faculty-to-student ratio in dental hygiene schools.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**W. February 14, 2024 (received February 16, 2024) letter from Diane M Loera, RDH, MA, Director at the Cerritos College Dental Hygiene Educational Program.**

**Comment W-1 Summary**

Ms. Loera echoes the sentiment of “Letter F.”

**Comment W-2 Summary**

Ms. Loera states a smaller faculty to student ratio of 1:5 allows for more personalized and individualized attention. She states, “Each student can receive tailored support and guidance, addressing their unique needs, strengths, and challenges.”

**Comment W-3 Summary**

Ms. Loera states the impact of the COVID-19 pandemic and learning interruptions may have resulted in varying levels of understanding among students. She states, “A smaller ratio enables educators to identify and address learning gaps more effectively.” Ms.



Loera states the COVID-19 pandemic additionally increased stress and mental health concerns and that a smaller faculty to student ratio “allows educators to better monitor and support the well-being of each student, providing necessary assistance and resources.” She states that students progress at different rates, and a smaller ratio allows faculty to adapt their teaching methods to accommodate diverse learning styles and speeds.

#### **Comment W-4 Summary**

Ms. Loera states, “Research suggests that smaller class sizes positively impact academic performance.” She states that due to the uncertainties of post-COVID education, a 1:5 ratio prepares students for the future by “providing them with a strong educational foundation and the necessary skills to navigate an evolving world.” Additionally, Ms. Loera states as the caliber of students today has changed, faculty need to tend to the mental health and well-being of students. She states faculty need to play a more active role in recognizing signs of distress, providing support, and directing students to appropriate resources.

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

#### **X. February 16, 2024 letter from Marie Benson, Cerritos College Dental Hygiene Faculty.**

#### **Comment X-1 Summary**

Ms. Benson echoes the sentiment of “Letter F.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

#### **Y. February 16, 2024 letter from Karen Andrews RDH, MA, Associate Professor, West Coast University.**

#### **Comment Y-1 Summary**

Ms. Andrews echoes the sentiment of “Letter F.”

#### **Comment Y-2 Summary**

Ms. Andrews states as she is an instructor in clinic, she is most productive with a 1 to 4 ratio, as it gives her ample time with each student. She adds at times with the 1-5 ratio, students aren’t able to receive individualized attention, which causes her stress and students must wait for extended amounts of time. She states, “I can’t imagine a 1-6

ratio!”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**Z. February 16, 2024 letter from Erica Abrajan, Student at Cabrillo College.**

**Comment Z-1 Summary**

Ms. Abrajan echoes the sentiment of “Letter F.”

**Comment Z-2 Summary**

Ms. Abrajan states being a student she already encounters less time with the instructor in clinic. She states by adding a 1:6 ratio, she would have even less time with the instructor which would not benefit her education.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**AA. February 16, 2024 letter from Darcy Simms, Dental Hygiene Student, Concorde Career College, San Bernardino, CA.**

**Comment AA-1 Summary**

Ms. Simms echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**BB. February 17, 2024 letter from Kelly Donovan, Ed.D., MAEd., RDH.**

**Comment BB-1 Summary**

Dr. Donovan echoes the sentiment of “Letter F.”

**Comment BB-2 Summary**

Dr. Donovan states she served in dental hygiene education for two decades as a faculty member, clinical coordinator, and program director, and understands the stress she feels when her attention is divided among five students requiring anesthesia supervision, instrumentation assistance, or skill observations at the same time. She

states, “As good as a faculty member can be in time management, it is virtually impossible to give adequate supervision and direction to more than five students.” Dr. Donovan further states “students and, ultimately, patients suffer when the students do not receive the attention they deserve.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**CC. February 17, 2024 letter from Damariz Reyes-Guillen, Student at Concorde Career College – San Bernardino.**

**Comment CC-1 Summary**

Ms. Reyes-Guillen echoes the sentiment of “Letter F.”

**Comment CC-2 Summary**

Ms. Reyes-Guillen states the 1:5 ratio already seems high and can’t imagine having more students to an instructor. She states if the ratio should be changed, it should be changed to 1:4. Ms. Reyes-Guillen states changing the ratio to more students would not be beneficial for anyone involved, including for patient care.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**DD. February 18, 2024 letter from Pamela Powers RDH MS, Full Time Instructor and 2nd Year Clinic Coordinator at Diablo Valley College.**

**Comment DD-1 Summary**

Ms. Powers echoes the sentiment of “Letter F.”

**Comment DD-2 Summary**

Ms. Powers states a 1:6 ratio removes one faculty member from the clinic floor. She states this would be a “win” for the Administration of the College to save on salaries, but not for the clinical floor faculty nor the Program.

**Comment DD-3 Summary**

Ms. Powers states clinical faculty need time to sit chairside with each student to teach one-on-one skills, and by reducing this one-on-one time, it will impact skill levels, confidence, and possibly increase patient risk.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**EE. February 18, 2024 letter from Sonia Cervantes, RDH, Graduate of Taft College Dental Hygiene Educational Program.**

**Comment EE-1 Summary**

Ms. Cervantes echoes the sentiment of “Letter F.”

**Comment EE-2 Summary**

Ms. Cervantes states there were few students in her class that did not graduate on time due to lack of having clinical competencies checked off. She stated by expanding the ratio to 1:6 will only lead to students to “fight” for the attention of faculty members in order to complete clinical competency checklists.

Ms. Cervantes requested to not make students compete for instructor time as the dental hygiene program was difficult enough on its own. She states, “The safety of patients and students should always come first, and cutting staff will only put those things in danger.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**FF. February 19, 2024 letter from Patti Chan, RDH, MS, Program Director and 2nd Year Clinic Coordinator, Foothill College.**

**Comment FF-1 Summary**

Ms. Chan echoes the sentiment of “Letter F.”

**Comment FF-2 Summary**

Ms. Chan states the current generation of dental hygiene students need more one-on-one instruction than with previous classes. She states having more faculty in the clinics is critical to the success of the students and preparing them for the workforce.

Ms. Chan expressed If the ratios are increased, there may be more attrition from programs which would affect the number of students graduating. She states this will have a negative impact on the number of dental hygienists entering the workforce, leading to fewer consumers receiving dental hygiene care in a timely manner.

### **Comment FF-3 Summary**

Ms. Chan states increasing faculty to student ratios will increase the burden on already overworked dental hygiene educators, leading to increased burn out among educators.

Ms. Chan states the “cost of the programs (i.e., the number of faculty) is not the problem leading to the shortages in dental hygienists in the workforce. To attract people to the field of dental hygiene, dental employers need to offer better benefits and salaries which are competitive and exceed the cost of living in areas of shortages.” She states offering incentives to potential students through scholarships or loan forgiveness programs may also help to address the need for more licensed dental healthcare providers.

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

### **GG. February 20, 2024 letter from Ciara Hill, RDH Student at Concorde Career College-Garden Grove.**

#### **Comment GG-1 Summary**

Ms. Hill echoes the sentiment of “Letter F.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

### **HH. February 21, 2024 letter from Irena Petrie.**

#### **Comment HH-1 Summary**

Ms. Petrie states as a dental hygiene educator with 4 years' experience and 27 years' experience in clinical practice, she agrees with the DHBC in establishing language to maintain a 1:5 faculty to student ratio in clinical settings. She states it is extremely important to maintain the 1:5 ratio for the benefit of the students and the public they serve.

#### **Comment HH-2 Summary**

Ms. Petrie states she has reviewed Standard 2 from CODA, where language specifically and repeatedly states, "clinical instruction, clinical evaluation, and students' demonstration of competencies" and states all require supervision by a clinical instructor. She states evaluation of a student demonstrating competence occurs with individual interaction between clinical instructor and student, and in the clinical setting,

instruction is individualized for each student depending on the situation. Ms. Petrie states Increasing the faculty to student ratio would only reduce the amount of clinical instruction opportunities for faculty to interact with each student.

Furthermore, Ms. Petrie reports Section 3 of the CODA Standards states, "that faculty are responsible for both ensuring that the clinical and radiographic services delivered by students meet current standards for dental hygiene care and for the instruction and evaluation of students during their performance of those services." She states faculty are the most knowledgeable in the process of teaching students in a clinical setting and any consideration of increasing the ratio would only decrease the amount of time an instructor has to evaluate and give instruction to each student. She states, "I believe that the DHBC's proposal to establish a ratio of 5:1 reinforces the board's commitment to the profession through strong education policy and practice."

### **Comment HH-3 Summary**

Ms. Petrie states that as an educator in a clinical setting, she recognizes her responsibility to ensure the safety of the students and of the public. She states she would like to see the DHBC also recognize the importance of safety by establishing the language to protect the 1:5 ratio. Ms. Petrie additionally states that CODA clearly states the "faculty to student ratio must be sufficient to ensure the development of competence and ensure the health and safety of the public." and that dental hygiene programs in California will be better enabled to ensure competence of the students and the safety of students and patients (by maintaining the 1:5 ratio.)

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

### **II. February 22, 2024 letter from Andrea Negrete, Student at Concorde Career College San Bernardino.**

#### **Comment II-1 Summary**

Ms. Negrete echoes the sentiment of "Letter F."

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

### **JJ. February 22, 2024 letter from Ashley Ousley, Dental Hygiene Student at Concorde Career College.**

#### **Comment JJ-1 Summary**

Ms. Ousley echoes the sentiment of "Letter F."

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**KK. February 22, 2024 letter from Jared Realin, BSDH 2025 Student, Vice President at University of the Pacific, Arthur A. Dugoni School of Dentistry.**

**Comment KK-1 Summary**

Mr. Realin echoes the sentiment of “Letter F.”

**Comment KK-2 Summary**

Mr. Realin states less self-confident and incompetent dental hygiene students may be the result with a 1:6 ratio, as well as the production of less qualified hygienists and a disservice to the profession.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**LL. February 22, 2024 letter from Sarah Lu, Student at University of the Pacific, Arthur A. Dugoni School of Dentistry.**

**Comment LL-1 Summary**

Ms. Lu echoes the sentiment of “Letter F.”

**Comment LL-2 Summary**

Ms. Lu states she personally has noticed a lot of time is wasted, and that students tend to take longer than the set clinic time since students are all in need of instructors at the same time and must wait for their turn.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**MM. February 22, 2024 letter from Jennifer Kwong, Student at University of the Pacific, Arthur A. Dugoni School of Dentistry.**

**Comment MM-1 Summary**

Ms. Kwong echoes the sentiment of “Letter F.”

## **Comment MM-2 Summary**

Ms. Kwong states as a current dental hygiene student who is practicing in clinic, they have a 1:4 ratio and feels it is already difficult to gain our instructor's attention when students need assistance. She provided a specific example of an instructor is assisting a student with a feedback form while a second student wishes to clarify a process or ask for assistance. She states this divides the time of the instructor and delays the assistance of the second student as the feedback form task is time intensive. Ms. Kwong states if there was to be an increase to a 1:6 ratio, she believes it will take away from students being proficient in the skills that are required, and will be unable to give the best oral healthcare they can provide.

### **Response:**

The Board acknowledges and appreciates the support for the regulation.

## **NN. February 23, 2024 letter from Ashley Gonzales, Student at Concorde Career College.**

### **Comment NN-1 Summary**

Ms. Gonzales echoes the sentiment of "Letter F."

### **Response:**

The Board acknowledges and appreciates the support for the regulation.

## **OO. February 25, 2024 letter from Aisha Alhour, Student, Class of 2025 at University of the Pacific.**

### **Comment OO-1 Summary**

Ms. Alhour echoes the sentiment of "Letter F."

### **Comment OO-2 Summary**

Ms. Alhour states as a student, she urgently requests the retention of the current 1:5 ratio. She states under the existing 1:5 ratio, she already struggles to receive timely feedback during clinic hours, and an increase to 1:6 would exacerbate these challenges, potentially delaying her graduation and qualification as competent providers. She requests the Board to prioritize the well-being and success of students by maintaining the current 1:5 ratio.

### **Response:**



The Board acknowledges and appreciates the support for the regulation.

**PP. February 26, 2024 letter from Meghan Catalano, Clinic Instructor at Cypress College.**

#### **Comment PP-1 Summary**

Ms. Catalano echoes the sentiment of “Letter F.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**QQ. February 26, 2024 letter from Yeleng Thao, Student Hygienist at San Joaquin Valley College - Visalia, CA.**

#### **Comment QQ-1 Summary**

Ms. Thao echoes the sentiment of “Letter F.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**RR. February 26, 2024 letter from Donna Smith, BSDH, MEd, RDHAP, Adjunct Faculty at West Los Angeles College and Past Full-Time Faculty at University of Southern California.**

#### **Comment RR-1 Summary**

Ms. Smith echoes the sentiment of “Letter F.”

#### **Comment RR-2 Summary**

Ms. Smith states Having taught in the dental hygiene profession for 50 years, she remembers the original 1:6 teaching ratio. She states it was very difficult to give each student the individual attention that they needed in order to perfect their skills. Ms. Smith added that even the 1:5 teaching ratio can be over whelming to both student and faculty. She states each patient case must be assessed and treated in a timely fashion and that when students are waiting for faculty feedback, their time is not used efficiently.

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**SS. February 26, 2024 letter from Charles D. Cort, RDH, MA, Program Director, Shasta College Dental Hygiene.**

**Comment SS-1 Summary**

Mr. Cort echoes the sentiment of “Letter F.”

**Comment SS-2 Summary**

Mr. Cort states he has worked as a teaching professional since 2000, including working for ten years at the previously mandated 1:6 ratio. He states he knows firsthand that both student learning and patient safety are jeopardized when direct oversight is reduced. Mr. Cort states he is strongly opposed to increasing the 1:5 ratio.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**TT. February 15, 2024 letter (Received February 26, 2024) from Senior Graduating Students, West Coast University (21 Signatures).**

**Comment TT-1 Summary**

West Coast University (WCU) Senior Students echo the sentiment of “Letter F.”

**Comment TT-2 Summary**

WCU Senior Students state closer supervision ensures students master dental hygiene techniques more effectively. They added should a medical emergency arise, there will be limited faculty accessibility to address the situation.

**Comment TT-3 Summary**

WCU Senior Students state increasing the faculty to student ratio will delay patient treatment and increase the number of patient appointments. They added if a faculty member falls ill, the ratio is significantly affected.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**UU. February 12, 2024 letter (Received February 26, 2024) from Cohort 40 Students, West Coast University (21 Signatures).**

**Comment UU-1 Summary**

WCU Cohort 40 echoes the sentiment of “Letter F.”

**Comment UU-2 Summary**

WCU Cohort 40 states an increase in the ratio could lead to delayed and unsafe patient care could occur if an emergency occurs, a lack of service due to students struggling with instrumentation or residual calculus without receiving feedback, and (the current ratio) gives attention to continue on and improve.

**Comment UU-3 Summary**

WCU Cohort 40 states an increase in the ratio could lead to compromised student learning and negative patient rapport due to increased waiting time. They add 1:3 or 1:4 ratio could be beneficial because a 1:5 ratio is still challenging and that there may be a negative liability to the faculty’s license due to a student performing poorly.

**Comment UU-4 Summary**

WCU Cohort 40 states California has a higher standard where more technology is introduced, leading to the need for more faculty interaction. They added if students didn’t have enough time to complete competencies, it may result in students not graduating and have a negative effect on the quality of education.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**VV. February 16, 2024 letter (Received February 26, 2024) from Cohort 41 Students, West Coast University (21 Signatures).**

**Comment VV-1 Summary**

WCU Cohort 41 echoes the sentiment of “Letter F.”

**Comment VV-2 Summary**

WCU Cohort 41 states teamwork is a desired quality in dental professionals but, an increase in the faculty to student ratio will result in competition between the students instead of a team approach. They add dental hygiene education is a unique experience, with lifelong friendships formed. By increasing the ratio, it will result in tension among the students due to competition for faculty attention.

### **Comment VV-3 Summary**

WCU Cohort 41 states a 1:6 ratio will result in either loss of jobs for some faculty because programs will need less faculty or programs will need additional facilities to accommodate additional students, which they may not have.

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**WW. February 23, 2024 letter (Received February 26, 2024) from Aubree Chismark, RDH, MS, Associate Professor and Junior Clinic Coordinator, and Cohort 42 Students, West Coast University (25 Signatures).**

### **Comment WW-1 Summary**

Ms. Chismark and WCU Cohort 42 echoes the sentiment of “Letter F.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**XX. February 15, 2024 letter (Received February 26, 2024) from Cohort 43 Students, West Coast University (25 Signatures).**

### **Comment XX-1 Summary**

WCU Cohort 43 echoes the sentiment of “Letter TT.”

#### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**YY. February 26, 2024 letter from Anna C. Gentry, Full Time Faculty at Cypress College.**

### **Comment YY-1 Summary**

Ms. Gentry echoes the sentiment of “Letter F.”

### **Comment YY-2 Summary**

Ms. Gentry states there is great concern regarding the loss of individualized instruction which may have a direct and negative impact upon the level of care provided to patients

both in the educational setting and the workforce. She states with the change in legislation eliminating the clinical examination for students graduating from California dental hygiene educational programs, there is a greater burden and responsibility placed upon those programs, requiring more time between the faculty and student to determine whether students are competent and qualify for licensure.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**ZZ. February 26, 2024 letter from Sandra Chie, RDH, BS, MSDH, Assistant Professor of Clinical Dental Hygiene at West Los Angeles College.**

**Comment ZZ-1 Summary**

Ms. Chie echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**AAA. February 26, 2024 letter from Alyson Yamaichi, Clinic Instructor at Foothill College.**

**Comment AAA-1 Summary**

Ms. Yamaichi echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**BBB. February 26, 2024 letter from Julia Velasco, Student at West Los Angeles College.**

**Comment BBB-1 Summary**

Ms. Velasco echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**CCC. February 26, 2024 letter from Mireya Vasquez, Student at West Los Angeles College.**

**Comment CCC-1 Summary**

Ms. Vasquez echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**DDD. February 26, 2024 letter from Lisa Huitron, Student at West Los Angeles College.**

**Comment DDD-1 Summary**

Ms. Huitron echoes the sentiment of “Letter F.”

**Comment DDD-2 Summary**

Ms. Huitron states as a current student she cannot fathom having an additional person add to the clinic area for the professor to spend time with, as the 1:5 ratio is difficult enough as it is, and thought the ratio was 1:4. She states everyone is at different levels, needs help at different times, and that it is tough having questions for the professor when they are busy helping someone else. She states adding one more person to the group would make this problem much larger.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**EEE. February 26, 2024 letter from Rosario Fernandez ,Clinical Instructor at Oxnard College Dental Hygiene.**

**Comment EEE-1 Summary**

Ms. Fernandez echoes the sentiment of “Letter F.”

**Comment EEE-2 Summary**

Ms. Fernandez states increasing the ratio to 1:6 will only make teaching more challenging for instructors, as well as students. She states that due to the amount of clinic time, it does not allow instructors to spend quality time teaching the fundamentals to create a strong foundation for competent clinicians.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**FFF. February 26, 2024 letter from Terry Cao, Dental Hygiene Student, Cabrillo College.**

**Comment FFF-1 Summary**

Ms. Cao echoes the sentiment of “Letter F.”

**Comment FFF-2 Summary**

Ms. Cao states she feels the quality of her education will be vastly affected if she has less clinical one on one instruction time, as the student are already barely making it on time. Additionally, she states she strongly feels this will deter instructors from joining the education field or reduce the current teachers because their workload is already at an all-time high. She states the instructors “pour their heart out doing their utmost to keep the clinic going, any more work we will see the number of instructors go down.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**GGG. February 26, 2024 letter from Janelle Miller, Student at Moreno Valley College.**

**Comment GGG-1 Summary**

Ms. Miller echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**HHH. February 26, 2024 letter from Brenda Barrientos, MS, RDH, Clinical Faculty Instructor, Foothill College Dental Hygiene Program.**

**Comment HHH-1 Summary**

Ms. Barrientos echoes the sentiment of “Letter F.”

**Comment HHH-2 Summary**

Ms. Barrientos states dentistry and dental hygiene are “contact” professions, and that there is a need for guidance and instruction for emotional intelligence, skill, and technique when in clinical practice.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**III. February 26, 2024 letter from Truc Ho, Student, University of the Pacific, Arthur A. Dugoni School of Dentistry.**

**Comment III-1 Summary**

Ms. Ho echoes the sentiment of “Letter F.”

**Comment III-2 Summary**

Ms. Ho states as a current student, she has seen how limited time is for interaction between the instructor and three or four students, and how it is even more difficult with five students. She states she could not imagine the stress and time constraint if the ratio was increased to 1:6.

Ms. Ho states there must be enough time for students to receive guidance from instructors in clinic to allow students to correctly and effectively practice their skills, as some skills cannot simply be taught didactically.

**Comment III-2 Summary**

Ms. Ho states expanding the ratio to 1:6 will not only affect future students, but also current students as they will be working along future students as well. She states she wants future colleagues to be competent dental hygienists as well.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**JJJ. February 27, 2024 letter from Laura Aguilar, RDH # 35506.**

**Comment JJJ-1 Summary**

Ms. Aguilar states she does not believe it is a good idea to increase the ratio to 1:6. She states as a fairly recent graduate she remembers how difficult it was for her professors to keep up with 5 students.

Ms. Aguilar states if the ratio was increased, not only would it be more work for the professors who already have full plates, the students would not receive a quality



education. She states it was already difficult to get one on one time during clinic when there was a 1:5 ratio, and adding an extra person will make it nearly impossible for faculty.

### **Comment JJJ-2 Summary**

Ms. Aguilar urges whoever is trying to change the ratio from 1:5 to 1:6, to “go out in the field and spend some time out there. I don’t mean for a day either, maybe a whole semester or a whole year. I would be willing to bet that after spending some time in the field, that person would agree that increasing the ratio is a bad idea not only for the well-being of the professors but for the students as well.”

### **Response:**

The Board acknowledges and appreciates the support for the regulation.

### **KKK. February 27, 2024 letter from Luisa Cayasso, student at University of the Pacific, Arthur A. Dugoni School of Dentistry.**

### **Comment KKK-1 Summary**

Ms. Cayasso echoes the sentiment of “Letter F.”

### **Comment KKK-2 Summary**

Ms. Cayasso states she has already experienced all of the concerns expressed in Comment KKK-1 only two months into her dental hygiene education. She states there have already been multiple pre-clinical periods where she and her peers and have stayed pass the blocked hours. Ms. Cayasso states the students struggle with time management even with their 1:4 ratio and longer chair times, compared to other schools who are following the 1:5 ratio, and who possibly will implement the expanded 1:6 ratio.

Ms. Cayasso states, “faculty cannot effectively teach their students and students cannot effectively learn and progress in such a hands-on, strategic and meticulous career if we are not observed closely.” In addition, she states it is her understanding that competencies and observations take a longer time to complete in comparison to pre-clinical feedback. She states if both faculty and students are struggling now, students will struggle in the future, potentially and unnecessarily extending a student’s education.

### **Response:**

The Board acknowledges and appreciates the support for the regulation.

**LLL. February 27, 2024 letter from Chaeyeon Lee, Student, University of the Pacific, Arthur A. Dugoni School of Dentistry.**

**Comment LLL-1 Summary**

Ms. Lee echoes the sentiment of “Letter F.”

**Comment LLL-2 Summary**

Ms. Lee states by increasing the 1:5 ratio to 1:6 would provide less opportunity to receive assistance from faculty during the clinic due to other students waiting for their turn. Additionally, she states based on personal experience, she has encountered delays in patient treatment waiting for approvals.

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**MMM. February 27, 2024 letter from Jeannette Diaz, MPH, MSDH, RDH, RDHAP, FADHA, Adjunct Faculty Cerritos College.**

**Comment MMM-1 Summary**

Ms. Diaz echoes the sentiment of “Letter F.”

**Response:**

The Board acknowledges and appreciates the support for the regulation.

**NNN. February 15, 2024 letter from Martha Warner, RDH.**

**Comment NNN-1 Summary**

Ms. Warner provided an initial letter “In support of dental education.” As the letter provided conflicting information, Board staff requested clarifying information from Ms. Warner. Upon this request, Ms. Warner retracted her letter of support stating she supported a 1:6 ratio. Upon clarification as to if she wanted to express an opposition to the regulation, no additional response was received.

**Response:**

The Board acknowledges and thanks Ms. Warner for her comments. However, the Board believes that the anticipated benefits of the proposed regulation of establishing the faculty to student ratio in regulation outweigh any of the concerns cited in this letter and are summarized below.

First, by maintaining the faculty to student ratios currently in place in DHEPs, it will protect the data the Board utilized in their decision to eliminate the clinical board exam in statute, thereby protecting consumer safety in newly licensed RDHs.

Second, by maintaining the faculty to student ratios currently in place in DHEPs, it provides for adequate supervision of RDH students during preclinical, clinical, and laboratory sessions, thereby protecting the consumer safety during their treatment as patients at DHEPs.

Third, as students of DHEPs are also considered consumers, it protects their right to receive adequate faculty guidance in their quest to gain foundational knowledge to be a well-educated and safe practitioner.

Fourth, by placing the current faculty to student ratios currently in regulation, it places the faculty to student ratios under the purview of the Board, thereby ensuring adequate supervision of RDH students during preclinical, clinical, and laboratory practice should CODA be inclined to change the faculty to student ratio indiscriminately at a future date.