

DENTAL COVID-19 FAQ

I am a dentist licensed in Hawaii. May I engage in my scope of practice during the COVID-19 pandemic?

Yes. Licensed dentists and dental hygienists are currently allowed to practice and shall practice levels of infection control consistent with the guidelines and recommendations of the U.S. Department of Health and Human Services, Centers for Disease Control and Prevention (CDC) and the ADA, pursuant to section 16-79-8 Approved infection control practices, Hawaii Administrative Rules (“HAR”).

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/dental-settings.html>

It is highly recommended that you check with the county you currently practice in to determine whether there are other guidelines that you may need to follow. Contact information for each county is below:

City and County of Honolulu: (808) 768-2489

County of Kauai: (808) 241-4903

County of Maui: (808) 270-7855

County of Hawaii (Big Island): (808) 935-0031

What are the personal protective equipment (PPE) requirements for dentists during the COVID-19 pandemic?

Hawaii Administrative Rules section 16-79-8 (Approved infection control practices) provides that “[l]icensed dentists and licensed dental hygienists shall practice levels of infection control consistent with the guidelines and recommendations of the U.S. Department of Health and Human Services, Centers for Disease Control and Prevention (CDC)[,] and the [American Dental Association] ADA.” The CDC advises that dentists use the highest level of PPE or wear a “minimally acceptable combination of a surgical mask and a full-face shield.” **If the minimally acceptable combination of a surgical mask and a full-face shield is not available, the dentist should not perform any emergency dental care and should instead refer the patient to a clinician who has the appropriate PPE.** The ADA also recommends that dentists use the highest level of PPE available when treating patients to reduce the risk of exposure.

As the regulatory body for dentists, the Board of Dentistry reminds licensees that even during the COVID-19 pandemic, they are required to follow the Board’s statutes and rules, which include adhering to the guidelines and recommendations of the U.S.

Department of Health and Human Services, CDC, the ADA, and the various county proclamations.

I am a dentist licensed in another state. Do I need to be licensed in Hawaii to practice dentistry in Hawaii during the COVID-19 pandemic? Do I need to be licensed in Hawaii to provide telehealth services within my scope of practice for Hawaii patients during the COVID-19 pandemic?

Yes to both questions. A valid Hawaii license issued pursuant to Hawaii Revised Statutes chapter 448 is required to engage in the practice of dentistry or dental surgery in the State, including telehealth (e.g., providing a consultation from another state to a Hawaii resident). To engage in telehealth, you must be licensed in your home state and the state in which your patient currently resides. You must also abide by the laws and regulations of both states.

For further information, please see:

- Hawaii Revised Statutes section 448-1 (dentistry defined; exempted practices);
- Hawaii Administrative Rules section 16-79-9 (who may apply for a dental or dental hygiene license); and
- Hawaii Administrative Rules section 16-79-11 (documentation and credentials required for dental applicants).

During the COVID-19 pandemic, will the Board of Dentistry (“Board”) accept the new WREB, SRTA, CRDTS, or CDCA non-patient dental examination to fulfill the examination requirement for licensure?

No. The Board of Dentistry requires passage of the American Board of Dental Examiners (ADEX) examination. The grant of an exemption to this requirement is not available, even under special circumstances like the COVID-19 pandemic.

For further information, please see:

- Hawaii Revised Statutes section 448-9.4 (American Board of Dental Examiners (ADEX) examination; regional examinations);
- Hawaii Administrative Rules section 16-79-9 (who may apply for a dental or dental hygiene license); and
- Hawaii Administrative Rules section 16-79-11 (documentation and credentials required for dental applicants).

Update for Dental License: On October 2, 2020, the Board of Dentistry voted to accept the ADEX CompeDont manikin-based examination and the manikin-based periodontal clinical examination, as referenced in Hawaii Revised Statutes section 448-9.4 American Board of Dental Examiners (ADEX). Dentist licensure applicants must still pass all sections of the ADEX exam in their entirety. The ADEX full manikin based dental licensure exam taken anytime on or after June 5, 2020 is acceptable for a dentist license.

Update for Dental Hygiene License: On January 25, 2021, the Board of Dentistry voted to accept the manikin-based regional dental hygiene examination, as reference in Hawaii Revised Statutes section 447-1 (b), from the following agencies:

- (1) The Western Regional Examining Board ("WREB");
- (2) The Central Regional Dental Testing Service, Inc. ("CRDTS");
- (3) The Southern Regional Testing Agency, Inc. ("SRTA"); or
- (4) The North East Regional Board of Dental Examiners ("NERB"), currently known as the Commission on Dental Competency Assessments ("CDCA").

Dental hygiene licensure applicants must still pass all sections of the licensure examination in their entirety.

Due to social distancing recommendations, will the Board of Dentistry ("Board") accept live-interactive continuing education (CE) webinars, in lieu of live-attended CE courses, to fulfill the CE requirement for licensure?

No. At this time, the statutes and rules that govern the practice of dentistry do not authorize the Board of Dentistry to grant exemptions to its CE requirements due to special circumstances like the COVID-19 pandemic. However, the Board may consider CE waivers or modifications, whereby licensees request a waiver or modification to the CE requirement due to disability, full-time active military service, illness, retirement, or undue hardship. The next biennial renewal CE period is from January 1, 2020, to December 31, 2021.

For further information, please see:

- Hawaii Administrative Rules section 16-79-141 (continuing education categories);
- Hawaii Administrative Rules section 6-79-144 (biennial renewal); and
- Hawaii Administrative Rules section 16-79-147 (waiver or modification of requirements).

Note that a maximum of eight (8) CE clinical course hours taken "through computer" will be accepted, pursuant to §16-79-141 Continuing education categories, HAR. The Board is unable to allow any exemptions to its rules – even under the current situation.

However, due to the pandemic, most CE sponsors are conducting live virtual courses, eliminating or limiting the availability of live-attended course hours. Therefore, licensees may seek a modification or a waiver of their CEs by submitting a request to the Board of Dentistry, pursuant to section 16-79-147, Waiver or modification of requirements, HAR.

To request for a modification or waiver, a licensee will need to submit a written notification to the Board requesting approval of renewal without full compliance of the CE requirements, having completed all required CE hours virtually or through correspondence type courses due to undue hardship because of the pandemic.

Biennial audit renewal period and the dates of required CE course hours

Renewal audit period = Jan 1, 2020 to Dec 31, 2021
CEs completed for period Jan 2, 2018 to Dec 31, 2019

Renewal audit period = Jan 1, 2022 to Dec 31, 2023
CEs completed for period Jan 2, 2020 to Dec 31, 2021

Inquiries on COVID testing by licensed dentists.

Note that although the statutes and rules that govern the practice of dentistry are silent on the administration of COVID testing, there are multiple requirements that a licensed dentist would need to meet before administering COVID tests in Hawaii. Of which includes the additional requirement of qualifying for the Hawaii Clinical Laboratory Permit and the need for a medical technologist consultant.

For more detailed information and questions on administering COVID tests, please contact Paul Kuiken of the Hawaii Department of Health at:

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