

Report Highlights

Why DLA Performed This Audit

This audit was performed to determine if there is a continued need for the board and if its termination date should be extended. The board is set to sunset on June 30, 2027, and will have one year from that date to conclude its administrative operation.

What the Legislative Auditor Recommends

1. The board should consider adopting a regulation to facilitate the removal of chronically absent board members.
2. The board should actively work towards updating sedation regulations.
3. The Division of Corporations, Business and Professional Licensing (DCBPL) director should ensure board fees are set in accordance with statute or seek a statutory change if deemed necessary.
4. DCBPL's director should improve training to help ensure staff properly terminate certificates when related licenses are no longer valid.

A Sunset Review of the Department of Commerce, Community, and Economic Development, Board of Dental Examiners (board)

May 7, 2026

Audit Control Number 08-20150-26

REPORT CONCLUSIONS

The board served the public's interest by generally conducting meetings in an effective manner, actively amending regulations, and issuing licenses in compliance with State law. The audit also found a chronically absent board member was not appropriately removed, sedation regulations were not amended in a timely manner, and two administrative deficiencies needed to be addressed.

In accordance with AS 08.03.010(c)(7), the board is scheduled to terminate on June 30, 2027. We recommend that the legislature extend the board's termination date six years to June 30, 2033, which is two years less than the eight-year maximum allowed by statute. The reduced extension reflects the need for more routine oversight in recognition of the audit findings.

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ALASKA STATE LEGISLATURE

LEGISLATIVE BUDGET AND AUDIT COMMITTEE

Division of Legislative Audit



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May 19, 2026

Members of the Legislative Budget
and Audit Committee:

In accordance with the provisions of Title 24 and Title 44 of the Alaska Statutes (sunset legislation), we have reviewed the activities of the Board of Dental Examiners, and the attached report is submitted for your review.

DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT BOARD OF DENTAL EXAMINERS SUNSET REVIEW

May 7, 2026

Audit Control Number
08-20150-26

The audit was conducted as required by AS 44.66.050(a). Per AS 08.03.010(c)(7), the Board of Dental Examiners is scheduled to terminate on June 30, 2027. We recommend that the Legislature extend the board's termination date to June 30, 2033.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Procedures utilized in the course of developing the findings and recommendations presented in this report are discussed in the Objectives, Scope, and Methodology section.

A handwritten signature in blue ink, appearing to read "Kris Curtis".

Kris Curtis, CPA, CISA
Legislative Auditor

ABBREVIATIONS

AAC	Alaska Administrative Code
ACN	Audit Control Number
AS	Alaska Statute
board	Board of Dental Examiners
CISA	Certified Information Systems Auditor
CPA	Certified Public Accountant
DCBPL	Division of Corporations, Business and Professional Licensing
DCCED	Department of Commerce, Community, and Economic Development
DEA	Drug Enforcement Administration
DOH	Department of Health
FY	Fiscal Year
PDMP	Alaska Prescription Drug Monitoring Program
SB	Senate Bill

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ORGANIZATION AND FUNCTION

Board of Dental Examiners (board)

The board was established under the provisions of AS 08.36.010 for the purpose of regulating the practice of dentistry in Alaska. The board is comprised of nine members: six dentists, two dental hygienists, and one public member who does not have a direct financial interest in the health care industry. The dentist and dental hygienist members must be licensed and have practiced in Alaska for the five years immediately preceding appointment to the board. Exhibit 1 shows the board members as of January 31, 2026.

Per Alaska Statute 08.36.070, board duties include:

1. Providing for the examination of applicants and the credentialing, registration, and licensure of qualified applicants;
2. Holding hearings and ordering the disciplinary sanction of a person who violates statutes and regulations;
3. Adopting regulations ensuring that renewal of a license, registration, or certificate is contingent upon proof of continued professional competence;
4. Issuing permits or certificates to licensed dentists, licensed dental hygienists, and dental assistants who meet standards determined by the board for procedures that require specific education and training; and
5. Requiring that a licensed dentist who has a federal Drug Enforcement Administration registration number registers with the controlled substance prescription database.

Exhibit 1

Board of Dental Examiners Members as of January 31, 2026

Christina Hansen, Chair <i>Dental Hygienist</i>
Traci Elison <i>Dentist</i>
Travis Perkins <i>Dentist</i>
Dominic Wenzell <i>Dentist</i>
Jesse Hronkin <i>Dentist</i>
Kenley Michaud <i>Dentist</i>
Newell Walther <i>Dentist</i>
Megan Ferguson <i>Dental Hygienist</i>
Vacant <i>Public Member</i>

Source: Office of the Governor, Boards and Commissions.

DCCED's Division of Corporations, Business and Professional Licensing (DCBPL)

Per AS 08.36.073, the board has a dedicated staff member to conduct investigations into alleged violations based on complaints filed with Department of Commerce, Community, and Economic Development (DCCED) or the board.

DCBPL provides administrative and investigative assistance to the board. Administrative assistance includes budgetary services and functions such as collecting fees, maintaining files, receiving application forms, publishing notices for meetings, and assisting the board with regulations. DCCED is required by AS 08.01.065 to adopt regulations that establish the amount and manner of payment for application, license, investigation, and other fees as appropriate.

Alaska Statute 08.01.087 gives DCBPL authority to act on its own initiative or in response to a complaint. DCBPL staff may:

1. Conduct an investigation to determine whether a person has violated a law;
2. Bring an action in Superior Court to enjoin the acts or practices;
3. Examine or have examined the books and records of a person whose business activities require a business license or licensure by a board or commission listed in AS 08.01.010, or whose occupation is listed in AS 08.01.010; and
4. Issue subpoenas for the attendance of witnesses and the production of records.

REPORT CONCLUSIONS

In developing our conclusion regarding whether the Board of Dental Examiners' (board) termination date should be extended, its operations were evaluated using the 11 factors set out in AS 44.66.050(c), which are included as Appendix A to this report. Under the State's "sunset" law, these factors are to be considered in assessing whether an entity has demonstrated a public need for continuing operations.

The audit concluded that the board served the public's interest by generally conducting meetings in an effective manner, actively amending regulations, and issuing licenses in compliance with State law. The audit also found a chronically absent board member was not appropriately removed, sedation regulations were not amended in a timely manner, and two administrative deficiencies needed to be addressed.

In accordance with AS 08.03.010(c)(7), the board is scheduled to terminate on June 30, 2027. We recommend that the legislature extend the board's termination date six years to June 30, 2033, which is two years less than the eight-year maximum allowed by statute. The reduced extension reflects the need for more routine oversight in recognition of the audit findings.

Detailed report conclusions are as follows.

The board generally conducted its meetings effectively and did not duplicate the efforts of other entities.

The board met 17 times from July 2022 through January 2026. A review of 11 board meetings found all meetings allotted time for public comment and quorum was met. Further, the audit found all but one of the meetings were properly noticed to the public.

The audit concluded that the board's public member was absent from all but one of the board meetings from the time of the member's appointment in August 2022, through March 2025, the month the term expired. Further, the member remained on the board roster for an additional eight months after the term expired. Division of Corporations, Business and Professional Licensing (DCBPL) management communicated the member's lack of attendance

to the Office of the Governor, Boards and Commissions in August 2024 and requested removal and replacement of the public board member in November 2024, March 2025, and November 2025. (See Recommendation 1)

As the only entity with the authority to license and regulate dental professionals in Alaska, the board does not duplicate the actions of another agency.

The board recommended statutory changes and actively amended regulations.

During the audit period, the board recommended passage of Senate Bill (SB) 173, which established an advanced practice dental hygiene permit, created a dental specialist license and enforcement standards, moved oversight of dental radiological equipment from the board to the Department of Health (DOH), and updated centralized fee statutes to fund radiological inspection activities. SB 173 passed and became effective July 2023.

During the audit period, the board actively amended regulations. Significant regulation changes included:

- Removing personal references and interviews from licensing requirements. These changes removed licensing barriers;
- Adding advanced practice and specialist pathways to help ensure dental practitioners that promote themselves as being specialists meet certain minimum qualifications. This amendment enhanced public awareness and safety;
- Allowing mannequin-based board exams. This change facilitated the licensing process by removing the requirement to secure live patients for exam purposes; and
- Removing radiology regulations to conform with statutory changes.

The board issued licenses in compliance with statutes and regulations; however, a few perpetual certificates were not terminated when related licenses expired.

As shown in Exhibit 2 on page 7, there were 3,179 active licenses, certificates, endorsements, and permits as of January 31, 2026. Auditors tested a sample of 15 new and 10 renewal licenses, as well as related certificates, endorsements, and certificates issued during the audit period, and found all were issued in compliance with statutes and regulations. Additionally, the audit reviewed the listing of all active licenses and identified two former dental hygienists with active hygienist local anesthetic agent certificates. The dental hygienist licenses were surrendered or expired during FY 19; however, the associated certificates were not terminated until identified by the audit team. (See Recommendation 4)

Nine dentist licenses issued during July 2024 through January 2026 was tested for compliance with the Alaska Prescription Drug Monitoring Program (PDMP) registration requirements. Per 12 AAC 28.953(1), licensed dentists that hold a federal Drug Enforcement Administration (DEA) number must register with the PDMP database no later than 30 days after initial licensure or registration with the DEA. Auditors found all nine licenses complied with the PDMP registration requirements. Additionally, the audit reviewed three licensees that had their prescription authority suspended or revoked to determine whether the regulatory authorities were notified. In all three cases, the appropriate entities were notified of the license action.

Sedation regulations were not updated in a timely manner.

The audit found that Alaska's dental sedation regulations needed to be amended. According to a board member, the sedation regulations did not provide adequate guidance for pediatric patients and failed to incorporate national best practices. Revising sedation regulations was identified as a goal in the board's FY 23 annual report and a subcommittee was formed in August 2023 to work on the regulation project. The board also discussed the need for updates at approximately half of its meetings held during the audit period. Despite routinely identifying the need to update the sedation regulations, the project did not progress after amendments were drafted in August 2024. (See Recommendation 2)

Board related investigations were not consistently conducted in a timely manner; however, delays were justified.

A total of 166 board related cases were open or opened from July 2022 through January 2026. The audit identified 114 cases were open over 180 days, of which 45 were open over 1,000 days. The audit reviewed 12 cases open over 180 days and found four had periods of inactivity ranging from 49 to 223 days. Investigators chose to delay the four investigations multiple times because the cases were considered lower priority and did not pose a risk to public safety. The audit confirmed that board investigators were processing a large number of PDMP registration cases, which limited available resources.

Board fees generally covered regulatory costs.

The board's schedule of revenues and expenditures for FY 23 through January 2026 is shown in Exhibit 3 on page 8. The board mainly receives its revenue from licensure and renewal fees. Renewals are conducted on a biennial basis, creating a two-year cycle in board revenues. As shown in Exhibit 3, the board had a cumulative surplus of \$90,566 as of January 2026. The board's schedule of fees is shown in Appendix B to this report.

The audit noted that board fees did not fully comply with statutes. SB 173 required board fees be set at a level that covered all board operational costs including those associated with inspecting dental radiological equipment. According to DCBPL management and a board member, board fees were not set at a level that covered the costs of inspecting radiological equipment. Rather, inspection costs were directly billed to dental offices by DOH. (See Recommendation 3)

Exhibit 2

**Board of Dental Examiners
License, Certificate, Endorsement, and Permit Activity
FY 23 through January 31, 2026**

	New Issued (Exclusive of Renewals)			Total Active as of January 31, 2026
	FY 23	FY 24	FY 25	
Licenses, Certificates, Endorsements, and Permits:				
Dental Assistant				
Coronal Polishing Certificate	114	95	84	330
Restorative Functions Certificate	5	0	1	19
Dental Hygienist				
License	61	51	46	712
Courtesy License	4	2	3	0
Advanced Practice Permit	2	2	3	8
Restorative Function Endorsement	4	4	6	78
Temporary License	1	0	0	0
Dentist				
License	62	46	61	798
Courtesy License	9	6	4	0
Temporary License	2	7	0	0
Deep Sedation and General Anesthesia Permit	1	2	2	22
Moderate Sedation Permit	13	10	5	74
Perpetual Licenses and Certificates:				
Dental Specialist Licenses				
Dental Anesthesiology	0	3	0	3
Dental Public Health	0	1	0	1
Endodontics	0	12	4	14
Oral and Maxillofacial Pathology	0	0	0	1
Oral and Maxillofacial Radiology	0	1	0	1
Oral and Maxillofacial Surgery	0	20	3	23
Orthodontics and Dentofacial Orthopedics	0	25	2	28
Pediatric Dentistry	0	35	4	42
Periodontics	0	5	1	7
Prosthodontics	0	1	1	2
Hygienist Local Anesthetic Agent Certificate	41	30	31	609
Nitrous Oxide Certificate	38	29	25	407
Total	357	387	286	3,179

Source: Compiled from DCBPL licensing database.

Exhibit 3

**Board of Dental Examiners
Schedule of Revenues and Expenditures
FY 23 through January 31, 2026
(Unaudited)**

	FY 23	FY 24	FY 25	July 1, 2025 - January 31, 2026
Revenues				
Licensing Fees	\$ 601,352	\$ 206,952	\$ 630,810	\$ 59,990
General Funds	59,056	2,075	-	-
Other Sources	-	-	-	-
Total Revenues	660,408	209,027	630,810	59,990
Direct Expenditures				
Personal Services	245,093	305,002	292,364	190,365
Travel	2,027	5,946	12,370	-
Services	102,435	38,524	5,831	27,355
Commodities	690	594	280	138
Total Direct Expenditures	350,245	350,066	310,845	217,858
Indirect Expenditures*	140,171	157,023	151,944	75,972*
Total Expenditures	490,416	507,089	462,789	293,830
Annual Surplus (Deficit)	169,992	(298,062)	168,021	(233,840)
Beginning Cumulative Surplus (Deficit)	284,455	454,447	156,385	324,406
Ending Cumulative Surplus (Deficit)	\$ 454,447	\$ 156,385	\$ 324,406	\$ 90,566

Source: DCBPL management.

*Estimated based on the indirect allocation for July 1, 2025, through December 31, 2025.

FINDINGS AND RECOMMENDATIONS

The prior 2018 sunset made two recommendations:

- The Board of Dental Examiners (board) president should take steps to correct a regulation error.
- Division of Corporations, Business and Professional Licensing's (DCBPL) chief investigator, in consultation with the board, should implement controls to ensure the appropriate entities are notified when a licensee's prescription authority is suspended or revoked.

The prior audit recommendation to correct a regulation error was resolved. The inaccurate regulatory reference noted in the prior audit was addressed when the regulation was repealed.

The prior audit recommendation to implement controls to ensure the appropriate entities are notified when a licensee's prescription authority is suspended or revoked was also resolved. During FY 23, DCBPL developed and implemented standard operating procedures regarding case closures and disciplinary action reporting. Testing as part of this audit found DCBPL notified appropriate entities of license action within a reasonable time.

This sunset audit makes four new recommendations.

Recommendation 1:

The board should consider adopting a regulation to facilitate the removal of chronically absent board members.

The public board member was absent from all but one of the 17 board meetings held during the audit period. Further, when the chronically absent board member's term expired March 2025, the member remained on the board roster until being removed November 2025.

Per AS 08.01.020, board members are appointed by the governor and serve at the pleasure of the governor. Public member absences can hinder the board's ability to conduct business with the appropriate consumer and public safety input and perspective.

DCBPL management notified the Office of the Governor, Boards and Commissions in August 2024 of the public member's lack of

attendance. Further, DCBPL management requested removal and replacement of the public member in November 2024, March 2025, and November 2025. No explanation was provided by the Boards and Commissions director regarding why the member was not removed prior to November 2025.

The board is authorized by AS 08.01.020 to create a regulation to remove board members who have three or more unexcused absences; however, the board had not elected to create such a regulation.

We recommend the board consider adopting a regulation to facilitate the removal of chronically absent board members.

Recommendation 2:

The board should actively work towards updating sedation regulations.

Revising sedation regulations was identified as a goal in the board's FY 23 annual report and a subcommittee was formed in August 2023 to work on the regulation project. Draft revised sedation regulations were presented to the board during the February and August 2024 board meetings; however, the regulation revisions were not finalized. No significant progress has been made since the August 2024 board meeting. Insufficient sedation regulations increase the risk to public safety.

Per AS 08.36.070, the board shall adopt or amend the regulations as deemed necessary. Lack of progress was attributed to conflicting national guidance, regulatory complexity, and the governor's Administrative Order 358, issued May 2025. Administrative Order 358 prohibited new regulations, but allowed an agency to request a waiver if new regulations were necessary to protect public safety. The governor's Administrative Order 360, issued August 2025, further complicated the board's regulation setting process. That order directed agencies to reduce the number of regulatory requirements by 15 percent by December 31, 2026, and 25 percent (cumulative) by December 31, 2027. According to DCBPL management, the board was planning to consider changes to sedation regulations as part of larger regulation projects as directed by the administrative orders.

We recommend the board actively work towards updating sedation regulations.

Recommendation 3:

DCBPL's director should ensure board fees are set in accordance with statute or seek a statutory change if deemed necessary.

Radiological equipment inspection costs were not included when setting board licensing fees.

Senate Bill 173, effective July 2023, moved responsibility for dental radiological equipment oversight from the board to Department of Health (DOH), and updated centralized fee statutes to ensure board license fees continued to fund radiological inspections. Alaska Statute 08.01.065(k) states that the board's fees shall be established so that the total amount of fees collected by the board approximately equals the total regulatory costs of the Department of Commerce, Community, and Economic Development, the board, **and DOH** for all occupations regulated by the board (emphasis added). In other words, board fees must be set to cover the cost of radiological inspections, with inspection costs being borne by all licensees.

According to DCBPL management, DOH preferred to be paid for inspections directly from the licensees. Furthermore, DCBPL management stated that the agency did not have a mechanism to reimburse DOH for the inspection costs. DOH's process of billing specific licensees for inspection costs resulted in the costs being borne by the specific licensee rather than all licensees.

We recommend DCBPL's director set fees in accordance with statute or seek a statutory change if deemed necessary.

Recommendation 4:

DCBPL's director should improve training to help ensure staff properly terminate certificates when related licenses are no longer valid.

The audit identified two former dental hygienists with active hygienist local anesthetic agent certificates. The dental hygienist licenses had been surrendered or expired during FY 19; however, the related certificates were not terminated until identified by auditors. According to DCBPL management, the two perpetual certificates were not terminated due to DCBPL staff error. Perpetual licenses that are not properly terminated increase the risk to public safety.

Per 12 AAC 28.350, (a) a certification to administer local anesthetic agents or nitrous oxide sedation expires on the date the dental hygienist's license expires or is revoked or suspended and (b) a certification to administer local anesthesia or nitrous oxide sedation

remains active as long as the holder's dental hygiene license is active and in good standing.

We recommend DCBPL's director improve staff training to help ensure staff properly terminate certificates when related licenses are no longer valid.

OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Title 24 and Title 44 of the Alaska Statutes, we have reviewed the activities of the board to determine if there is a demonstrated public need for its continued existence.

As required by AS 44.66.050(a), this report shall be considered by the committee of reference during the legislative oversight process in determining whether the board should be reestablished. Currently, under AS 08.03.010(c)(7), the board will terminate on June 30, 2027, and will have one year from that date to conclude its administrative operations.

Objectives

The three central, interrelated objectives of our report are to determine:

1. If the termination date of the board should be extended and for how long.
2. If the board is operating in the public's interest.
3. The status of recommendations made in the prior sunset audit.

Scope

The assessment of operations and performance of the board was based on criteria set out in AS 44.66.050(c). Criteria set out in this statute relates to the determination of a demonstrated public need for the board. We reviewed the board's activities from July 1, 2022, through January 31, 2026. Financial data is presented, unaudited, from July 1, 2022, through January 31, 2026.

Methodology

During the course of our audit, we reviewed and evaluated the following:

- The prior sunset audit report (ACN 08-20111-18) to identify issues affecting the board and to identify prior sunset audit recommendations.

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- Applicable statutes and regulations to identify board functions and responsibilities, determine whether statutory or regulatory changes enhanced or impeded board activities, and help ascertain if the board operated in the public interest.
 - Board meeting minutes and annual reports to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, and whether board vacancies impeded operations.
 - The State's Online Public Notices system to verify meetings were adequately noticed to the public.
 - Board expenditures, revenues, and fee levels for the board to determine whether fee levels covered the costs of operations.
 - Board investigation data for investigations that were open or opened from July 1, 2022, through January 31, 2026, to assess the efficiency of the investigative process.
 - Various news related websites to identify complaints against the board or other board related concerns.
 - Various websites containing information for potential duplication of board activities.

All former dental hygienists with active perpetual certificates were reviewed for testing to determine whether the certificates should have been terminated.

Internal controls over the licensing and investigative processes were assessed to determine if controls were properly designed and operating effectively. Additionally, interviews with State agency staff, the board chair, and a board member were conducted to identify and evaluate board activities. Specific areas of inquiry included: board operations, regulations, duplication of efforts, fee levels, board and staff vacancies, internal controls, and potential complaints against the board.

The audit utilized the following samples:

- A judgmental sample of 11 of 17 board meetings held from July 1, 2022, through January 31, 2026, was reviewed to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, whether the meetings were publicly noticed, and whether board vacancies impeded operations. Test results were not projected to the population.
- A random sample of 25 license applications was tested. Fifteen new applications were selected from 1,179 new licenses and 10 were selected from 2,081 renewal licenses. The new and renewal licenses were issued from July 1, 2022, through January 31, 2026. License applications were assessed for statutory and regulatory compliance. The new licenses were also tested for effectiveness of internal controls. The sample size was based on low inherent risk and moderate to high audit risk. Test results were not projected to the population.
- A sample of 12 of the 114 board related cases open 180 days or longer from July 1, 2022, through January 31, 2026, were reviewed for unjustified periods of inactivity. Five cases were selected from the 45 cases open a 1,000 days or more, and seven cases were selected from the cases open over 180 days, but less than 1,000 days. Test results were not projected to the population.

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APPENDICES SUMMARY

Appendix A provides the sunset criteria used in developing the conclusions regarding whether the Board of Dental Examiners' (board) termination date should be extended.

Appendix B provides the board's schedule of license, certificate, endorsement, and permit fees from FY 23 through January 31, 2026.

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APPENDIX A

Analysis of Public Need Criteria AS 44.66.050(c)

A determination as to whether a board or commission has demonstrated a public need for its continued existence must take into consideration the following factors:

1. the extent to which the board or commission has operated in the public interest;
2. the extent to which the operation of the board or commission has been impeded or enhanced by existing statutes, procedures, and practices that it has adopted, and any other matter, including budgetary, resource, and personnel matters;
3. the extent to which the board or commission has recommended statutory changes that are generally of benefit to the public interest;
4. the extent to which the board or commission has encouraged interested persons to report to it concerning the effect of its regulations and decisions on the effectiveness of service, economy of service, and availability of service that it has provided;
5. the extent to which the board or commission has encouraged public participation in the making of its regulations and decisions;
6. the efficiency with which public inquiries or complaints regarding the activities of the board or commission filed with it, with the department to which a board or commission is administratively assigned, or with the office of victims' rights or the office of the ombudsman have been processed and resolved;
7. the extent to which a board or commission that regulates entry into an occupation or profession has presented qualified applicants to serve the public;

APPENDIX A

(Continued)

8. the extent to which state personnel practices, including affirmative action requirements, have been complied with by the board or commission in its own activities and in the area of activity or interest;
9. the extent to which statutory, regulatory, budgetary, or other changes are necessary to enable the board or commission to better serve the interests of the public and to comply with the factors enumerated in this subsection;
10. the extent to which the board or commission has effectively attained its objectives and purposes and the efficiency with which the board or commission has operated; and
11. the extent to which the board or commission duplicates the activities of another governmental agency or the private sector.

APPENDIX B

Board of Dental Examiners License, Certificate, Endorsement, and Permit Fees FY 23 through January 31, 2026

	FY 23	FY 24	FY 25	July 1, 2025 - January 31, 2026
Dental Assistants:				
Coronal Polishing and Restorative Function				
Certificates:				
Nonrefundable application fee	\$ 60	\$ 60	\$ 60	\$ 60
Initial or renewal certification fee	60	60	60	60
Dental Hygienists:				
Nonrefundable application fee:				
Initial License	100	100	100	100
Courtesy License	50	50	50	50
Initial Restorative Function Endorsement	100	100	100	100
Local Anesthetic Permit	100	100	100	100
Nitrous Oxide Certification	100	100	100	100
Advanced Practice Permit	100	100	100	100
Initial or renewal license fee	200	200	200	200
Local Anesthetic Permit fee	100	100	100	100
Credential review fee*	110	110	110	0
Courtesy License fee	50	50	50	50
Restorative Function endorsement & renewal fee	60	60	60	60
Nitrous Oxide Certification one-time fee	100	100	100	100
Advanced Practice Permit and renewal fee	200	200	200	200
Dentists:				
Nonrefundable application fee:				
Initial License by Examination	600	600	0	0
Initial License	0	0	600	600
License by Credentials*	1,000	1,000	0	0
Courtesy License	50	50	50	50
Deep Sedation, Moderate Sedation, Minimal Sedation, or General Anesthetic Permit	1,000	1,000	1,000	1,000
Temporary Permit	50	50	50	50
Specialist License	0	300	300	300

*Fee and/or license type was repealed effective September 12, 2024.

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APPENDIX B

(Continued)

Board of Dental Examiners License, Certificate, Endorsement, and Permit Fees FY 23 through January 31, 2026 (Continued)

Initial biennial or renewal fee	\$ 450	\$ 450	\$ 450	\$ 450
Deep Sedation, Moderate Sedation, or Minimal Sedation Permit for initial period fee	1,000	1,000	1,000	1,000
Biennial Deep Sedation, Moderate Sedation, or Minimal Sedation Permit renewal fee	350	350	350	350
General Anesthetic Permit for initial period fee	1,000	1,000	1,000	1,000
Biennial General Anesthetic Permit renewal fee	350	350	350	350
Courtesy License fee	50	50	50	50
Temporary Permit fee	112.5	112.5	112.5	112.5
Temporary Permit extension fee	50	50	50	50
Specialist License fee for initial period	0	450	450	450
Continuing education course submittal fee	50	50	50	50

Source: 12 AAC 02.190, 12 AAC 28.810, 12 AAC 28.840, 12 AAC 28.850, 12 AAC 28.880.

Agency Response from the Department of Commerce, Community, and Economic Development



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community, and Economic Development

OFFICE OF THE COMMISSIONER
Julie Sande, Commissioner

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August 4, 2026

Kris Curtis
Legislative Auditor
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Juneau, Alaska 99811-3300

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AUG 06 2026

LEGISLATIVE AUDIT

Dear Ms. Curtis:

Thank you for the July 16, 2026, Confidential Preliminary Report, Department of Commerce, Community, and Economic Development (DCCED), Board of Dental Examiners Sunset Review. I appreciate the opportunity to respond to the draft findings related to the sunset review for the Board of Dental Examiners (board) before they become final. I concur with all six conclusions and all four recommendations. Please see the following comments regarding the recommendations:

Recommendation 1: The board should consider adopting a regulation to facilitate the removal of chronically absent board members.

While the Division of Corporations, Business and Professional Licensing works with the board and provides advice and guidance, the board is not under the purview of the department. The board will determine how it wishes to proceed with respect to this recommendation. As noted in the preliminary report, board members are appointed by and serve at the pleasure of the Governor.

Recommendation 2: The board should actively work towards updating sedation regulations.

The department feels this recommendation fails to recognize the progress made on this topic. While updated sedation regulations are not finalized, we feel the recommendation as written indicates there was no progress made, which is inaccurate. The board has been working towards updating these regulations, but they are complicated and it is taking time and considerable amount of deliberation. The board established a work group on this topic, and both the department and work group drafted updates, but neither version was satisfactory to move forward. As a result, the board opted to wait until national guidance was updated on this topic to inform the Alaska regulations update.

It's important to note that the regulations that exist now are not outdated, but rather they are unnecessarily complicated and will greatly benefit from an update. However, this finding seems

to penalize the board for identifying where improvements to regulations are necessary (the first step in necessary updates). We feel that an amended version of this recommendation that reflected the progress made would be a better reflection of the board's efforts in this area. If the board has not made progress or updates to these regulations as of the next sunset review, it would be reasonable to include it as a finding then. The department continues to feel that if the recommendation remains, it would be more accurate if amended to read, "The board should **continue to** actively work towards updating sedation regulations."

Recommendation 3: DCBPL's director should ensure board fees are set in accordance with statute or seek a statutory change if deemed necessary.

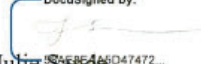
The department agrees with the recommendation to seek a statutory change to remove the requirement for DCCED to collect fees related to dental radiological equipment inspections. The inspections are now under the Department of Health's (DOH) jurisdiction. The current statutory requirement for DCCED to collect these fees would require the department to collect fees, establish a reimbursable services agreement to allow the fees to be transferred, and then transfer the funds to DOH. Currently the spirit of the statute is being met – the owner of the radiological equipment is paying for the inspection of that equipment. Having DOH collect the fees directly, avoids additional costs and inefficiencies that are unnecessary and administratively burdensome for both departments. The only logical solution to address this finding is with a statutory change.

Recommendation 4: DCBPL's director should improve training to help ensure staff properly terminate certificates when related licenses are no longer valid.

The department agrees with this finding, but does not agree with the statement, "perpetual licenses that are not properly terminated increase the risk to public safety." Regardless of whether a dentist or dental hygienist has an active certificate/permit/endorsement that allows them to provide additional services in their professional capacity, they are legally not able to operate in any professional capacity if their primary dentist or dental hygienist license is not active. The department does agree we need to improve training to ensure connected licenses or equivalent are terminated when primary licenses are no longer active, but this is more of a clean-up task versus a risk to public safety. We plan to address this finding by improving training for staff on this topic and adding functionality in our licensing database to provide reminders to staff to terminate related licenses.

Again, thank you for the opportunity for the department to provide input on this matter. If you have any questions, please feel free to contact me.

Sincerely,

DocuSigned by:

 Julie Sande
 Commissioner

cc: Glenn Saviers, Deputy Director, DCBPL, DCCED
 Lizzie Kubitz, Legislative Liaison, DCCED

Agency Response from the Board of Dental Examiners

Dear Alaska Legislative Budget and Audit Committee:

This is the written response to the July 16th, 2026, Confidential Preliminary Report, Department of Commerce, Community, and Economic Development (DCCED), Board of Dental Examiners. I will respond to the recommendations and will state if I agree or disagree with the report's conclusions and recommendations.

Recommendation #1: The board should consider adopting a regulation to facilitate the removal of chronically absent board members.

I agree with this recommendation. Having board members absent time and time again make it hard to have quorum and to run board business. The board will create a regulation to remove board members who have three or more unexcused absences.

Recommendation #2: The board should work towards updating sedation regulations.

I agree with this recommendation. Having a clear sedation regulation should be priority, even with the Governor's administrative Order 360 being at the top of the list. The Dental board has gone through so many changes this recommendation helps get the board back on track.

Recommendation #3: DCBPL's director should ensure board fees are set in accordance with statute or seek a statutory change if deemed necessary.

I agree with half of this recommendation. I think the board needs to seek a statutory change and have the DOH fund the inspections for the radiological equipment. The dental board has no jurisdiction over the equipment and shouldn't fund the inspections.

Recommendation #4: DCBPL's director should improve training to help ensure staff properly terminate certificates when related licenses are no longer valid.

I agree with this recommendation. We need to have the staff properly trained and a way to have the licenses showing multiples so that staff errors are low.

Report Conclusion:

I agree with the report conclusions. The Board of Dental Examiners remain committed to serve the public's interest by ensuring that Dentists and Hygienists maintain the highest standards of professional and ethical practice.

Thank you for the opportunity to respond to the report.

Sincerely,

Christina Hansen RDH-AP, MPH, BAS
Chair, Alaska Board of Dental Examiners



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AUG 10 2026

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Legislative Auditor's Additional Comments

ALASKA STATE LEGISLATURE LEGISLATIVE BUDGET AND AUDIT COMMITTEE Division of Legislative Audit



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August 7, 2026

Members of the Legislative Budget
and Audit Committee:

I have reviewed the commissioner's response to this audit. Nothing contained in the response causes me to revise or reconsider the report conclusions or recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris Curtis".

Kris Curtis, CPA, CISA
Legislative Auditor

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