



Central Regional Dental Testing Service, Inc.

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Dr. Alan Felsenfeld, MA, DDS, President and Members of the Board
Dental Board of California
2005 Evergreen Street, Suite 1550
Sacramento, CA 95815

Dear Dr. Felsenfeld and Members of the Board,

On behalf of Central Regional Dental Testing Services, Inc. (CRDTS), thank you for considering the review of the CRDTS Dental Examination as a pathway to dental licensure in the state of California. We trust that with complete and accurate information regarding the scope of the CRDTS Dental Examination, you will see that it is substantially equivalent to the examinations currently accepted in California.

As a nationally recognized Licensure Examination Agency, CRDTS has been developing and administering fair and reliable examinations for candidates wishing to practice in the dental field for more than 50 years. Our national examinations are recognized and accepted in over 40 states nationwide (and growing), including California's bordering states of Oregon and Arizona. Significantly, the examinations administered by CRDTS and ADEX are very similar in content and scoring, were developed by the same group of professionals, and cover the components required by state dental boards across the nation.

The CRDTS Dental Examination is comprised of the following components:

- **Part I: Diagnosis and Comprehensive Treatment Planning Written Examination**
- **Part II: Endodontics Examination**
- **Part III: Prosthodontics Examination**
- **Part IV: Periodontal Examination**
- **Part V: Restorative Examination**

Worthy of note, the CRDTS Periodontal Examination examination, which is a required component, consists of Extra and Intra Oral examination OSCE, calculus detection, and periodontal measurements (40% diagnosis) and scaling and root planing (60% scaling). The ADEX examination only has an *optional* Periodontal Scaling Examination with NO Psychomotor Diagnosis, per the CDCA Manual.

While dentists in private practice may have hygienists perform scaling and root planing, the dentist is responsible for 100% of periodontal diagnosis in private practice. Certainly, periodontal diagnosis is critical to establishing a global comprehensive oral diagnosis, and failure to diagnose periodontal disease can have major implications as an uncontrolled risk factor in systemic health.

Additionally, while CDCA has trademarked their typodont tooth and markets it as the CompoDont, all licensure exam typodonts are currently produced by the same manufacturer, Acadental. While CRDTS has not trademarked the teeth used in the simulated patient exams, the quality of the typodonts and teeth have been evaluated and improved each year since the development of the simulated patient exam even prior to the Covid pandemic that expedited the use of simulated patient examinations in many states across the country.

Furthermore, CRDTS' examinations are developed and enhanced together with our Member State Boards. Through our Dental Examination Review Committee and our governing body, the Steering Committee, CRDTS Members have a voice in the structure of the dental examination and any changes and enhancements that are implemented.

Finally, with the merger of the CDCA, WREB and CITA testing agencies, there is a dangerous trend toward a monopoly in the dental testing industry. We hope you, as board members, can agree that a monopoly creates a burden for the State Dental Boards and the consumers alike. Without competition, it is difficult to control costs, quality and accountability. Thus, CRDTS believes it is imperative that California join the majority of the country in accepting the CRDTS National Clinical Competency Dental Examination as a pathway toward dental licensure in the State of California.

Thank you for your consideration of this matter.

Respectfully,

Sam Jacoby, DDS, President

Sam Jacoby, DDS, President
CRDTS, Inc.

Richael L. Cobler

Richael L. Cobler, Executive Director
CRDTS, Inc.