To: Attorney General Liz Murrill

 Attn: Department of Justice, Occupational Licensing Review Program

From: Mr. Arthur Hickham

 Executive Director, Louisiana State Board of Dentistry

Date: October 9, 2025

Subject: Rules .1709, .1711& .1713

The Louisiana State Board of Dentistry has proposed to amend LAC 46:XXXIII.1709, .1711& .1713:

LAC 46:XXXIII.1709 “Examination of Dentists” – The Louisiana State Board of Dentistry is amending this rule to specify the Board now only accepts ADEX for initial licensure by examination for dentists. The Louisiana State Board of Dentistry is amending this rule because it is unnecessary language. This rule change has no substantive effect

LAC 46:XXXIII.1711 “Examination of Dental Hygienists” – The Louisiana State Board of Dentistry is amending this rule to specify that for dental hygienists the Board now only accepts ADEX for initial licensure by examination for dental hygienists. The Louisiana State Board of Dentistry is amending this rule because it is unnecessary language. This rule change has no substantive effect

LAC 46:XXXIII.1713 “Board Approved Regional or National Independent Third Party Clinical Examinations” – The Louisiana State Board of Dentistry is repealing this rule because it is unnecessary language. This rule change has no substantive effect.

Include if Applicable: The Louisiana State Board of Dentistry requests an expedited review of the proposed rule based on the following circumstances: [Explain]. N/A

To facilitate the Department of Justice’s review of the proposed rule, Louisiana State Board of Dentistry provides answers to the following questions.

1. Describe any relevant factual background to the occupational regulation and the purpose of the occupational regulation?

a. The Dental Board is charged with assuring that licensees are qualified to practice in this state. One of the methods to accomplish this is through a licensing examination. The Dental Board accepts the ADEX examinations (one for dentists and a separate one for hygienists) as the licensing examination for this state.

2. Is the occupational regulation within the scope of the occupational licensing board’s general authority to regulate in a given occupation or industry? If so, identify the law that provides the authority for the rule and describe how the occupational regulation is within the scope.

 La. R.S. 37:751 et seq.

3. Check all of the following that apply as reasons the occupational regulation is subject to review

[] Creates a barrier to market competition

[] Fixes prices, limits price competition, or results in high prices for a product or service provided by or to a license holder.

[] Reduces competition or excludes present or potential competitors from the occupation regulated by the board

[] Limits output or supply in this state of any good or service provided by the members of the regulated occupation.

[] Reduces the number of providers that can serve a particular set of customers

[] Other activity (please describe)

**None of these rule changes fit any of this criteria.**

4. Identify the clearly articulated state policy (e.g., health, safety, welfare, or consumer protection) in state statute, or any supporting evidence of the harm the action/proposed action is intended to protect against?

The protection of dental patients.

5. Do any less restrictive alternatives to the occupational regulation exist for addressing the same harm? If so, include a comparison of the occupational regulation to the alternatives and a justification for not pursuing a less restrictive alternative. If no less restrictive alternatives exist, explain why.

No

6. Describe the process that the occupational licensing board followed in developing the proposed rule, including any public hearings held, studies conducted, and data collected or analyzed.

The Board is simply fixing redundant language. No substantive changes were made.

7. Does the occupational regulation relate to a matter on which there is pending litigation or a final court order?

No.

8. Please identify the board members voting in favor of this rule, and state whether the member is an active market participant.

All Board members voted in favor of these changes; all except one consumer member are active market participants.

9. Is there anything else that the occupational licensing board would like the Department to know about the proposed rule?