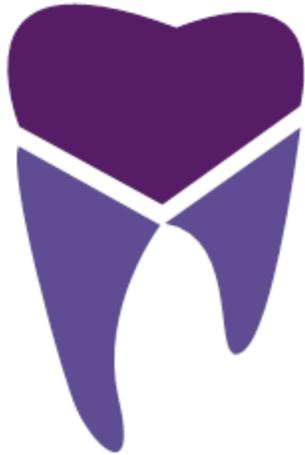


# DHBC

Dental Hygiene  
Board of California

**Friday and Saturday, March 27-28, 2025  
DHBC Board Meeting Materials Addendum 2  
(Full Board and Committees)**





# DHBC

Dental Hygiene  
Board of California

## **March 27-28, 2026, Board Meeting Materials Addendum 2**

### **Content:**

- 1) EDU Agenda Item 5: Response Letter from Subject Matter Expert JoAnn Galliano MEd, RDH, Regarding the March 5, 2026, Letter from Cabrillo College President Dr. Jen Capps.
- 2) EDU Agenda Item 6: Dental Hygiene Educational Program Site Visit Update and Schedule.
- 3) LEG REG Agenda Item 4: Catherine K. Draper RDH, MS, FADHA, Letter addressing Assembly Bill 1952 (Berman) Dentistry: dental hygienists: licensure.



**Friday, March 27, 2026**

**Dental Hygiene Board of California**

**Education Committee Agenda Item 5.**

**Response Letter from  
Subject Matter Expert JoAnn Galliano MEd, RDH,  
Regarding the March 5, 2026, Letter from  
Cabrillo College President Dr. Jen Capps.**

## **STAFF RESPONSE TO CABRILLO LETTER DATED MARCH 5, 2026**

Dr. Adina Pineschi-Petty and I, the Subject Matter Expert (SME) JoAnn Galliano MEd.,RDH, conducted an unannounced site visit at Cabrillo College Thursday February 12th. The site visit was in response to a complaint filed with the DHBC. Dr. Pineschi-Petty mailed the summary of the findings with documentation of the violations observed, the supporting evidence and dates for compliance to the college President, Dr. Jen Capps on February 18<sup>th</sup>. On March 5<sup>th</sup>, Dr. Capps mailed the college's response.

As the SME present for the site visit, I have concerns regarding the accusations made in the letter, the disregard for the evidence provided through discussions with the program director and faculty, and the intent to file a formal complaint against Dr. Pineschi-Petty. The intent of this report is to address those concerns.

### **Accusation 1:**

“We have spent no less than 40 hours reviewing a drafting a response to the **unreasonable and unfounded allegations of violations** that Dr. Pineschi-Petty has set out in her letter.”

Having been a participant in all the discussions with the program director and faculty, the validity of the complaints filed leading to citing of the violations outlined in the letter from Dr. Pineschi-Petty were substantiated. As with the letter received by the DHBC, I will provide the complaint, address each of the violations and provide evidence to support non-compliance with the laws and regulations pertaining to dental hygiene educational programs and the Commission on Dental Accreditation Standards (CODA).

### **Violation 1: Inadequate Clinic Supervision (Faculty to Student Ratios).**

The unannounced site visit was prompted by a complaint from faculty that the clinic is repeatedly understaffed by faculty, resulting in student ratios often being out of compliance with DHBC and CODA standards.

The college contends that “The site visit observation of a 1:7 ratio occurred **only on one day...**”. The complaint from faculty was received prior to the site visit. Therefore, this had to have occurred more than one day. The fact that it occurred on the day of an unannounced site visit supports the complaint and warrants a citation of a violation. Faculty indicated this was an ongoing issue due to the lack of faculty or substitutes willing to work for the substitute fee (which is approximately half of the normal pay scale for clinical faculty) and the lack of full time faculty to provide coverage. The complaint stated the program director was often not available to substitute to remedy the faculty to student ratio. The program director is the only full-time faculty appointment, and due to scheduling constraints was unavailable this day to cover the

ratio deficiency, is evidence supporting the complaint and the subsequent violation. The college further admitted the “ratio was out of compliance for 75 minutes on this particular day...”. During this time, students lacked adequate supervision to oversee provision of patient care.

### **Violation 2: Inadequate Student Clinical Hours**

The complaint stated that students are not held accountable if they do not have a patient for the clinical session (“empty chair”) and on average only 10 of 20 students have clinic patients during a clinic session. Upon request, the faculty provided the “empty chair” data for the previous semester. This data was included in the letter to the college from Dr. Pineschi-Petty. The clinical course syllabi was reviewed. The syllabi clearly states once a student has three (3) empty chairs, the student must make an appointment with the clinic coordinator, and the remediation process will be initiated. Twenty of the twenty students had three or more empty chairs with no remediation or subsequent consequences.

Faculty indicated that due to lack of enforcement of an empty chair policy, students took no responsibility for lack of patient care hours.

The college contends the letter from the DHBC failed to provide the name of a single student who advanced without meeting the clinical hours requirement. As stated above, the data was provided by faculty indicating 20 students were missing 12-44 hours of patient care due to empty chairs. All 20 students were advanced to the next clinical course. Names were not provided on the document as this would be a violation of CODA and the DHBC’s policy regarding students right to privacy.

The college further contends the “existing empty chair policy is **punitive in nature, as students lose points when their assigned chair is unfilled.** In alignment with our commitment to fostering a supportive and engaging learning environment, the Dean and Director determined that students should not be penalized for circumstances beyond their control.”

In conversations with the Director and in the complaint from faculty, the Dean would not allow the program to enforce the existing empty chair policy or to allow faculty to employ the remediation policy stated in the course syllabi. This is substantiated by the statement from the college stated above. With no enforcement of the empty chair policy, students are allowed to progress missing 12-44 hours of patient care providing evidence to support the violation.

### **Violation 3: Student Competency**

The complaint indicated that students were progressing to successive clinical courses without completing required course competencies and requirements.

The college in their response stated that “seven students were given incomplete grades and subsequently entered into a contract with the instructor of record to complete the required competencies.”

This statement does substantiate the complaint that students are allowed to progress without completing requirements. During this site visit, faculty did state there was pressure from the Dean to not make grade adjustments or fail students due to missing competencies or requirements and to pass students on to successive clinical courses. The college document further states “A student cannot enroll in a future course if they have not passed the current course. All seven students cited in the complaint received ‘Incomplete’ grades.” No clear explanation was provided as to whether a student could progress with a grade of incomplete.

#### **Violation 4: Program Director Assignment and Authority**

Complaint states the program director resides in Southern California and states the program director is not consistently on campus and lacks availability to students and faculty.

Upon arrival for the site visit, the program director was not on campus. Reportedly she was at an off-campus meeting. In discussion with the program director, the program director asserted that she was on campus more hours than required by contract. Unfortunately, due to the fact she is the only full-time faculty with teaching responsibilities and overseeing the operations of the program, she would be on campus more hours than required contractually. With no other full-time support, faculty depends on the program director to be available to provide clinical support that would in other dental hygiene programs be shared with full time faculty.

The program director’s workload at the time of the site visit was not in compliance with the law. Only 8 units of her contracted 17.45 load were allocated to program director responsibilities and 9.75 were dedicated to teaching.

Both faculty and the program director expressed concerns about the lack of program autonomy due to the Dean. The director and the faculty expressed frustration with the amount of control the Dean had over the program. In a review of documents provided regarding faculty in service, the Dean took responsibility for setting the agenda and directing the flow of the meeting. Faculty was concerned about the lack of authority the program director had in areas of program policies as well as student and faculty concerns.

Due to the issues raised in the complaint and the dialogue with faculty and the program director, it was clear Cabrillo was not in compliance with requirements for the program director to have the primary authority to oversee the dental hygiene program.

### **Violation 5: Faculty Support**

Lack of an additional full-time faculty member has contributed to the lack of available coverage due to absences of clinical faculty leading to complaints of inadequate coverage in clinic. The current clinical lead instructor is only part time. The clinic is staffed primarily by part time faculty. The college asserts the current number of staff members is sufficient to support the enrollment pattern of 20 students per year. According to the letter from the college, the district strongly believes that one full-time faculty director and thirteen associate faculty members are sufficient. During the site visit, it was clear from faculty and the program director that this is not the case. Part time faculty do not have the same responsibilities or workload as full time faculty. Part time faculty is not available to cover for other part time faculty as was observed at the site visit. The clinical lead was not scheduled to on campus on the day of the site visit. In order to address the complaints, the clinical lead was asked to come to campus to meet with us. She did comply with the request on her own personal time.

Requiring the program director to oversee the program, work with faculty, teach and be responsible for the daily operations of the clinic is not working. With a fully operational clinic, 20 students, patients and clinical faculty an additional full-time faculty position is supported.

### **Violation 6 Staff Support:**

The letter from the college indicates that the lack of sterilization coverage was due to the instructional technician working a compressed work week. It was unclear at the time of the site visit that the instructional assistant was responsible for sterilization monitoring. According to the complaint and faculty discussion it was unclear if the instructional technician was responsible for overseeing students in sterilization. Faculty indicated that they were responsible for overseeing sterilization when students were in the sterilization area. Clarification is needed to determine whether the program has adequate staff support.

### **Violation 7 Student Resources**

The letter from the college questions the authority of the DHBC to require the dental hygiene program to pay for personal protective items (PPE) such as masks and gloves. The Education Code cited by the DHBC has been applied to community colleges along with the following language from Title 5.

Title 5 CCR §59400-59408 provides the law governing the ability of a community college to require students to pay for instructional materials such as gloves and masks. The law states:

#### **§ 59400. Required Instructional Materials.**

(a) The governing board of a district may, consistent with the provisions of this subchapter, require students to provide instructional materials required for a credit or noncredit course,

**provided that such materials are of continuing value to a student outside of the classroom setting...**

Requiring students to pay for materials required for use in a class is restricted to those items which could be used outside of the clinical setting (classroom). Gloves and masks are onetime use items that could only be used in the clinical setting and discarded. Therefore, the college is required to pay for masks and gloves used in clinic.

### **Violation 8: Renewal of DHBC Concerns Regarding Stable Financial Resources**

During the course of the site visit, it was noted that the program lacks full-time faculty, and adequate support staff as well as requiring students to pay for gloves, masks and competency forms. In addition, the program is still providing continuing education courses to supplement the program budget. This would indicate budget revisions need to be made to support program needs. The DHBC would need to revisit the financial resources available to support the full-time position, staffing needs and the costs of supplying students with masks and gloves.

### **Accusations and Threats**

In two of the final three paragraphs of the letter from Cabrillo College, the President states the intent of the college is to file a formal complaint against Dr. Pineschi-Petty for “attempting to impose sanctions on our employees and institution that are disruptive to our program...” The letter further alleges “Dr. Petty has continually targeted Cabrillo College...” and is “continually alleging frivolous and unfounded claims of violations that harm our program and the moral of our employees. Dr. Petty has directly threatened our dental hygienists, insisting she will have their licenses revoked.”

As the SME for this board since 2008, I have worked with Dr. Pineschi-Petty conducting site visits to all of the 28 dental hygiene programs. It has been the goal of Dr. Pineschi-Petty and myself to assist all the dental hygiene programs in ensuring consumer protection, adherence to all applicable laws and CODA Standards. To threaten Dr. Pineschi-Petty with the filing of a formal complaint because she is doing her job is unwarranted.

Since 2019, Cabrillo College has had 5 site visits. The first was the standard site visit conducted after Cabrillo College had their CODA Site Visit. The additional four site visits have been conducted as a result of complaints received from faculty and students. With each visit, the complaints have been investigated, substantiated and reported to the Board.

Dr. Pineschi-Petty has always maintained a high level of professionalism. To state that she threatened dental hygienists with licensure revocation is completely unfounded. At no point during the site visit was there a contentious atmosphere with any of the dental hygiene faculty that would warrant such a claim.

In summary, for Cabrillo College to state the violations cited in the letter from the DHBC, were **“unreasonable and unfounded allegations...”** is not supported by the evidence obtained as a result of the unannounced visit conducted by Dr. Pineschi-Petty and myself.



**Friday, March 27, 2026**

**Dental Hygiene Board of California**

**Education Committee Agenda Item 6.**

**Dental Hygiene Educational Program  
Site Visit Update and Schedule.**



## MEMORANDUM

<b>DATE</b>	March 27, 2026
<b>TO</b>	Education Committee Dental Hygiene Board of California
<b>FROM</b>	Adina A. Pineschi-Petty DDS Education, Legislative, and Regulatory Specialist
<b>SUBJECT</b>	<b>EDU 6: Dental Hygiene Educational Program Site Visit Update and Schedule.</b>

### 1. Pasadena City College (PCC)

- a. Site visit generated due to a change in administration for PCC, as well as a part of the Dental Hygiene Board of California's (DHBC, Board) oversight goals to monitor all dental hygiene educational programs (DHEPs) in California.
- b. On October 12, 2022, a site visit was conducted at the PCC campus.
- c. At the July 20, 2024, Full Board meeting, the Board voted to issue a citation and placed PCC on two (2) years' probation with quarterly reporting requirements.
- d. PCC requested an Informal Conference with the DHBC's Executive Officer (EO) pursuant to California Code of Regulations (CCR), Title 16, section 1104.3(b)(5)(B) regarding their citation and probationary status.
- e. On September 17, 2024, EO Lum held PCC's Informal Conference where he dismissed the citation but maintained the Board's action of placing PCC on probation for two (2) years with reporting requirements from the date of notification (August 16, 2024).
- f. On August 25, 2025, PCC provided a quarterly report stating:

"PCC received the Division of the State Architect (DSA) approval of the proposed Dental Hygiene clinic renovations on July 24, 2025. As the approval came too late to start the remodeling, this made the completion of the planned remodeling impossible.

The current plan is to complete the renovations of the Pasadena City College Dental Hygiene Clinic during the conclusion of the Spring 2026 term (June 5, 2026) with the renovated clinic being available for occupancy in Fall 2026 (August 24, 2026). Until that time the program will continue to use the existing clinic space, with the temporary modifications approved by the Dental Hygiene Board of California. The Program also

will utilize the previously submitted Temporary Change of Course Sequence (December 10, 2024) for the 2025-26 Academic Year.”

- i. See current quarterly report.
- g. A site visit was completed on January 28, 2026.
- h. Current Status:
  - i. In temporary compliance.
  - ii. See site visit report.

## **2. Taft College (Taft)**

- a. Site Visit was generated due to a CODA Self Study review, as well as a part of the DHBC oversight goals to monitor all DHEPs in California.
- b. On February 20-21, 2024, a site visit was conducted at the Taft campus.
- c. At the July 20, 2024, Full Board meeting, the Board voted to issue a citation and fine of \$2,000 (\$1,000 each for 2022 & 2023 students who graduated without fulfilling Taft’s established requirements to graduate from the Taft dental hygiene program) and placed Taft on probation for three (3) years with quarterly reporting requirements.
- d. Taft requested an Informal Conference with the DHBC’s Executive Officer pursuant to 16 CCR section 1104.3(b)(5)(B) regarding their citation, fine, and probationary status.
- e. On September 19, 2024, EO Lum held Taft’s Informal Conference where he affirmed the Board’s decision (as detailed above) where the Board issued Taft a citation and fine (\$2,000) and placed Taft on probation for three (3) years from the date of notification (August 15, 2024). Taft College paid the fine and is currently on probation for three (3) years from the August 2024 date.
- f. Current Status:
  - i. In compliance.
  - ii. See current quarterly report.

### 3. Concorde Career College-San Diego (CCC-SD)

- a. Site visit generated due to a change in in administration for CCC-SD, a follow-up due to remodel and enrollment increase request, as well as a part of the DHBC oversight goals to monitor all DHEPs in California.
- b. On October 15, 2024, a site visit was conducted at the CCC-SD campus.
- c. On November 14, 2024, CCC-SD provided a response to the violations. Violations 1, 3, 4, 5, 6, and 7 were determined as in compliance, with Violation 2 remaining.
  - i. Violation 1 regarding tabled citation and fine from November 2024 meeting was remediated and now in compliance.
- d. On January 16, 2025, CCC-SD provided a response to the remaining Violation 2.
- e. Current Status:
  - i. In compliance.
  - ii. Compliance regarding CCC-SD to comply with the laws regarding the program's instructional length to be a minimum of ten (10) weeks, excluding final exams, began on **February 2, 2026**.

### 4. Cerritos College (Cerritos)

- a. Site visit generated due to a CODA Self Study review, a change in administration for Cerritos, as well as part of the DHBC oversight goals to monitor all DHEPs in California.
- b. On December 2, 2024, a site visit was conducted at the Cerritos campus.
- c. Current Status:
  - i. In temporary compliance.
    - 1. Permanent compliance **due June 1, 2026**.

### 5. Concorde Career College-Garden Grove (CCC-GG)

- a. Site visit generated due to a change in in administration for CCC-GG, as well as a part of the DHBC oversight goals to monitor all DHEPs in California.
- b. On December 3, 2024, a site visit was conducted at the CCC-GG campus.

- c. On January 17, 2025, CCC-GG provided a response to the violations. Violation 2, Violation 3(a)(1)(iii), Violation 4, Violation 5, Issue 2, and Violation 6 were determined as in compliance; with Violation 1 not in compliance, and Violation 3(a)(1)(i and ii) and Violation 5, Issue 1 in temporary compliance with a due date for permanent compliance of July 1, 2025.
- d. On June 25, 2025, CCC-GG provided a response to the remaining violations.
- e. Current Status:
  - i. In compliance.
  - ii. Compliance regarding CCC-GG to comply with the laws regarding the program's instructional length to be a minimum of ten (10) weeks, excluding final exams, began on **February 2, 2026**.

## **6. Concorde Career College-San Bernardino (CCC-SB)**

- a. On February 24, 2025, an announced site visit was conducted due to complaints received by the Board.
- b. Current Status:
  - i. In compliance.
  - ii. Compliance regarding CCC-SB to comply with the laws regarding the program's instructional length to be a minimum of ten (10) weeks, excluding final exams, began on **February 2, 2026**.

## **7. Diablo Valley College (DVC)**

- a. Site visit generated due to a CODA Self Study review as well as a part of the DHBC oversight goals to monitor all DHEPs in California.
- b. On October 14, 2025, a site visit was conducted at the DVC campus.
- c. On October 31, 2025, December 5, 2025, and December 19, 2025, DVC provided responses to the violations discovered by the Board.
- d. Current Status:
  - i. Not in compliance.
  - ii. See DVC report.

**8. Cabrillo College (Cabrillo)**

- a. On February 12, 2026, an unannounced site visit was conducted due to complaints received by the Board, as well as due to appointment of a new program director.
- b. Current Status:
  - i. Not in compliance.
  - ii. See Cabrillo report in “Education Committee Agenda Item 5.”

**DHBC DHEP SITE VISIT SCHEDULE**

<b>RDH Educational Program</b>	<b>CODA Visit Previous/Next Scheduled</b>	<b>DHBC Visit(s) Previous/Next Scheduled</b>
Cabrillo College	2019 / <b>2027</b>	November 7, 2019 April 9, 2024 August 8, 2024 October 8, 2024 (Complaint.) <b>February 12, 2026 [Complaint and new Program Director (PD).]</b>
Carrington College (formerly San Joaquin Valley College) - Ontario	2022 / 2029	June 24, 2021
Carrington College - Sacramento	2021 / 2028	February 10, 2021 March 8, 2023 (Limited.) February 12, 2024 (Complaint.) May 29, 2024 (Complaint.) September 30, 2024 (New PD.) <b>TBD (New PD.)</b>
Carrington College - San Jose	2021 / 2028	October 25, 2017 November 16, 2020 March 1, 2023 (Limited.) February 12, 2025
Carrington College (formerly San Joaquin Valley College) - Visalia	2019 / <b>August 31, 2027-September 1, 2027</b>	November 14, 2019
Cerritos College	2016 / 2031	February 15, 2017 December 2, 2024
Chabot College	2023 / 2030	September 8, 2021 May 2, 2023
Concorde Career College-Garden Grove	2019 / <b>2027</b>	June 28, 2016 August 10, 2016 December 7, 2016 January 18, 2018

<b>RDH Educational Program</b>	<b>CODA Visit Previous/Next Scheduled</b>	<b>DHBC Visit(s) Previous/Next Scheduled</b>
		June 29, 2022 (Limited.) December 3, 2024 <b>TBD (New PD.)</b>
Concorde Career College- San Bernardino	2018 / <b>February 17-18, 2026</b>	December 20, 2016 January 19, 2018 June 28, 2022 (Limited.) February 24, 2025 (Complaint.)
Concorde Career College- San Diego	2021/ 2028	December 19, 2016 May 27, 2021 October 15, 2024
Cypress College	2015 / 2030	March 3, 2020 October 12, 2023
Diablo Valley College	2017 / 2032	February 26, 2019 October 14, 2025 (Self Study.)
Foothill College	2018 / <b>June 9-11, 2026</b>	October 18, 2018 <b>November 5, 2026</b> <b>(Self Study and new PD.)</b>
Fresno City College	2021 / 2028	October 27, 2021
Loma Linda University	2016 / 2031	October 13, 2022 October 10, 2023
Moreno Valley College	2019 / <b>2027</b>	May 30, 2017 October 11, 2023
Oxnard College	2021 / 2028	November 4, 2021
Pasadena City College	2016 / 2031	October 12, 2022 January 28, 2026
Sacramento City College	2018 / <b>December 1-3, 2026</b>	December 7, 2018 <b>December 7, 2026</b>
Santa Rosa Junior College	2023 / 2030	September 16, 2021
Shasta College	2023 / 2030	March 12, 2018 March 23, 2021
Southwestern College	2023 / 2030	September 22, 2021
Taft College	2016 / 2031	May 8, 2017(Complaint.) May 15, 2017 June 9, 2017 July 24, 2017 February 20-21, 2024 May 13-14, 2024
University of the Pacific	2022 / 2029	February 13, 2020
West Coast University	2017 / 2032	September 15, 2022 September 29, 2025 (Self Study.)
West Los Angeles College	2017 / 2032	October 30, 2018 February 25, 2025 (Self Study.)



**Friday, March 27, 2026**

**Dental Hygiene Board of California**

**Legislation and Regulatory Committee Agenda Item 4.**

**Catherine K. Draper RDH, MS, FADHA, Letter addressing  
Assembly Bill 1952 (Berman)  
Dentistry: dental hygienists: licensure.**

**CATHERINE K. DRAPER**

1310 Regency Drive, San Jose, CA 95129 | 408-315-2694 | [drapercatherine@fhda.edu](mailto:drapercatherine@fhda.edu)

March 10, 2026

Dear Assemblyman Berman,

I am writing you as a registered dental hygienist, faculty member at Foothill College and one of your constituents, I want to express my strong opposition to AB1952, that would create a streamlined pathway for dental hygiene licensure for international dentists.

While I, like the California Dental Hygienists Association and the American Dental Hygienists' Association, support thoughtful solutions to grow and strengthen the oral health care workforce, AB 1952 takes the wrong approach.

As you know, dental hygienists are licensed and regulated by the Dental Hygiene Board of California (DHBC). Unlike other states across the country, the dental hygiene profession is fully self-regulated here in California. As written, AB1952 would require the DHBC to oversee and regulate a licensure pathway for internationally trained dentists. These foreign trained oral health care providers have received their education and training in countries where their scope of practice is fundamentally different from that of a dental hygienist. Dental hygiene education is not comparable to dental education nor is foreign dental education equivalent to dental hygiene education curriculum or clinical standards in California.

As written, AB1952 considers internationally trained dentists to have the equivalent education of a dental hygienist. Our dental hygiene education program standards focus on clinical assessments, preventive care, periodontal therapy, patient education, and principles of public health. Requirements for dental hygiene licensure include graduating from a Commission on Dental Accreditation dental hygiene program among other stringent clinical requirements. Allowing for international training to be considered as the equivalent of dental hygiene education creates uneven standards of preparation, weakens licensure integrity and will ultimately impact the safety and quality of care provided to the public.

The role both the Dental and the DHBC is to protect California's consumers. The Dental Board is responsible for licensing dentists, regardless of whether they were trained in the United States or

internationally. Under AB1952 the cost of developing, administering and regulating a new licensure pathway for international dentists would fall under the DHBC, with these additional administrative costs borne by the current licentiates through increased fees. If the goal is to provide more opportunities for foreign trained dentists, the Dental Board could consider creating and overseeing a restricted dental license while working towards full licensure.

There are oral health care provider workforce challenges across the country. However, California currently graduates ~ 800 dental hygienists a year. Workforce challenges are influenced by regional cost of living issues, part-time positions, workplace culture and lack of benefits. We must all work together to find better solutions to these ongoing challenges.

Thank you for considering my position on AB1952.

Sincerely,

*Catherine K. Draper, RDH, MS, FADHA*

**Catherine K. Draper, Foothill College faculty  
Editor in Chief, Journal of Dental Hygiene**