Regulatory Analysis

Notice of Intended Action to be published: 481—Chapters 572, 574, 575, 577, and 581
"Practical Training for Dental Assistants"

Iowa Code section(s) or chapter(s) authorizing rulemaking: 147, 153 and 272C

State or federal law(s) implemented by the rulemaking: 2025 Iowa Acts, House File 805, and Iowa Code chapters 147, 153 and 272C

Public Hearing

A public hearing at which persons may present their views orally or in writing will be held as follows:

October 7, 2025	6200 Park Avenue
9 a.m.	Des Moines, Iowa

Public Comment

Any interested person may submit written or oral comments concerning this Regulatory Analysis, which must be received by the Iowa Dental Board no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

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Purpose and Summary

This proposed rulemaking amends the rules promulgated by the Board to implement 2025 Iowa Acts, House File 805. This legislation allows for dental assistants to practice in Iowa without a requirement to be registered if they complete a term of practical training as set forth in rule and Iowa Code chapter 153.

All references to Iowa Code chapters 147 and 153 and section 153.39 herein are to those chapters and that section as amended by 2025 Iowa Acts, House File 805.

Analysis of Impact

1. **Persons affected by the proposed rulemaking:**

- **Classes of persons that will bear the costs of the proposed rulemaking:**

There are no anticipated costs with this proposed rulemaking, other than the costs already incurred by the Board to enforce the rules. A licensed dentist may incur costs in training a dental assistant in the dentist's office should the dentist decide to utilize the practical training program.

- **Classes of persons that will benefit from the proposed rulemaking:**

This proposed rulemaking allows an additional pathway to becoming a dental assistant in Iowa. Dental assistants will be able to work without the need to be registered.

2. **Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:**

- **Quantitative description of impact:**

Members of the public would incur no costs other than payment/copayment for dental services provided. Dental assistants would be responsible for the training necessary to be certified for expanded functions and radiography.

- **Qualitative description of impact:**

The Board believes that the costs are justified by the benefits achieved because the proposed rules allow a dental assistant to practice without the requirement of being registered or completing schooling or examinations, so long as the dental assistant meets the requirements of these rules and completes the practical training term. This will allow for more dental assistants to join the profession and a quicker entry into the profession.

3. **Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

Costs to the agency are for the staff time needed to manage Board activities, including oversight of practice standards and requirements. The Board would still need to review and approve training for expanded functions and radiography; however, the Board does not anticipate any further costs than are already incurred. The time needed to manage this provision is generally in the form of responding to questions related to practice standards and processing requests for review of expanded functions training. Staff salaries to support the work of the Board are covered by the Licensing and Regulation Fund established in 2023 Iowa Acts, Senate File 557.

- **Anticipated effect on State revenues:**

This proposed rulemaking has no anticipated impact on State revenues. Staff salaries to support the work of the Board are covered by the Licensing and Regulation Fund established in 2023 Iowa Acts, Senate File 557. Licensing fees go to the fund to cover the operations of the regulated professional licensing boards.

4. **Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

The Board is required by 2025 Iowa Acts, House File 805, to implement these rules.

5. **Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

The Board is required by 2025 Iowa Acts, House File 805, to implement these rules. The Board does not believe there is a less costly or less intrusive method to achieve the purpose of this proposed rulemaking.

6. **Alternative methods considered by the agency:**

- **Description of any alternative methods that were seriously considered by the agency:**

The Board is required by 2025 Iowa Acts, House File 805, to implement these rules. The Board has not identified any alternative methods to carry out this proposed rulemaking.

- **Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

The Board is required by 2025 Iowa Acts, House File 805, to implement these rules. The Board has not identified any alternative methods to carry out this proposed rulemaking.

Small Business Impact

If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:

- Establish less stringent compliance or reporting requirements in the rulemaking for small business.
- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.
- Consolidate or simplify the rulemaking's compliance or reporting requirements for small business.

- Establish performance standards to replace design or operational standards in the rulemaking for small business.
- Exempt small business from any or all requirements of the rulemaking.

If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?

These proposed rules relate to public safety concerns that are present whether the business is a small business or a large corporation. While some dental professionals may work in a smaller dental office, some also work for large corporations, hospitals, and other dental facilities. To exempt small businesses from adhering to this chapter would jeopardize any member of the public who sought services from that small business. The risk to the public is greater than the potential harm or cost to the small business.

Text of Proposed Rulemaking

ITEM 1. Amend subrule 572.6(1) as follows:

572.6(1) Applicants for a radiography qualification must also be ~~registered as~~ a dental assistant pursuant to Iowa Code chapter 153 or hold an active license issued by the board of nursing.

ITEM 2. Amend rule 481—574.1(153) as follows:

481—574.1(153) Licensed ~~or registered~~ personnel. In accordance with Iowa Code chapters 147 and 153, persons engaged in the practice of dentistry, dental hygiene or dental assisting in Iowa must be licensed by the board as a dentist or dental hygienist or ~~registered~~ trained pursuant to Iowa Code chapter 153 as a dental assistant.

This rule is intended to implement Iowa Code chapters 147 and 153.

ITEM 3. Amend subrules 574.4(1) and 574.4(2) as follows:

574.4(1) *Child and dependent adult abuse training.* Licensees or ~~registrants~~ dental assistants who regularly examine, attend, counsel or treat children or adults in Iowa must obtain mandatory training in child and dependent adult abuse identification and reporting in accordance with Iowa Code sections 232.69 and 235B.16 and 481—Chapter 573.

574.4(2) *Cardiopulmonary resuscitation.* Licensees and ~~registrants~~ dental assistants may practice in Iowa if they obtain and maintain current certification in a cardiopulmonary resuscitation (CPR) course that included a hands-on component. The board reserves the right to request that licensees and registrants provide evidence of current certification.

ITEM 4. Amend rule 481—575.1(153) as follows:

481—575.1(153) Registration required. A person shall not practice dental assisting without a current registration issued by the board pursuant to rule 481—571.5(147,153). The following individuals are exempt from the requirements of this rule:

575.1(1) Students enrolled in an accredited dental, dental hygiene, or dental assisting program;

575.1(2) Dental assistant trainees who are meeting the requirements for registration pursuant to Iowa Code section 153.39; ~~and~~

575.1(3) Persons who are actively licensed in Iowa to practice dental hygiene or nursing and who are engaged in the practice of said profession~~.~~; and

575.1(4) Persons who successfully completed a three-month term of practical training under the supervision of a dentist pursuant to Iowa Code section 153.39(5).

ITEM 5. Amend rule 481—575.3(153) as follows:

481—575.3(153) Dental assistants.

575.3(1) Dental assistant trainees are individuals who are engaging in on-the-job training to meet the requirements for ~~registration~~ dental assistants pursuant to Iowa Code section 153.39 and rule

481—571.5(147,153). Trainees who are 18 years of age or older may also engage in on-the-job training in dental radiography pursuant to Iowa Code chapters 136C and 153 and this chapter.

a. Dental assistant trainees should successfully complete on-the-job training and examinations in the areas of infection control, hazardous materials, and jurisprudence.

b. A dental assistant trainee shall stop work as a dental assistant trainee if the trainee fails to become registered or complete the term of practical training described in Iowa Code section 153.39(5) prior to the expiration date.

575.3(2) Registered dental assistants are individuals who have met the requirements for registration and have been issued registration. A registered dental assistant may, under direct supervision, assist a dentist in performing duties assigned by the dentist that are consistent with these rules. A registered dental assistant may take radiographs if qualified pursuant to this chapter.

575.3(3) Persons may practice as a dental assistant without receiving a certificate of registration as described in Iowa Code section 153.39 if the person successfully completes a term of practical training under the supervision of a licensed dentist.

ITEM 6. Amend subrule 575.5(1), introductory paragraph, as follows:

575.5(1) A licensed dentist may delegate the following services to a ~~registered~~ dental assistant under general supervision:

ITEM 7. Amend subrule 577.1(1), introductory paragraph, as follows:

577.1(1) Dental hygienists or ~~registered~~ dental assistants may only perform expanded function procedures upon successful completion of a board-approved course of training. Dental assistant trainees are not eligible to receive training in or perform expanded function procedures.

ITEM 8. Amend subrule 577.1(3) as follows:

577.1(3) To be eligible to train in expanded function procedures, dental assistants must ~~hold an active registration and~~ comply with one of the following:

a. Be a graduate of an accredited school;

b. Be currently certified by the Dental Assisting National Board (DANB); or

c. Have at least three months of clinical practice as a ~~registered~~ dental assistant ~~or clinical practice as a dental assistant in a state that does not require registration~~.

ITEM 9. Amend paragraph **581.3(1)"d"** as follows:

d. Delegation of any acts to any licensee, ~~or~~ registrant or qualified person that are beyond the training or education of the licensee, ~~or~~ registrant or qualified person, or that are otherwise prohibited by rule;