

**BEFORE THE IOWA DENTAL BOARD**

<b>In the Matter of the Petition for Waiver by:</b>  <b>Dr. Venkata Sruthi Surabathula</b>  <b>Petitioner.</b>	<b>ORDER GRANTING WAIVER</b>
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Pursuant to Iowa Code section 17A.9A and Iowa Administrative Code rule 481—6, the Dental Board (“Board”) makes the following ruling on the Petition for Waiver submitted by Dr. Venkata Sruthi Surabathula (“Petitioner”).

**FACTS AND COURSE OF PROCEEDINGS**

1. Petitioner received her dental degree in 2018 from Rajiv Gandhi University of Health Sciences Karnataka.
2. Her credentials include:
  - a. Foreign-trained dentist with five years of dental school training in India
  - b. Fellowships in Oral Implantology and Lasser Dentistry
  - c. Completed three years of postgraduate training in Prosthodontics at the CODA-accredited – University of Alabama at Birmingham (UAB), while doing three years of active patient treatments.
  - d. Earned a Master’s degree in Clinical Science from UAB
  - e. Successfully cleared TOEFL, ADAT, INBDE, and CRDTS licensure examinations
  - f. Practiced for one year as a general dentist and prosthodontist in Austin, Texas
  - g. Held an active, unrestricted Texas dental license during that period.
3. Petitioner seeks to waive Iowa Administrative Code chapter **481 – 572.7 Licensure or registration by verification**, which states that the application must include the following:
  - a. The applicable application fees, including the background check fee for applicants of a dental or dental hygiene license, as specified in 481—Chapter 571.
  - b. For dental or dental hygiene applicants, a completed packet to facilitate a

criminal history background check.

- c. A verification form, completed by the licensing authority in the jurisdiction that issued the applicant's license or registration, verifying that the applicant's license or registration in that jurisdiction complies with the requirements of Iowa Code section 272C.12. The completed verification form must be sent directly from the licensing authority to the board.
4. Specifically, Petitioner is seeking to waive the requirement that the Texas Dental Board must complete the Iowa Board's official verification form to comply with this Board rule because the Texas Dental Board stated that they do not complete external verification forms and will only send an official license verification certificate directly to the Iowa Dental Board.
  5. The Texas Board has already sent their own official license verification certificate to the Iowa Dental Board.
  6. The Board found that Petitioner was more accurately seeking waiver of 481 IAC 572.3(2) which states: applications for licensure on the basis of examination or credentials must include the following
    - a. satisfactory evidence of graduation from an accredited dental or dental hygiene school.
      - (1) Applicants for dental license must have been issued a doctor of dental surgery (DDS) or doctor of medicine in dentistry (DMD) degree.
      - (2) Graduates of foreign dental schools who have not obtained a DDS or DMD degree from an accredited dental school shall also satisfy the requirements of rule 481—572.4.
  7. Rule 481 IAC 572.4(1) states: Applications for licensure of graduates of foreign dental schools shall include the following: a. Evidence of successful completion of dental education that is substantially equivalent to a DDS or DMD degree issued by an accredited school.
  8. The Board considered the Petition for Waiver at a board meeting on November 7, 2025.

#### **APPLICABLE LAW**

9. Pursuant to Iowa Administrative Code chapter 481—6.1(3), the Board may in its sole discretion issue an order waiving in whole or in part the requirements of a rule if the board finds, based on clear and convincing evidence, all of the following:
  - a. The application of the rule would impose an undue hardship on the person for whom the waiver is requested;
  - b. The waiver from the requirements of the rule in the specific case would not prejudice the substantial legal rights of any person;

- c. The provisions of the rule subject to the petition for waiver are not specifically mandated by statute or another provision of law; and
  - d. Substantially equal protection of public health, safety, and welfare will be afforded by a means other than that prescribed in the particular rule for which the waiver is requested.
10. “The burden of persuasion rests with the petitioner to demonstrate by clear and convincing evidence that the board should exercise its discretion to grant a waiver from a board rule.” 481 IAC 6.1(8)(b).
11. The Board's rules provide “The final decision on whether the circumstances justify the granting of a waiver is at the discretion of the department upon consideration of all relevant factors. Each petition for a waiver will be evaluated by the department based on the unique, individual circumstances set out in the petition.” 481 IAC 6.1(8)(a).
12. “A waiver, if granted, shall provide the narrowest exception possible to the provisions of a rule.” 481 IAC 6.1(8)(f).

#### **ANALYSIS OF WAIVER CRITERIA**

##### **Whether the application of the rule would create an undue hardship on the person for whom the waiver is requested:**

13. Application of the rule (requiring the Texas Board to fill out the Iowa Board’s official verification form and separately, not permitting Petitioner’s degree to meet the substantial equivalency criteria when the information provided indicates it is substantially equivalent) would cause undue hardship as this would be untenable in the circumstances.

##### **Whether the waiver from the requirements of the rule in the specific case would prejudice the substantial legal rights of any person:**

14. Waiving the requirements of the rule would not prejudice the substantial legal rights of any other person.

##### **Whether the provision of the rule subject to the petition for waiver is not specifically mandated by another provision of law:**

15. The requirement found in the Board’s administrative rule is not specifically mandated by statute.

##### **Whether substantially equal protection of the public health, safety, and welfare will be afforded by a means other than that prescribed in the particular rule for which the waiver is requested:**

16. The public health, safety, and welfare will be afforded by other means if this waiver is granted. The Board has received the Texas Board's license verification certificate which is substantially the same as the form generally used by the Iowa Board to affirm the applicant's credentials and other state licensure. Additionally, Petitioner has demonstrated that her degree is substantially equivalent to a DDS or DMD degree issued by an accredited school.

**PETITIONER HAS MET THE CRITERIA TO WAIVE RULE 481 IAC 572.7(1)(c) and 481 IAC 572.3(2).**

Upon review of the Petition, the Board finds that Petitioner has satisfied the four criteria for waiver of the requirements in 481 IAC 572.7(1)(c) and 481 IAC 572.3(2).

**ORDER**

**IT IS THEREFORE ORDERED** the Petition for Waiver of 481 IAC 572.7(1)(c) and 481 IAC 572.3(2) is GRANTED.

Issued January 5, 2026.



Dr. James Nemmers, D.D.S.  
Chairperson  
Iowa Dental Board

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