

BEFORE THE IOWA DENTAL BOARD

<p>In the Matter of the Petition for Waiver by:</p> <p>Nikita Puri, D.D.S.</p> <p>Petitioner.</p>	<p>ORDER DENYING WAIVER</p>
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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 Nikita Puri, D.D.S. (“Petitioner”).

FACTS AND COURSE OF PROCEEDINGS

1. Petitioner completed her dental education at the Universidad Europea de Madrid in 2023.
2. Petitioner completed two years full-time in a clinical fellowship at a CODA accredited school, but not in a CODA-accredited program.
3. Petitioner seeks to waive Iowa Administrative Code chapter **481 – 572.4(1)(a)(3)** which 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.
 - (3) Results of a formal evaluation of the applicant’s foreign dental education by a board-approved professional credentialing organization. The results of the evaluation must indicate that the nonaccredited dental education completed was substantially equivalent to that of an accredited dental school.”
4. Petitioner obtained an equivalency evaluation that indicates her dental education is equivalent to five years of CODA equivalent education in the United States, but the administrative rules require education to be equivalent to a DDS or DMD degree. Petitioner completed two years of a residency program, but it was not in general dentistry and the program was not accredited.
5. The Board considered the Petition for Waiver at a board meeting on April 3, 2026.

APPLICABLE LAW

6. 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.
7. “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).
 8. 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).
 9. “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:

10. Application of the rule (requiring full CODA educational equivalency required by rule) would not cause undue hardship as this is what is required by rule of all graduates of foreign dental schools when applying based on credentials.

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

11. 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:

12. 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:

13. The public health, safety, and welfare will not be afforded by other means if this waiver is granted. The rule requiring proof of full CODA equivalency of a foreign dental school is necessary to ensure the public health, safety, and welfare is maintained.

**PETITIONER HAS NOT MET THE CRITERIA TO
WAIVE RULE 481 IAC 572.4(1)(a)(3).**

Upon review of the Petition, the Board finds that Petitioner has not satisfied the four criteria for waiver of the requirements in 481 IAC 572.4(1)(a)(3) due to the lack of equivalency to a DDS or DMD degree.

ORDER

IT IS THEREFORE ORDERED the Petition for Waiver of 481 IAC 572.4(1)(a)(3) is DENIED.

Issued April 9, 2026.



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

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