



October 19, 2011

2908

Ms. Cynthia Montgomery, Esquire, Regulatory Counsel
State Board of Dentistry
P.O. Box 2649
Harrisburg, PA 17105

Re: Regulation 16A-4624

Dear Ms. Montgomery:

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I/M/C
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On behalf of the more than 5,500 members of the Pennsylvania Dental Association (PDA), I thank you for the opportunity to comment on proposed rulemaking requiring expanded function dental assistants (EFDAs) to obtain three hours of continuing education (CE) in coronal polishing.

PDA believes that it is unnecessary to require any EFDA to obtain three hours of continuing education in this subject matter due to the skill set they acquire to become certified in Pennsylvania. However, should the SBOD move forward promulgating these regulations, PDA believes there are three separate groups of EFDAs that need to be considered:

1. We believe the three hour CE would be a reasonable requirement for EFDAs who never had formal schooling and were "grandfathered" into an EFDA certification.
2. EFDAs certified by the SBOD prior to March 31, 2011, who have received formal training to polish restorations that often involve large portions of the clinical crown, should not be subject to the three hour CE requirement. Their skill to do a coronal polishing is utilized on a daily basis.
3. We believe it is not necessary for EFDAs who are certified after this date to obtain the three CE hours. Those who are now graduating from accredited programs are sure to learn the skills necessary to perform coronal polishing on patients while they are enrolled in school.

Should you feel it necessary to pass an additional CE requirement for EFDAs, we hope you consider removing Section 33.402(2) from the draft rulemaking. At the very least, this provision should be amended so that the requirement only applies to those EFDAs who will graduate

during this current biennial renewal period and not those EFDA's who graduate in subsequent biennial renewal periods.

Thank you for your attention to this important issue. Please contact me directly at (724) 376-7161 or djcdmd@windstream.net with any questions or concerns. Or you may contact Marisa Swarney, PDA's director of government relations, at (717) 234-59431 or mss@padental.org.

Sincerely,

A handwritten signature in cursive script that reads "Dennis J. Charlton". The signature is written in black ink and is positioned above the typed name.

Dennis J. Charlton, DMD
President