

EMBARGOED MATERIAL

Original: 1960

RECEIVED

2000 APR 12 AM 8:49

April 13, 2000

INDEPENDENT REGULATORY
REVIEW COMMISSION



Mr. Robert E. Nice
Executive Director
Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

Dear Mr. Nice:

The members of the Pennsylvania Dental Association (PDA) have been following, with great interest, the progression of the regulations for Expanded Function Dental Assistants (EFDAs) and we appreciate the opportunity to comment on the regulations now before you for consideration.

The PDA is pleased that recommendations made to the State Board of Dentistry to regulate the practice of EFDAs were taken into consideration before IRRC votes to finalize the proposed regulations. We agree with the Independent Regulatory Review Commission's (IRRC) educational assessment that EFDA programs may be accredited by an agency approved by the United States Department of Education Council on Post-Secondary Accreditation whose expanded function educational standards are approved by the Board, in addition to allowing accreditation by the Commission of the American Dental Association (CODA).

Furthermore, in section 33.102(c), PDA supports the proposed regulation as stated that EFDAs must:

3. Complete a certification program in expanded function dental assisting of at least 200 hours of clinical and didactic instruction from an accredited dental assisting program.

The PDA believes that this regulation would facilitate those dental assistants who have on-the-job training and wish to advance their careers by allowing them the opportunity to have a reasonable number of hours of EFDA training.

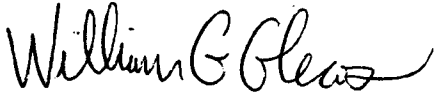
Overall, the PDA is pleased that the educational standards proposed in the EFDA regulations increases access to education, ultimately allowing more students to be educated in caring for the oral health needs of Pennsylvanians. We recognize the necessity for an increase of expanded function auxiliary personnel within our profession and believe that these regulations will improve access to dental services in the Commonwealth.

3501 N. Front Street • P.O. Box 3341 • Harrisburg, PA 17105
(717) 234-5941 • (717) 232-7169 Fax • www.padental.org

See your PDA member dentist regularly.

Thank you for your consideration of this letter. Please do not hesitate to call me at (814) 459-1608, or Marisa Fenice in the PDA central office at (717) 234-5941, extension 116, with any questions or concerns regarding PDA's position on EFDAs, or oral health in general.

Sincerely,

A handwritten signature in cursive script that reads "William G. Glecos". The signature is written in black ink and is positioned above the typed name.

William G. Glecos, D.D.S.
President

cc: Dr. Philip T. Siegel, Chair, Council on Government Relations
Camille Kostelac-Cherry, Esq., CEO
Dr. Norbert Gannon, Chair, State Board of Dentistry