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 REVIEW COMMISSION

August 7, 1998

Judith Pachter Schulder
 Counsel, State Board of Dentistry
 116 Pine Street
 Harrisburg, Pa. 17105-2649

Re:#16A-465

Ms. Schulder,

I would first like to apologize for sending this letter to you at such late notice. I however, only received a copy of the proposed rulemaking today through the kindness of Mr. Chuck Tyrrell of I.R.R.C.

The concerns I would like to address pertain to Annex A, Title 49, 33.102 (Professional education, Expanded function dental assistants).

I am concerned with the simplicity of the statement of students having the ability to complete a certificate program of 200 hours without any prerequisite requirements to enter this pathway.

The State Board of Dentistry has worked very hard and very diligently to bring about the recognition of and strict guidelines to becoming a Certified EFDA. I want to sincerely thank you for your accomplishments. It is because of your sincere concerns that I would like to see you consider the following recommendation.

By simply stating, "Completion of a certification program in expanded function dental assisting of at least 200 hours of clinical and didactic instruction", does not require any previous basic training as a dental assistant. A 200 hour course in expanded functions is not able to, nor is the course intended to instruct a student in basic knowledge of dental assisting. The basic knowledge to which I refer would include, knowledge of dental materials and their properties and mainly current infection-control standards set by the Federal Center for Disease Control (set forth requirement under Unprofessional conduct, 33.211).



What I would like to see you consider is the prerequisite requirements that both Manor and Harcum Jr. Colleges have put into place before accepting a student into our programs.

It is required that a student be a Certified Dental Assistant, have a minimum of two years working experience and have completed and passed an accredited dental anatomy course. The student is also offered the opportunity to challenge their knowledge of dental anatomy by taking and passing a dental anatomy final examination. In setting, a prerequisite we know we have a knowledgeable student that will be able to perform expanded functions with better proficiency. I would also like to emphasize that most dental assisting schools teach only basic dental anatomy, not detailing dental morphology which is so important when performing expanded functions. Our reason for requiring that students be a Certified Dental Assistant ensures us of their knowledge in dental materials and infection control.

I have tried to keep my letter short and directly to the point of the issue I wished to address. In reviewing the remaining issues addressed in the proposed rulemaking, they seem to be very fair and well thought out. I would like to thank you for your time and hopefully your consideration of this issue.

Respectfully,



Diane Mahan CDA, EFDA
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