

ORIGINAL: 2308



November 21, 2002

Ms. Deborah Eskin, Counsel
State Board of Dentistry
P.O. Box 2649
Harrisburg, PA 17105-2649

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STATE BOARD OF DENTISTRY
HARRISBURG, PA
COPY

Re: Proposed Rulemaking, Reference Number 16A-4612

Dear Ms. Eskin:

On behalf of the more than 5,700 members of the Pennsylvania Dental Association (PDA), I would like to thank you for the opportunity to comment on the State Board of Dentistry's (SBOD) proposed regulatory change, Reference Number 16A-4612. The PDA supports the SBOD's efforts to implement a fair and reasonable examination process for Expanded Function Dental Assistants (EFDAs) practicing in Pennsylvania.

Current PDA policy maintains that a written certifying examination is sufficient in testing the more than 1,800 EFDAs who hold temporary permits to practice in Pennsylvania. The PDA also maintains that a written examination will adequately assess the competency of EFDAs not grandfathered in Act 160. Therefore, the PDA supports the proposed regulatory change that would allow EFDAs to practice after passing a written examination.

As the PDA understands it, the Department of State will reissue its Request-for-Proposal to contract with an agency that will administer an examination to temporarily certified EFDAs, as well as to those EFDAs now graduating from accredited programs in Pennsylvania. The PDA recommends that the State Board consider the following four points, as it commences a contractual agreement with a testing entity:

- the testing agency creates a written examination, similar to the radiology examination, for all EFDAs temporarily certified by the state. The PDA also recommends that EFDAs graduating from accredited programs take the same written examination
- the testing agency charge EFDAs an examination fee that is comparable to the fees charged to other health care auxiliary personnel
- EFDAs have the option of receiving study material prior to taking the examination
- EFDAs who may fail the initial examination have the ability to retake the examination in a timely manner, so as not to eliminate these vital auxiliary personnel from the dental office for an extended period of time

Additionally, the PDA had the opportunity to submit recommendations to the SBOD for standardizing the curriculum of EFDA programs in Pennsylvania. The 2002 PDA House of Delegates approved the following policy regarding EFDA curriculum:

**RESOLVED THAT THE PENNSYLVANIA DENTAL ASSOCIATION PROPOSES
4/02BT58: THE FOLLOWING TO THE STATE BOARD OF DENTISTRY: That
all accredited EFDA programs administered in Pennsylvania model their
curriculum on the Didactic Curriculum Topic Areas listed in the PDA Policy
Statement Curriculum Guidelines for EFDA Educational Programs. And be**

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it further resolved that the Middle States Commission on Higher Education be listed as an option for accreditation of EFDA programs in Pennsylvania in the State Board of Dentistry guidelines.

The PDA believes it is appropriate for every EFDA program curriculum in Pennsylvania to be equivalent in its major curriculum and format to the PDA Policy Statement Curriculum Guidelines for EFDA Educational Programs (see enclosure). This model curriculum, based on the programs currently instituted at both Harcum and Manor Colleges, has withstood the test of time as an effective model on which to base EFDA practice in Pennsylvania.

The PDA appreciates the attention the SBOD has devoted to the issue of EFDA education and certification in Pennsylvania. If there is anything the PDA can do to assist with efforts to standardize EFDA curriculum and implement an examination, please do not hesitate to contact the PDA Government Relations Department at (717) 234-5941.

Sincerely,



ANDREW J KWASNY, DMD, MSD
Chair, PDA Council on Government Relations

enclosure

cc: Representative Mario Civera, Chair, House Professional Licensure Committee
Senator Charles Dent, Chair, Senate Consumer Protection & Licensure Committee
Senator Stewart Greenleaf
John R. McGinley, Chair, Independent Regulatory Review Commission
David Williams, Commissioner, Bureau of Professional and Occupational Affairs
Members of the State Board of Dentistry
Dr. Michael Cerveris, President
Dr. Stephen Jaworski, President Elect
Ms. Camille Kostelac-Cherry, Esquire, Chief Executive Officer

PDA Policy Statement

Curriculum Guidelines for EFDA Educational Programs

The following recommendation applies to those candidates for the proposed EFDA certification examination who must successfully complete an educational requirement as specified by the Rules and Regulations of the State Board of Dentistry.

Regardless of whether the course is a two hundred hour educational program, or an Associates Degree Program, or a Vocational Technical Program, the didactic curriculum should include, as a minimum, those topic areas specified below. Instruction may include lecture, self-study, laboratory and patient care experiences through clinical externships.

Didactic Curriculum Topic Areas

- **Terminology and Tooth Morphology***
 Including dental anatomy, caries, cavity classification and occlusion
- **Armamentarium and Instrumentation***
- **Isolation***
 Rubber Dam
- **Bases and Liners**
- **Matrix Systems and Wedges***
- **Amalgam***
 Including properties and characteristics, armamentarium, placement, contouring, finishing and polishing
- **Composite Resins***
 Including properties and characteristics, armamentarium, anterior and posterior restorations, placement, contouring, finishing and polishing
- **Jurisprudence**
 Including Pennsylvania Dental Law, State Board of Dentistry Rules and Regulations especially pertaining to dental assistants and EDFA's

* = *"Dentistry for The Restorative Expanded Function Dental Auxiliary"* Textbook – Hottel and Ruggiero, 1996 as a study guide