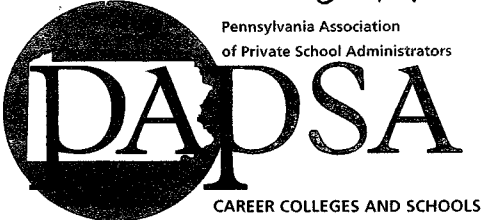


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November 3, 2009

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Cynthia Montgomery, Regulatory Counsel  
 State Board of Dentistry  
 PO Box 2649  
 Harrisburg, PA 17105-1649

Dear Ms. Montgomery:

The Pennsylvania Association of Private School Administrators, which represents nine schools with EFDA approved programs, appreciates the opportunity to comment on the proposed EFDA program approval regulations.

A general question school administrators asked was will previously Board approved EFDA programs be required to go through another program approval based on these regulations or will previously approved programs be "grandfathered"?

33.102(c)(1)(i) For clarification, must the EFDA program be an associates degree program or must the school offer an associates degree for some of their programs? We assume from the language that the school, in general, must have the authority to offer an associate degree but the EFDA program does not need to be an associate degree. An associate degree raises the tuition cost and extends the time for students because of 300 to 400 hours of extra general education courses.

Some of our schools offer the associates degree in EFDA, others feel that students should not bear the additional time and cost of the degree.

33.102(iii) Some of our schools, which are all institutionally accredited, question the requirement for additional programmatic accreditation. It is a cost burden for students and school accreditation should suffice.

Other schools request that other allied medical program accreditors such as the Accrediting Bureau of Health Education Schools (ABHES) be included as an accrediting option to CODA.

33.117(ii) Clinical instruction – 1) It was unclear as to whether clinical instruction can be done on the school premises, including laboratory or preclinical instruction? 2) If the student is doing an intern or externship at a separate, outside dental facility, it was unclear if the school instructor must be present at all times?

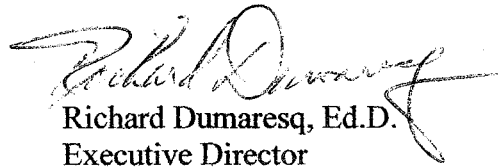
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33.117(4)(iii) While our schools agree that faculty should have EFDA certification, as well as two years of clinical experience and educational methodology course(s), we question the need for CDA certification only from DANB. Good teachers are difficult to find and many prospective teachers may have chosen national certification as a Registered Dental Assistant (RDA) certified by American Medical Technologists (AMT). Both DANB and AMT are accredited by the National Commission for Certifying Agencies and are members of the National Organization of Competency Assurance.

Thank you for considering our comments.

Sincerely,



Richard Dumaesq, Ed.D.  
Executive Director

RD:ld