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Dr. John V. Reitz, D.D.S.  
Chairman, Pennsylvania State Board of Dentistry  
Department of State  
Bureau of Professional and Occupational Affairs  
P. O. Box 2649  
Harrisburg, Pennsylvania 17105-2649

INDEPENDENT REGULATORY  
DENTAL COMMISSION

Dear Dr. Reitz and members of the Pennsylvania State Dental Board,

Please accept this as the Pennsylvania Academy of General Dentistry's (PAGD) public comment on the proposed changes to Pennsylvania Administrative Code § 33.102 (c)(1) regarding Professional Education for Expanded Function Dental Assistants (EFDA).

PAGD feels strongly that as part of verification for certification as an EFDA, that the candidate must also have a minimum of 2 years experience as a dental assistant or one year experience as a Certified Dental Assistant prior to entering an EFDA training program.

Our reasoning is that since an EFDA provides a higher level of skill sets, and their job duties require a greater sense of professional understanding, there should be a basic requirement of clinical dental experience.

The way the EFDA program is currently structured it is possible for a candidate to go from receiving certification or training as a dental assistant without ever gaining real-life experience before entering an EFDA program. This creates a scenario for someone to be trained as an EFDA with only clinical experience in an educational setting. When these candidates enter the dental office setting, it can be for the first time. They are expected to perform at a higher level within the dental team with no experience as to how the dental team functions.

PAGD members who have hired EFDAs who received back-to-back training as an assistant and then an EFDA without dental office experience have found that these professionals are not prepared to fully function within the dental office. In fact, some EFDAs who have gone for back-to-back training cannot even properly suction let alone place complex restorations.

PAGD is concerned that in the wrong setting an EFDA could injure someone due to a lack of basic understanding of how the dental team interacts and proper knowledge of procedures and materials. We strongly feel that there needs to be a minimum experience level in the dental office setting before someone could be a candidate in an EFDA program. We feel that it is important to the success of the EFDA program and to patient safety.

Thank you for your time and consideration.

Sincerely,

Daniel Martel, DDS, MAGD  
President, Pennsylvania Academy of General Dentistry