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Cynthia Montgomery, Regulatory Council
State Board of Dentistry
P. O. Box 2649
Harrisburg, PA 17105-2649

Dear Cynthia Montgomery,

I am writing to express my concern over the proposed amendment to the Dental Law regarding the additional requirement of EFDA's to take 3 hours of course work to then be able to perform coronal polishing. I am not opposed to the need for proper training to perform any task, but feel that the proposed regulations are excessive.

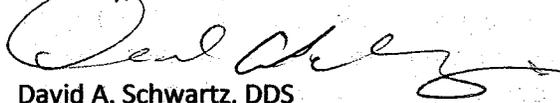
My recollection of how I was trained as a freshman at New York University School of Dentistry, in 1986, was a brief 20minute lecture, then trying it on a classmate while an instructor looked over my shoulder. In most cases, the student passed the first time without any additional guidance. More time was spent waiting for you turn to show the skill than it took to learn and demonstrate it.

I believe that this type of training could be handled in office in about a half hour by any licensed dentist or hygienist for any current EFDA's. For an EFDA to perform any duties, they must have the attending dentist's permission and supervision. This means that in the doctor's judgment, the EFDA not only has the credentials, but the skills required to perform the tasks. The task of coronal polishing is already similar to the task of finishing and polishing restorations. Unlike in dental hygiene school, where the use of a handpiece would be a new skill and may require 3 hours of training, handpiece control would already have been demonstrated for an EFDA to pass the courses for their existing list of allowed procedures.

An additional concern, if this passes, as written in the PA Bulletin, are there enough facilities in place now to conveniently give courses for all the EFDA's and still meet the deadline of March 31, 2013?

Let's not turn this into a fiasco like was to get the current EFDA testing together!

Sincerely,


David A. Schwartz, DDS

