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October 14, 2011

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

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RE: EFDA Proposed Rule Making

Dear Ms. Montgomery,

I am writing in regards to the EFDA scope of practice and continuing education proposed rulemaking. As an EFDA and director of the EFDA program at Harcum College, I would like to comment on the proposed regulations. First, under scope of practice, would you clarify if under section **§33.205a (1)(viii) Performing coronal polishing** would include air polishing? EFDA educational programs would need to include training specific to air polishing.

Under **§33.205a (b) Prohibition**, I would suggest adding that EFDA's may not perform periodontal instrumentation. The additional wording would reinforce that EFDA's should not be going subgingival and performing procedures that they have not been train to do.

I recommend that the wording under **§33.402 Continuing education subject areas (g)(1)** be change to: An expanded function dental assistant certified by the Board by March 31, 2011, shall complete 3 of the 10 required hours of continuing education *prior to March 31, 2013*, in the area of coronal polishing. The way the wording currently reads is that EFDA's would have to take 3 CEU's in coronal polishing between April 1, 2011 and March 31, 2013. Many EFDA's took a coronal polishing course as soon as the law was passed allowing them to perform coronal polishing and fluoride treatments.

The EFDA's that were proactive and took a three credit continuing educational course to learn an additional skill prior to April 1, 2011 would then have to take an additional course on coronal polishing. Changing the wording to *prior to March 31, 2013* would allow those EFDA's to meet the State regulation.

EFDA programs should now be teaching students in their programs coronal polishing, application of fluoride and taking impressions for study models, diagnostic casts or athletic appliances. The additions to the EFDA scope of practice should be reflected in the proposed EFDA program guidelines.

Thank you for considering my suggestions and listening to my comments.

Sincerely,

*Dorothea M. Cavallucci*

Dorothea M. Cavallucci, CDA, EFDA, RDH