



Lauren Studdard &lt;lstuddard@tsbde.texas.gov&gt;

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**Fwd: Comment regarding proposed rule RULE §114.5 Coronal Polishing**

1 message

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**Christine Mendez** <cmendez@tsbde.texas.gov>  
To: Lauren Studdard <lstuddard@tsbde.texas.gov>

Fri, Mar 22, 2024 at 4:53 PM

Hi Lauren,

Here a comment received regarding the proposed rule.

Begin forwarded message:

**From:** "prashant.harjai" <prashant.harjai@hccs.edu>  
**Date:** March 22, 2024 at 12:50:52 PM CDT  
**To:** Christine Mendez <cmendez@tsbde.texas.gov>  
**Cc:** "rosalinda.garza" <rosalinda.garza@hccs.edu>  
**Subject:** Comment regarding proposed rule RULE §114.5 Coronal Polishing

Dear Ms. Mendez

I am reaching out to you to comment on proposed rule RULE §114.5 Coronal Polishing on <https://tsbde.texas.gov/laws-rules/proposed-rules/> at the Feb 16 2024 board meeting.

One of the change proposed for Coronal polishing in this proposal is reduction of number of years required to be a Dental Assistant from 2 years to 1 year.

Is there a rationale for this change not being extended to pits and fissure sealants requirements listed on [https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p\\_dir=&p\\_rloc=&p\\_tloc=&p\\_ploc=&pg=1&p\\_tac=&ti=22&pt=5&ch=114&rl=3](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=22&pt=5&ch=114&rl=3) ?

If current proposal is implemented to coronal polishing only, this will create 3 sets of dental assistants:

1. DAs that cannot do both skills (less than 1 year on year experience) : do not meet criteria for registering into both courses
2. DAs that can do only polishing and not pits and fissure sealants (1-2 years experience as DA): meet criteria for registering into polishing course only
3. DAs that can do both skills (2 or more years experience as a DA) : meet criteria for registering into polishing and sealants course

A proposal extending the reduction of number of years required to be a Dental Assistant from 2 years to 1 year to pits and fissure sealants will reduce this to 2 sets of Dental Assistants

1. DAs that cannot do both skills (less than 1 year on year experience) : do not meet criteria for registering into both courses
2. DAs that can do both skills (2 or more years experience as a DA) : meet criteria for registering into polishing and sealants course

The extension might make is easier to track eligibility and scope of practice for Texas unless the TSBDE anticipates that it might negatively impact health and safety of Texans.

Sincerely

**Prashant Harjai** | Program Manager, Center for Healthcare Professionals

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