



September 27, 2024

Dr. Linda Burke
Chair, Dental Practice Committee
Texas State Board of Dental Examiners
1801 Congress Avenue, Suite 8.600
Austin, Texas 78701

Via Email to: stakeholders@tsbde.texas.gov

Dear Dr. Burke,

Thank you for the opportunity to provide the Texas Academy of Pediatric Dentistry's (TAPD) input on potentially changing rules requiring the use of lead aprons for dental x-rays.

Patient safety is an essential component of quality oral health care for infants, children, and adolescents. For over 40 years, pediatric dentists have been urged to keep radiation doses to a minimum and avoid all unnecessary exposure.¹² This has been achieved, in part, by using patient protection devices such as aprons, collars and shields.³

Because medical and dental guidelines now recommend discontinuing the use of patient thyroid, gonadal and fetal shielding during x-rays, TAPD supports removing 22 TAC 113.2(c). We believe that each dentist, in consultation with current guidelines, and with the patient and/or a parent/guardian, should determine if the use of a lead apron is in the best interest of the patient.

Pediatric dentists should continue to use the "as low as reasonably achievable" principal when deciding if shielding is necessary for a patient. We urge pediatric dentists to consult and educate patients and parents about these new guidelines and ultimately use their professional judgment in deciding whether the use of lead aprons is needed. We do not, however, believe the mandate of use is necessary.

We again thank you for opportunity to provide our feedback on this important topic.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Coppola".

Kevin Coppola, DDS
President, Texas Academy of Pediatric Dentistry

¹ American Academy of Pedodontics. Dental Radiographs in Children. American Academy of Pediatric Dentistry Reference Manual 1991. Available at www.aapd.org/assets/1/7/E_Radiographs1.PDF

² Arthur J. Nowak. Radiation Exposure in Pediatric Dentistry: An Introduction. 1982. Available at www.aapd.org/globalassets/media/publications/archives/nowak-03-s2.pdf

³ American Academy of Pediatric Dentistry. Prescribing Dental Radiographs for Infants, Children, Adolescents, and Individuals with Special Health Care Needs, Revised 2024. Available at www.aapd.org/globalassets/media/policies_guidelines/bp_prescribingradiographs.pdf