



April 15, 2024

Ms. Casey Nichols  
Executive Director  
Texas State Board of Dental Examiners  
1801 Congress Avenue, Suite 8.600  
Austin, Texas 78701

Dear Ms. Nichols,

Thank you for the opportunity to share our support of 22 TAC §114.5, concerning coronal polishing requirements for dental assistants. As you know, retaining dental assistants has been a struggle for pediatric dental practices since the beginning of the COVID-19 pandemic. While we know that this rule will not completely solve our workforce needs, TAPD does believe removing the work experience requirement for a dental assistant who graduated from a CODA-accredited program and reducing the work experience requirement from two years to one year for dental assistants who did not graduate from a CODA-accredited program is a step in the right direction.

TAPD's number one goal is the safety of our pediatric patients. We fully support the board's recommendation to continue the eight-hour clinical and didactic education requirements in coronal polishing for dental assistants who obtain one year of experience. We do not believe that reducing the work experience requirement of a dental assistant performing coronal polishing will harm our patients. In fact, 82% of our members agree the experience requirement for a dental assistant to perform coronal polishing should be reduced from the current two-year requirement.

TAPD would like to continue working with the Texas State Board of Dental Examiners (TSBDE) to revise 22 TAC §114.5, including expanding the ways dental assistants can obtain coronal polishing education. Finding courses that provide coronal polishing education is difficult for Texans who do not live in areas where there is a dental school, dental hygiene school or dental assisting program. Expanding who can teach a coronal polishing education course to include dentists who have completed teaching training modules approved by the TSBDE will allow greater access to coronal polishing education.

We thank you for working to lessen the coronal polishing experience requirements for dental assistants and we appreciate the opportunity to continue working together in discussions regarding coronal polishing. If you have any questions, please do not hesitate to reach out.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Coppola", is written over a light blue horizontal line.

Kevin Coppola, DDS  
President, Texas Academy of Pediatric Dentistry