

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

April 21, 2024

Dear Ms. Nichols and Texas State Board of Dental Examiners Members:

As the current President of the Texas Dental Hygienists' Association (TDHA), representing myself and all Texas licensed dental hygienists, I want to express our opposition for proposed Rule 22 TAC §114.5 regarding extension of duties of dental assistants to perform coronal polishing.

TDHA supports continuing high standards of care for our patients with public safety being the number one priority. We feel that all dental providers should obtain formal education and experience through an accredited program by the Commission on Dental Accreditation (CODA) of the American Dental Association prior to performing dental services.

The proposed change to Rule 114.5 will allow a non-CODA dental assistant with at least one-year experience to perform coronal polishing on a live patient. This length of time is less than that of a dental hygiene student enrolled in an accredited dental hygiene program, who must obtain 2+ years of education prior to being able to perform coronal polishing. Additionally, one-year experience does not allow a dental assistant to acquire knowledge on such things as the principles of coronal polishing, intraoral anatomy, indications, contraindications, and complications associated with improper coronal polishing, infection control procedures, and jurisprudence related to coronal polishing.

TDHA supports Rule 114.5 as it is currently written in statute. Although workforce issues continue to be present in Texas, TDHA commends the Board for its continuing efforts to protect the public and maintain the highest standards of dental care in our state.

If you have questions, please reach out to me at the email listed below.

Sincerely,



Shawna Greer, RDH, BSDH, MAADH, FADHA
President, Texas Dental Hygienists' Association

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