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**To:** [DSPS Admin Rules](#)  
**Cc:**  
**Subject:** Public comment on EmR2304  
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Organization: Gateway Technical College

Comments: I have several questions/comments regarding the EFDA implementation:

1. 'Accredited' college. Is this program specific through The Commission on Dental Accreditation (CODA) or is this the overall college accreditation? It is not identified.
2. Why are graduates of an accredited Dental Assistant program required to have the Certified Dental Assistant (CDA) certification through the Dental Assistant National Board (DANB) and those that have 2 years of dental assisting experience NOT required to have the CDA certification through DANB? How did this even pass? I would think that a dentist would like to employ a dental assistant who has been formally educated AND certified for the EFDA. The bill is currently written as though to placate those dentists whose dental assistants have been employed for many years without formal education, which is possible with the zero education requirements in the state for dental assistants, but to have it written as though you are expecting a lot more of those who are formally educated vs. those who just have a couple years of on-the-job training. Why aren't ALL potential EFDA's required to have the CDA? How is this even equitable? This will absolutely impact all dental assisting programs in the state as there is no incentive for formal education as a dental assistant when they can be trained for 2 years then complete the EFDA program. The bill references surrounding states; perhaps an investigation on how their successful EFDA programs were implemented and the educational requirements need to be reviewed for success in Wisconsin.
3. All EFDA's should be required to have continuing education, much like dentists and dental hygienists. Afterall, EFDA's are restoring teeth back to their natural function. Currently, all CDA's must have 12 hours of continuing education; EFDA's should follow suit.
4. Functions of EFDA: they are very vaguely written. For instance: C.) impressions', the question is, which type? Preliminary? Final?

I am the Program Director for the CODA accredited Dental Assistant instructor at Gateway Technical College for the last 20 years and I'm surprised that myself and other Dental Assistant Program Director's in the state were not included in the creation of this bill. It seems the DEB is only interested in what dental hygienists have to say about this and what they feel is important to their job security. As experts in the field, I feel we should have been consulted. I'd be happy to discuss this further to provide insight and clarity to this very important bill. Please feel free to contact me.