

UAO and UDA Proposed Language Summary

The UAO and the UDA have worked extensively since the December Dentist and Dental Hygienist Board meeting to resolve the concerns that the UAO had with the coronal adhesive removal section of the rule that the Utah Dentist and Dental Hygienist Board approved in the December meeting. This work has led to a proposal that the UAO and UDA believe will generate consensus agreement.

Summary of Proposed Changes:

The UAO and UDA's proposed language includes the requirement that expanded function dental auxiliaries can only use a low-speed handpiece for coronal adhesive removal. The UAO and UDA's proposal does make a number of changes, which are summarized in the final page of this document.

DOPL prepared a draft of the rule that integrates all of the proposed changes from the UAO and UDA's joint proposal. This includes language in the proposal that was directly acknowledged as changes and language in the proposal that differed from the language in the Board-approved draft of the rule from December without being addressed as a change.

DOPL's Perspective:

DOPL is comfortable with most of the UAO and UDA's proposed language, but wants the Dentist and Dental Hygienist Board's input on their proposed changes. However, there are a few proposed changes by the UAO and UDA that DOPL wanted to highlight to the Dentist and Dental Hygienist Board that DOPL has concerns with.

Requiring All Education Programs to Undergo a DOPL Review:

The primary UAO and UDA proposed change that DOPL wants to highlight is the proposed language that would require all education programs receive approval from DOPL and the Dentist and Dental Hygienist Board in Subsection R156-69-808c(2)(b)(i)(B), regardless of whether they are accredited by CODA or recognized by DANB or the UAO. Under the Board-approved draft of the rule from December, all programs would be required to include all of the topics and hours, with DOPL and the Dentist and Dental Hygienist only directly reviewing programs that are not accredited or recognized by CODA, DANB, or the UAO. The UAO and UDA's proposed language requires all training programs to be accredited or recognized by one of CODA, DANB, or the UAO, then undergo a second review by DOPL. DOPL is concerned with the substantial increase in administrative burden for DOPL, the Dentist and Dental Hygienist Board, and the education providers created by this proposed change.

Removing Requirement on the Timing of the Final Evaluation by Supervising Dentist:

The second key change DOPL wants to highlight is the removal of the requirement for the final evaluation of the coronal adhesive removal to be performed prior to the patient leaving in Subsection R156-69-808c(4)(d). It is DOPL's understanding that performing the final evaluation prior to the patient leaving is in-line with the best practices of dentistry, which is why this is required for the other expanded functions as well.

Absence of Live Patient Experience in Education and Examinations:

Another key change DOPL wants to highlight is that all 3 requirements that practice or evaluation be performed on a live patient are absent from the UAO and UDA's proposal. The UAO and UDA's proposal is missing the 2 clinical hours in Table 2 for clinical integration and simulated patient care, the requirement for the competency examination to be on a live patient in Table 2 for competency examinations, and the requirement for an independent examination, along with the clinical component of the exam, in Subsection R156-69-808c(2)(c).

Adding Placeholder Text to Training Requirements:

In addition to the previous changes, the UAO and UDA's proposal included a line from the DOPL draft of the rule presented to the Dentist and Dental Hygienist Board in the December meeting that was intended as a placeholder for the December meeting to discuss whether any other training was required. This is the line "other requirements specific to the removal of coronal dental adhesive" in Table 2 for clinical integration and simulated patient care. This line should be removed from the final draft.

Summary of Proposed Changes:

Any changes that are underlined were changes specifically mentioned or noted, while all other changes were discrepancies between the proposed rule language and the draft language that the Dentist and Dental Hygienist Board approved in December.

1. Lowering the hours that dental assistants need to have worked to be eligible for the coronal adhesive removal certification from 3,500 hours to 2,000 hours - Subsection R156-69-808c(2)(a)(ii)(A)
2. Changing the American Association of Orthodontics (AAO) to the Utah Association of Orthodontics (UAO) - Subsection R156-69-808c(2)(b)(i)(A)(III)
3. Requiring all education programs be reviewed and approved by DOPL and the Dental and Dental Hygienist Board, regardless of their accreditation or recognition status - Subsection R156-69-808c(2)(b)(ii)
4. Requiring the instructor of the training program is licensed as a dentist - Subsection R156-69-808c(2)(a)(iii)(A)
5. Removing the 4,000 hours of minimum experience for an instructor - Subsection R156-69-808c(2)(b)(iii)(C)
6. Removing the requirement for an independent examination - Subsection R156-69-808c(2)(c)
7. Modifying the training requirements - Subsection R156-69-808c(3)
 - a. Removing the "use of dental radiographs in identification of dental restorations" in the appliances, restorations, and materials training requirements
 - b. Reducing the hours of instruction on dental instruments from 4 to 3
 - c. Increasing the hours of instruction on techniques for polishing from 2 to 3
 - d. Removing professional ethics from the law and rule training and adding specific topics that must be covered
 - e. Modifying the clinical integration and simulated patient care training requirements
 - i. Removing patient and provider ergonomics
 - ii. Removing the "under direct supervision" requirement for the removal and enamel polishing of 55 tooth surfaces
 - iii. Adding "other requirements specific to the removal of coronal dental adhesive"
 - iv. Removing the 2 clinical hours
 - f. Removing "Comprehensive" from the title of the knowledge-based written exam and adding specific topics the exam must include
 - g. Removing the number of teeth and the requirement that the removal be performed on a live patient during the competency examinations
 - h. Other changes to the wording of requirements
8. Removing the requirement that magnification must be used during the removal of coronal adhesive - Subsection R156-69-808c(4)(d)
9. Removing the requirement of the supervising dentist to review the patient's teeth before the patient leaves - Subsection R156-69-808c(4)(e)