



The Honorable Marc Berman
Chairman, Assembly Business and Professions Committee
1020 N Street, Suite 379
Sacramento, CA 95814

March 23, 2022

AB 2276 (Carrillo)
OPPOSE

Assemblymember Berman,

The **California Dental Hygienist's Association (CDHA)** requests you oppose AB 2276, a bill that would allow unlicensed dental personnel to perform irreversible dental procedures, which potentially harms the most vulnerable dental patients, children.

This bill would allow dental assistants to perform coronal polishing and to place dental sealants. Both duties are now under the scope of practice of only licensed individuals: Registered Dental Assistants (RDAs), Registered Dental Hygienists and licensed Dentists.

Both procedures are irreversible. Coronal polish uses abrasives, which remove enamel. Dental sealants require an acid etch with phosphoric acid, which creates pores in the tooth to allow the sealant material to adhere.

CDHA has met with the bill's sponsor, the California Dental Association (CDA), and Assembly Member Carrillo's office. In reviewing the fact sheet and in discussion with CDA and the author's office, we must alert members of the following:

1. Allowing unlicensed dental personnel to perform these duties with only a certification course and no formal education will compromise patient safety as these individuals would have no background knowledge of anatomy of the tooth, medical emergencies that could arise and/or corrective procedures that need to take place.
2. Parents of children needing these procedures would not be aware that the person performing these procedures was licensed or unlicensed, setting up two standards of care.
3. Coronal polish/placement of dental sealants are not reversible procedures.
4. Both procedures if done incorrectly could result in discomfort and, in the case of dental sealants, pain due to the child's bite being affected.

5. Direct supervision by the dentist does not mean dentists will oversee the procedure or watch that the procedure is being done correctly. Direct supervision merely requires the dentist to be in the office.
6. Dental assistants **cannot currently “enroll and complete courses to receive certificates through programs approved by the Dental Board to perform coronal polish and place sealants.”** Section 1073.3 and 1074 (b) of the California Code of Regulations state: Each student must possess the necessary requirements for application for RDA licensure or currently possess an RDA license. The requirements for licensure include completion of a board approved RDA educational program or 18 months of work experience.
7. There is not a documented shortage of dental assistants in California. The data presented in the fact sheet is national data. Dental Board statistics indicate that there has not been a decrease in the number of Registered Dental Assistants. The lack of unlicensed dental assistants in California is anecdotal only. Arguably, pay and employee compensation likely have a greater impact.
8. Of the states allowing dental assistants to perform these procedures, all but two states (Nevada and Arizona) require either some form of licensure or a minimum two years of work experience prior to taking certification courses for these procedures.
9. If this bill passes, Registered Dental Assistants will lose their jobs. The existing career ladder will cease to exist as these are two of the primary duties allowed to licensed dental assistants (RDAs). Dentists would no longer need to employ RDAs when a cheaper under educated workforce was available.
10. Notably, the RDA license already provides a very accessible entry into the oral healthcare profession. Currently, RDAs may become licensed either through an education/training program or two years of on the job training alone. If this bill passes, Registered Dental Assistants will lose their jobs.

CDHA strongly supports the existing career ladder for RDAs. As part of a dental team, we believe that these procedures can only be performed safely by licensed dental professionals. Our patients, especially the children, deserve to have licensed professionals doing irreversible procedures.

We respectfully request you to vote “No” on AB 2276.

Sincerely,



Heidi Coggan, RDHAP, BS
President
California Dental Hygienists' Association

cc: Members, Assembly Business & Professions Committee