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| 10-4-2021 |

Dear Dr. Michael Scialabba and Board Members of the Board of Registry in Dentistry,

My name is Amy Booth and I am writing this letter in response to CMR 234 5.11 and my concerns about authorizing non-CODA dental school’s students to take radiographs.

**My recommendation would be to delete “or a non-CODA accredited dental school” from the text.**

In CMR234 Mass. Reg 4.12 (see below) and in practice there is no way for the board to verify that a foreign (Non-CODA accredited) dental school student or graduate employed by any supervising dentist has actually completed a radiology course.

In addition, an unaccredited, foreign radiology course may not provide sufficient knowledge of radiological techniques and safety safeguards to ensure patient and team safety. Thus, this amendment is not in compliance with Massachusetts Department of Public Health’s Radiation Control Program (RCP) regulations 105 CMR 120.320: *The* RADIATION SAFETY REQUIREMENTS: Training and Testing.

**CMR234 Mass. Reg. 4.**12

The Board may grant a license to an applicant to practice as a dental assistant who is trained on the job provided that the applicant is 18 years of age or older, of good moral character, is not licensed as a dentist or dental hygienist and has submitted the following information to the Board:

**(1)** An accurate, complete and signed application, as specified by the Board for that purpose;

**(2)** Submission of the name and Massachusetts license number of the supervising licensed dentist;

**(3)** Payment of a non-refundable licensing and application fee as determined by the Executive Office of Administration and Finance, unless waived in accordance with M.G.L. c. 112, § IB

**(4)** Certified letters of standing from all jurisdictions in which the applicant has been issued a license to practice dental assisting, dental hygiene or dentistry, including a report of any past or pending disciplinary action, or any pending complaints against the applicant;

**(5)** An attestation, signed under the pains and penalties of perjury, that the applicant has read, understands and agrees to comply with *The Policy on Principles of Ethics and Code of Professional Conduct,* published by the American Dental Assistants Association;

**(6)** Documentation of current BLS certification or CPR/AED certification;

**(7)** Documentation of completed course on the CDC Guidelines;

**(8)** A statement disclosing any and all disciplinary, civil or criminal action taken or filed against the applicant at any time after reaching the age of majority and prior to the date of application, with supporting documentation as the Board may require;

**(9)** A passport-sized color photograph;

**(10)** Proof satisfactory to the Board of good moral character;

**(11)** An attestation signed under pains and penalties of perjury, that the applicant has complied with all state tax laws pursuant to M.G L. c. 62C, § 49A and child support laws pursuant to M.G.L. c. 119A, § 16(a);

**(12)** An attestation, signed under the pains and penalties of perjury, that the applicant has obtained, within one year prior to the date of application, a written statement from a physician attesting to the applicant's health and fitness to practice dental assisting, which applicant shall make available to the Board upon request; and

**(13)** If an applicant has received on-the-job training in a language other than English, the applicant shall achieve a minimum passing score, as specified by the Board, on a Board-designated test of English language proficiency.

My Best,

Amy Booth, CDA, MEd.