To: The Massachusetts Board of Registration in Dentistry

From: Concerned Dental Assistants

Re: BORID: 234CMR Proposed Regulatory Changes

Date: 10/05/2021

Dear Sir or Madam,

We, the undersigned, are dental assistants with many years of training and work experience.

Collectively, we have worked in just about every sort of dental practice imaginable. We have

seen it all. We are committed to our profession and are proud of the care we render to our

patients.

We are writing to you today to respond to the proposed regulation that would require further

education and certification for dental assistants with regard to radiological practice. While we

understand the need for constant review and assessment, and, where necessary, changes, we are

concerned about the proposed change.

First, we have not been advised of any particular need for an additional requirement. Is the

Board concerned about accuracy or safety related to dental assistants conducting radiological

evaluations? Have there been complaints or lawsuits? Certainly, none of us has seen or heard of

any complaints with regard to X-rays. There should be some publicly stated basis for this

change. Without that, respectfully, some may feel that the Board is merely adding requirements

without justification, a sentiment that could undermine the credibility of the Board among dental

assistants.

Second, as experienced professionals we can attest that radiological evaluations in the setting of

a dental office have remained fairly consistent for many years. While machines are upgraded

over time, the taking of X-rays is largely unchanged. We do not see in our current practice, or on

the horizon, technological changes that would necessitate the cost of additional education.

Third, it is not clear what happens if a dental assistant, even one with many years of experience,

fails the certification exam. Some people are simply not good test-takers, especially if they have

been out of school for many years. Would that person no longer be able to take X-rays? We are

sure you can understand how that would most likely lead to an immediate termination.

Lastly, the value of our profession has diminished over the years. Relative to other healthcare

workers dental assistant salaries have diminished significantly. We are now working harder for

less money. That is the simple reality of our profession at this point in time. Many dental

assistants, particularly younger assistants, are leaving the profession after years of education and

training because they do not see a bright future and can make better money elsewhere. Adding a

further costly requirement, both in terms of time and money, will further diminish our

profession. We would hope that the Board might take the time to examine this particular point as

the very future of our practice is at stake.

For the record, respectfully, we are opposed to these changes. We feel they are unnecessary and

costly. At the very least there should be some special consideration for dental assistants who

have practiced over twenty years, for whom finding a new career would be extremely difficult.

We feel that that our patients would be better served if the Board instead looked into issues of

job satisfaction among dental assistants and what may be done to bring about greater respect for

our profession.

Sincerely,

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