**From:** Viktoria Pikler

**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** BORID: 234 CMR

**Date:** Monday, October 4, 2021 8:35:32 PM

Dear Chairman and Members of the Board of Registration in Dentistry,

I am a Certified Dental Assistant for more than 10 years. I also taught dental assistant students for two years.

I oppose the regulatory change to allow on-the-job-trained dental assistants to:

1, take radiographs without needing to submit any proof of completion of a certified course in Radiological Safety and Techniques from an approved program. I am concerned that this will cause increase risks of unnecessary excessive radiation exposure from the on-the-job trained dental assistants repeatedly retaking the x-ray in an effort to get diagnostic quality radiographs.

2, adjust and recement temporary crowns and fillings intraorally, make temporary crowns, adjust nightguards, fit stainless steel crowns on children’s teeth and take impressions under immediate supervision. These procedures should not be allowed to do without proper approved program and school training.

3, take impressions for retainers, intraorally place bands for braces, adjust ligature wires, and fit and place arch wires on children’s teeth with general supervision.

Sincerely,

Viktoria Pikler, CDA 21 Drummer Road

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