

COLORADO DEPARTMENT OF REGULATORY AGENCIES
OFFICE OF POLICY AND RESEARCH

EXPANDED FUNCTIONS DENTAL ASSISTANTS

2002 SUNRISE REVIEW



STATE OF COLORADO

DEPARTMENT OF REGULATORY AGENCIES
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Bill Owens
Governor

October 15, 2002

Members of the Colorado General Assembly
c/o the Office of Legislative Legal Services
State Capitol Building
Denver, Colorado 80203

Dear Members of the General Assembly:

The Colorado Department of Regulatory Agencies has completed its evaluation of the sunrise application for regulation of expanded functions dental assistants and is pleased to submit this written report. The report is submitted pursuant to section 24-34-104.1, Colorado Revised Statutes (C.R.S.), which provides that the Department of Regulatory Agencies shall conduct an analysis and evaluation of proposed regulation to determine whether the public needs, and would benefit from, the regulation.

The report discusses the question of whether there is a need for regulation in order to protect the public from potential harm, whether regulation would serve to mitigate the potential harm, and whether the public can be adequately protected by other means in a more cost-effective manner.

Sincerely,

M. Michael Cooke
Executive Director

Table of Contents

The Sunrise Process.....	1
<i>Background</i>	<i>1</i>
<i>Methodology</i>	<i>2</i>
Proposal for Regulation.....	3
<i>Profile of the Profession</i>	<i>4</i>
Summary of Current Regulation.....	8
<i>The Colorado Regulatory Environment</i>	<i>8</i>
<i>Regulation in Other States</i>	<i>9</i>
Analysis and Recommendation.....	13
<i>Public Harm</i>	<i>13</i>
<i>Need for Regulation</i>	<i>14</i>
<i>Alternatives to Regulation</i>	<i>14</i>
<i>Conclusion</i>	<i>15</i>
Appendix A – State Comparison of the Regulation of Dental Assistants	17

The Sunrise Process

Background

Colorado law, section 24-34-104.1, Colorado Revised Statutes (C.R.S.), requires that individuals or groups proposing legislation to regulate any occupation or profession first submit information to the Department of Regulatory Agencies (DORA) for the purposes of a sunrise review. The intent of the law is to impose regulation on occupations and professions only when it is necessary to protect the public health, safety or welfare. DORA must prepare a report evaluating the justification for regulation based upon the criteria contained in the sunrise statute:

(I) Whether the unregulated practice of the occupation or profession clearly harms or endangers the health, safety, or welfare of the public, and whether the potential for the harm is easily recognizable and not remote or dependent upon tenuous argument;

(II) Whether the public needs, and can reasonably be expected to benefit from, an assurance of initial and continuing professional or occupational competence; and

(III) Whether the public can be adequately protected by other means in a more cost-effective manner.

Any professional or occupational group or organization, any individual, or any other interested party may submit an application for the regulation of an unregulated occupation or profession. Applications must be accompanied by supporting signatures and must include a description of the proposed regulation and justification for such regulation. Applications received by July 1 must have a review completed by DORA by October 15 of the year following the year of submission.

Methodology

DORA has completed its evaluation of the proposal for regulation of expanded functions dental assistants. During the sunrise review process, DORA performed a literature search, contacted and interviewed the applicant, reviewed licensure laws in other states, surveyed administrators of those programs, and contacted the Colorado Association of Dental Assistants. In order to determine the number and types of complaints filed against dental assistants in Colorado, DORA contacted representatives of the Denver District Attorney's Office, the Denver/Boulder Better Business Bureau, the Office of the Attorney General Consumer Protection Section, the Colorado Board of Dental Examiners, and the Governor's Advocacy Office.

Proposal for Regulation

The Colorado Dental Assistant's Association (Applicant) has submitted a sunrise application to the Department of Regulatory Agencies (DORA) for review in accordance with the provisions of section 24-34-104.1, Colorado Revised Statutes (C.R.S.). The Applicant is requesting only title protection that would include defining the qualifications and educational requirements for persons using the titles "expanded duties dental assistant" and/or "expanded functions dental assistant."

The Applicant proposes that the title "expanded functions dental assistant" (EFDA) be protected, but no one would be precluded from performing the same functions. Furthermore, the applicants state that minimum competencies for the EFDA would include a working knowledge of dental terminology, knowledge of chairside procedures, basic understanding of head and neck anatomy and physiology, and specific knowledge of individual tooth anatomy. Moreover, the Applicant contends that EFDAs would be required to have advanced skills in manipulation and use of a variety of dental materials, mastery of instrument and tray set up for a variety of dental procedures, knowledge in management of emergencies in the dental office, knowledge of infection control procedures, and skills in intraoral and extraoral radiography. Additional qualifications would include six months clinical and chairside experience in general dentistry and certification in cardiopulmonary resuscitation (CPR).

The Applicant further maintains that title protection would help to retain quality assistants and further recruitment of candidates in this field. In addition, the Applicant asserts that title protection would provide the opportunity to recognize the educational achievement of persons that have been formally trained. The Applicant contends that many assistants are discouraged from seeking formal training because there is no mechanism in place to distinguish them from assistants who do not have the specific educational experience.

Profile of the Profession

The majority of dental assistants work in private dental offices, but a limited number work in dental schools, private and government hospitals, state and local public health departments, and clinics. A licensed dentist supervises all the functions of dental assistants.

In general, chairside dental assistants (chairside assistants) perform a variety of patient care, office, and laboratory duties. They work at chairside while dentists examine and treat patients. They prepare patients for treatment, assist with instruments and materials, sterilize and disinfect instruments and equipment, prepare tray setups for dental procedures, and instruct patients on postoperative and general oral health care. Dental assistants may expose radiographs and process dental x-ray film as directed by a dentist. Dental assistants with office duties may schedule and confirm appointments, maintain treatment records, and order dental supplies and materials.

Nationally, it is generally agreed in the dental community that duties unique to EFDAs involve restorative procedures. These include such procedures as placing matrix bands and wedges, preparing and placing cement bases and liners, placing and carving amalgam restorations, placing and finishing tooth colored restorative material, and positioning gingival retraction cord. Additionally, EFDAs take final impressions for fixed and removable prosthetics, fabricate and cement temporary crowns, cement permanent crowns, and place pit and fissure sealants.

Dental assistants' education and training vary. A majority of dental assistants become skilled during employment, though some are trained in dental assisting programs offered by community and junior colleges, trade schools, technical institutes, and the Armed Forces.

The Commission on Dental Accreditation (Commission) operates under the auspices of the American Dental Association (ADA). The Commission approved 251 dental assisting training programs in 1999. Programs include classroom, laboratory, and preclinical instruction in dental assisting skills and related theory. In addition, students gain practical experience in dental schools, clinics, or dental offices. Most programs leading to a certificate or diploma consist of a one-year curriculum or less to complete. Two-year programs offered in community and junior colleges lead to an associate degree. Some private vocational schools offer four to six month courses in dental assisting, but the Commission on Dental Accreditation generally does not accredit these programs.

The Colorado School of Dental Assisting offers a Certificate of Completion for dental assisting. The registration fee for the course is \$2,295 and includes 196 class hours, laboratory experience, and a six-week externship at a local dental office. In general, classes teach orientation to dentistry, disinfecting and sterilization procedures, treatment room care, dental anatomy, radiography, usage of instruments and cements, pain and anxiety control, surgery and prosthodontics, and front office techniques. Included in this program is a class on expanded functions for dental assistants that addresses the placement of sealants and other measures in preventative dentistry, assistance during restorative treatments, amalgam and composite fillings, as well as crown and bridge restorations.

Programs offering training specifically for expanded functions dental assistants in Colorado are located at Pikes Peak Community College, Front Range Community College, and the University of Colorado School of Dentistry Continuing Education.

Students who wish to pursue the Associate of Applied Science (AAS) Degree in Dental Assisting at Pikes Peak Community College must be a graduate of an ADA accredited dental assisting certificate program, be a certified dental assistant, or have two years of full time experience as a dental assistant.

Students participating in the AAS Degree program receive instruction in laboratory and clinical experience in expanded functions as permitted by the Colorado Dental Practice Act. The expanded duties course at Front Range Community College introduces techniques and concepts used by the dental assistant in expanded functions. Prerequisites for the course include graduation from an ADA accredited dental assisting program or two years of current dental assisting experience or graduation from a non-accredited dental assisting program and one year current dental assisting work experience.

The table below illustrates the fee and time commitment for the programs offered in Colorado.

Table 1
Colorado Programs
Expanded Functions Dental Assistants

School	Location	Length of Course	Fee
Pikes Peak Community College	Colorado Springs	180 contact hours (4 credit hours for 2 semesters)	\$543.00
University of Colorado, School of Dentistry Continuing Education	Denver	38 hours	\$575.00
Front Range Community College	Ft. Collins	68-90 hours	\$325.00

Private certification for dental assistants is available through the Dental Assisting National Board (DANB), a nationally recognized certification and credentialing agency recognized by the American Dental Association. To earn this certification, an assistant must pass an examination comprised of three components – radiation health and safety, infection control, and general chairside assisting.

In several states that have adopted standards for dental assistants who perform radiological procedures, completion of the DANB certification examination meets those standards. Candidates qualify to take the certification examination if they have graduated from an ADA accredited training program or have two years of full-time experience as a dental assistant. In addition, applicants must have current certification in CPR.

The American Medical Technologists (AMT) is a nonprofit certification agency and professional membership association representing 25,000 plus individuals in allied health care. Certification from the AMT for a registered dental assistant requires graduation from a dental assistant program or institution accredited by an agency recognized by the U.S. Department of Education or the Commission on the Recognition of Postsecondary Accreditation. Additional requirements include employment in the occupation for a minimum of three years, recommendation from a dental employer, and certification in CPR.

Summary of Current Regulation

The Colorado Regulatory Environment

Approximately 30 dental assistants are members of the Colorado Dental Assistant Association.

There are no Colorado statutes or local or county laws that specifically require registration, certification, or licensure of dental assistants or expanded functions dental assistants (EFDA). There is however, section 12-35-103(1), Colorado Revised Statutes (C.R.S.), in the Colorado Dental Practice Law that defines a “dental auxiliary” (more often referred to as a dental assistant) as any person not a dentist or dental hygienist licensed in Colorado who may be assigned or delegated to perform dental tasks or procedures defined by law.

Section 12-35-125, C.R.S., is specific as to the procedures that a dental auxiliary may perform. An auxiliary may perform the following tasks under the personal direction of a licensed dentist: smoothing and polishing tooth surfaces, applying fluorides and other recognized topical agents for the prevention of oral disease, gathering and assembling information for patient histories, oral mouth charting and inspection, and administering topical anesthetic. They may also perform any other task or procedure that does not require the professional skill of a licensed dentist or licensed dental hygienist. Additionally, a dental auxiliary may perform intraoral and extraoral tasks and procedures for constructing dentures under the general supervision of a licensed dentist.

Colorado law requires that the tasks performed for the construction of full dentures by dental auxiliaries occur in the office of a licensed practicing dentist. The law places restrictions on how many offices licensed dentists may maintain in which dental auxiliaries perform these tasks and requires that dentists use no more dental auxiliaries than they can reasonably supervise. The dentist remains responsible for any delegated act and is subject to disciplinary action for any violations resulting from actions of a dental assistant.

Regulation in Other States

As part of this sunrise review, the Department of Regulatory Agencies (DORA) examined the statutes of other states to determine whether and how they regulate both chairside dental assistants (chairside assistant) and EFDAs.

EFDA regulation currently exists in 18 states. The requirements for chairside assistants and EFDAs vary from state to state. This section will discuss the 18 states that have established either certification or registration for EFDAs and their respective requirements. It should be noted that all chairside assistants and EFDAs must be under the supervision of the treating dentist. Appendix A beginning on page 17, further illustrates the type of regulation and requirements for registration or certification of both chairside assistants and EFDAs in all 50 states.

When contacting representatives from all 50 states, DORA also inquired as to the nature and level of complaint and disciplinary activity imposed on dental assistants. The states reported a minimal number of complaints filed against dental assistants and relatively few or no disciplinary actions imposed.

The following states regulate or acknowledge EFDAs in some capacity:

Arkansas A dental assistant who performs expanded functions must have 12 months experience within the past five years as a chairside assistant or have graduated from a program accredited by the Commission on Dental Accreditation or has received certification from the Dental Assisting National Board (DANB). The expanded functions include inducing and monitoring nitrous oxide analgesia and polishing the crowns of teeth.

California Before performing certain expanded duties, dental personnel must take additional training and receive certification. To be eligible for an extended functions license that includes coronal polishing and/or ultrasonic scaling, registered dental assistants are required to pass a state clinical examination.

Idaho A dental assistant may be considered board qualified in expanded functions by completing the DANB certification program or successfully completing a board-approved course. The expanded functions include placing and removing temporary restorations, mechanical polish restorations, monitoring the patient while nitrous oxide is being administered, applying pit and fissure sealants, and performing coronal polishing.

Iowa To qualify as a registered dental assistant, an individual must work as a dental assistant trained for six months, have at least six months of experience as a dental assistant within the past two years, or be a graduate of a dental assisting program.

Louisiana A licensed dentist may delegate to any expanded functions dental assistant any chairside dental act that the dentist deems reasonable. However there are 17 practices, including placement of pit and fissure sealants, administration of a local anesthetic, and root planning that can not be delegated.

Maine Certified dental assistants may remove sutures, place temporary fillings on an emergency basis, and remove excess cement from the supragingival surfaces of teeth under the general supervision of a dentist.

Maryland Expanded functions dental assistants must have 24 hours of formal education, six months on the job experience, and have passed the DANB Radiation Health and Safety (RHS) examination which is designed to determine competency in dental radiation health and safety for personnel performing dental radiography procedures.

Missouri The Missouri Dental Board has approved 19 expanded functions for dental assistants in the areas of operative and prosthetic dentistry, periodontics, and orthodontics. In order for dental assistants to perform expanded functions, they must pass the Missouri Basic Dental Assisting Skills Mastery Examining administered by DANB, complete a board-approved expanded functions course, and provide proof of competence in each expanded function.

New Mexico To qualify as an expanded functions dental assistant to perform dental radiography, rubber cup coronal polishing, placement of topical fluoride, and placement of pit and fissure sealants, individuals must have successfully completed a training course or have a letter of certification from a supervising dentist or dental hygienist attesting to the completion of a self-study training course.

New York A certified dental assistant may place and remove rubber and matrix dams, select and prefit provisional crowns and orthodontic bands, remove orthodontic arch wires and ligature ties, take impressions for study or diagnostic casts, and remove periodontal dressings. To qualify, individuals must have successfully completed a New York State of Education approved program in dental assisting.

North Carolina There are two classifications of dental assistants: dental assistant I and dental assistant II. A dental assistant II may perform expanded functions but must have completed at least one year in an American Dental Association (ADA) accredited school of dental assisting or dental hygiene, or successfully pass the DANB examination, or experience 3,000 hours of full-time employment as a chairside dental assistant.

Ohio Expanded functions dental assistants under the direct supervision of a licensed dentist may place sealants and perform advanced remediable intraoral dental tasks and/or procedures. They must have successfully passed the state designated examination for expanded functions dental assistants.

Oklahoma Individuals who successfully complete expanded functions training at a formal dental assisting program approved by the board and the Commission on Dental Accreditation are eligible to receive a permit to expose intraoral and extraoral radiographs, polish coronal surfaces of teeth, place pit and fissure sealants, and assist a dentist in the administration of nitrous oxide.

Oregon To perform expanded functions, dental assistants must obtain a certification from DANB. These functions include polishing coronal surfaces of teeth, placing pit and fissure sealants, removing temporary crowns for final cementation, placing temporary restorative material, placing and removing matrix retainers, and removing excess supragingival cement from crowns.

Pennsylvania To be certified as an expanded functions dental assistant, persons must have graduated from an expanded functions dental assisting program at a two-year college or other institution accredited by an accrediting agency approved by the U.S. Department of Education Council on Postsecondary Accreditation, or graduated from a dental hygiene school which requires 75 hours of clinical and didactic instruction in restorative functions, or have completed a certification program in expanded functions dental assisting of at least 200 hours accredited by the Commission on Dental Accreditation or an accrediting agency approved by the U.S. Department of Education Council on Postsecondary Accreditation.

South Carolina An expanded functions dental assistant must have graduated from an ADA accredited dental assisting program, or have completed two years of continuous full-time employment as a chairside dental assistant. Expanded functions dental assistants may take impressions for study models, place and remove socket dressing, place gingival retraction cord, place temporary restorations, cement temporary crowns or bridges, remove excess cement from restorations, apply pit and fissure sealants, and monitor nitrous oxide upon completion of a board-approved course.

South Dakota To qualify as an expanded functions dental assistant, one must have graduated from an ADA accredited dental assisting school, be a certified dental assistant, or have successfully passed an exam approved by the board.

Vermont A certified dental assistant may perform expanded dental duties provided that he/she has successfully completed a formal program in expanded functions in an ADA accredited school of dental assisting.

Analysis and Recommendation

Public Harm

The first sunrise criterion asks:

Whether the unregulated practice of the occupation or profession clearly harms or endangers the health, safety or welfare of the public, and whether the potential for harm is easily recognizable and not remote or dependent on tenuous argument.

The Colorado Dental Assistant's Association (Applicant) has not submitted information demonstrating that harm to the public has occurred, or that the public is endangered by the threat of potential harm from the unregulated practice of expanded functions dental assistants.

Similarly, no such instances of harm could be found by the Department of Regulatory Agencies (DORA) through its inquiries to the Denver/Boulder Better Business Bureau, the Office of the Attorney General Consumer Protection Section, the Governor's Advocacy Office, or the Colorado State Board of Dental Examiners.

While allowing that documenting financial and physical harm may be difficult, this review found no evidence of harm being caused to Colorado consumers by the unregulated practice of expanded function dental assistants (EFDAs).

In addition, the Applicant argues that unqualified dental assistants are performing expanded functions without proper training or experience. However, this is anecdotal only, and DORA was unable to confirm that such stories are true. Furthermore, DORA was not able to obtain, and the Applicant did not provide, any direct evidence of this allegation.

It is not clear that the public health, safety, and welfare will be better protected by title protection for expanded functions dental assistants when the same practices can still be performed by those who do not call themselves EFDAs.

The results of regulation in other states do not support the argument to regulate in Colorado. The lack of need to regulate EFDAs in Colorado is supported by contact with other states that have chosen to regulate in this area. Of the states with specific requirements and regulations for expanded functions dental assistants, few have received complaints or taken disciplinary actions.

Need for Regulation

The second sunrise criterion asks:

Whether the public needs and can reasonably be expected to benefit from an assurance of initial and continuing professional or occupational competence.

This criterion speaks to the proposition of whether or not the state should require a certain level of education and/or impose a requirement that practitioners pass an examination before being licensed to practice in Colorado.

No evidence has been presented that demonstrates Colorado practitioners lack the skills, education or competence necessary to practice safely. Neither an initial educational requirement, examination requirement nor continuing education are needed to safeguard Colorado consumers.

Alternatives to Regulation

The third sunrise criterion asks:

Whether the public can be adequately protected by other means in a more cost-effective manner.

Private certification is offered by the Dental Assisting National Board (DANB), a nationally recognized certification and credentialing agency recognized by the American Dental Association. The American Dental Association recognizes DANB as the national certification agency for dental assistants. This recognition is supported by the Academy of General Dentistry, the Academy of Oral and Maxillofacial Radiology, the American Academy of Dental Practice Administration, the American Association of Dental Examiners, the American Dental Education Association, and the American Dental Assistants Association.

In addition to the private certification, another public protection mechanism already exists. Colorado law currently permits dental assistants to practice under the direct, on-site supervision of a licensed dentist. Thus, indirectly, regulation of the practice of dental assistants and those who perform expanded functions already exists. Under Colorado's current regulatory scheme, dentists act as gatekeepers to dental healthcare services. Since a dentist must supervise the dental assistant, the dentist will already have determined the treatment for the patient. The consumer is protected financially because the dentist is ultimately responsible for the treatment. It is reasonable to assume that since the dentist is liable administratively, in terms of his/her license, and civilly, in terms of malpractice, the dentist will take reasonable steps to ensure that the individual he/she supervises is competent.

Conclusion

Given the data submitted and obtained during this review, and given that the current practice of dental assistants has not resulted in significant harm to Colorado consumers, this sunrise review concludes that title protection for expanded functions dental assistants is not necessary.

While the proposed regulation would restrict the use of the titles, it is doubtful that it would significantly impact the public health and safety because anyone would still be allowed to partake in the expanded functions activities under the supervision of a dentist.

The central issues involved in this sunrise review are protecting the public health and welfare. The primary justification for regulating dentists is to better protect the public health. Patients are protected by virtue of the fact that a dentist is present and supervising the dental assistant. In general, when visiting the dentist, the public is not cognizant of the difference between a chairside dental assistant and an EFDA, or that a difference even exists. As expressed by the Applicant, title protection (certification) would provide the opportunity to recognize the educational achievement of persons that have been formally trained. This proposal is more a marketability issue for the EFDAs whereby they will be more marketable to dentist employers.

At this time, DORA does not find that the Applicant has proven the need for title protection of expanded functions dental assistants.

Recommendation – The General Assembly should not implement the Applicant’s proposal to create title protection for expanded functions dental assistants.

Appendix A – State Comparison of the Regulation of Dental Assistants

State	Type of Regulation for Dental Assistants				EDUCATION REQUIRED	EXAMS/EXPERIENCE REQUIRED	EXPANDED FUNCTIONS	Special Training Need for Procedures			
	NONE	CERTIFICATION	REGISTRATION	LICENSURE				RADIOGRAPHS	CORONAL POLISHING	NITROUS OXIDE	SEALANTS
AL	√										
AK	√										
AR	√				ADA accredited program	12 months experience within the past 5 years or DANB certification	Registration	√	√	√	
CA			√		ADA accredited program	Written and practical examinations	Completion of 90 hour course	√	√		
CO	√							√		√	
CT	√							√			
DE	√										
FL	√										
GA	√										
HI	√										
ID	√					DANB certification or board approved course	Certification		√	√	√
IL		Private Certification							√	√	√
IN	√							√			
IA			√		ADA accredited program	6 months experience	Effective 7/1/2002	√			
KS	√										
KY		√			ADA accredited	1 year experience		√	√		
LA	√						Registration				
ME	√						Certification	√			
MD	√				24 hours of formal education for EFDAs	DANB examination & 6 months experience for EFDAs	Certification	√			
MA		√				DANB certification		√	√		√

State	Type of Regulation for Dental Assistants				EDUCATION REQUIRED	EXAMS/EXPERIENCE REQUIRED	EXPANDED FUNCTIONS	Special Training Need for Procedures			
	NONE	CERTIFICATION	REGISTRATION	LICENSURE				RADIOGRAPHS	CORONAL POLISHING	NITROUS OXIDE	SEALANTS
MI				√	Graduate of school accredited by Comm. On Dental Accreditation	Comprehensive and clinical examination					
MN			√			Board approved examination		√			
MS	√							√			
MO		√			DANB certification for dental assistants		Requires competency testing			√	
MT	√							√			
NE	√							√	√		
NV	√										
NH	√							√			
NJ	√							√			
NM		√			DANB certification for dental assistants		Requires documentation of abilities by certification or from dentist or dental hygienist	√	√		√
NY				Only EFDAs		U.S. Department of Education or state approved examination	1 year course in dental assisting				
NC	√					1 year ADA accredited program or DANB examination or 3000 hours of chairside experience	Dental Assistant II	√			
ND	√							√			

State	Type of Regulation for Dental Assistants				EDUCATION REQUIRED	EXAMS/EXPERIENCE REQUIRED	EXPANDED FUNCTIONS	Special Training Need for Procedures			
	NONE	CERTIFICATION	REGISTRATION	LICENSURE				RADIOGRAPHS	CORONAL POLISHING	NITROUS OXIDE	SEALANTS
OH	√					Board approved examination	Certification	√			
OK	√				Board approved program and Commission on Dental Accreditation program		Permit required	√	√	√	√
OR	√						DANB certification required	√	√		√
PA	√				Commission on Dental Accreditation program	Practicing for at least 5 years prior to 1994 may qualify for certification without education requirements	Certification				
RI	√							√			√
SC	√				ADA Accredited program or 2 years chairside employment		Certification			√	√
SD	√				ADA Accredited program	Board approved or DANB examination	Certification	√			
TN			√		ADA Accredited program	State examination			√	√	
TX	√							√			√
UT	√							√			

State	Type of Regulation for Dental Assistants				EDUCATION REQUIRED	EXAMS/EXPERIENCE REQUIRED	EXPANDED FUNCTIONS	Special Training Need for Procedures			
	NONE	CERTIFICATION	REGISTRATION	LICENSURE				RADIOGRAPHS	CORONAL POLISHING	NITROUS OXIDE	SEALANTS
VT		√			Commission on Dental Accreditation program for EFDAs	DANB certification for dental assistant 50 hours or didactic training and 5 weeks of clinical training for EFDAs	Certification	√			
VI	√							√			
WA	√										
WV	√										
WI	√										
WY	√							√			