

June 6, 2016

Mr. Ken Levine, Director  
Sunset Advisory Commission  
6<sup>th</sup> Floor, Robert E. Johnson Building  
1501 N. Congress Avenue  
PO Box 13066  
Austin, TX 78711

Dear Mr. Levine, Sunset Staff, and Honorable Members of the Sunset Advisory Commission,

As Presiding Officer of the Dental Laboratory Certification Council (DLCC), a statutory committee of the State Board of Dental Examiners, please find below my response to the recent review, and subsequent Sunset staff report regarding the State Board of Dental Examiners (SBDE), and especially the role of the DLCC.

I strongly disagree with the recommendation of the Sunset's staff review, to dissolve the DLCC.

Although members of the Sunset staff attended the DLCC meeting on February 8, 2016, I do not believe, after one meeting, and without any Council Member interviews, that they went away with a full and complete understanding of what the DLCC does. Because the DLCC is comprised of three members, we were unable to go into new business due to an unexpected resignation of a Council Member and the term expiration of another, we had to propose two new members and wait for their approval from the SBDE.

The DLCC has met several times, and at length, above our statutory requirement in the last two years in order to overhaul the outdated laboratory applications and renewal forms. This also required coordination with online renewals, and the information gathered there. We also, with the help of the legal staff, have clarified many of the rules and regulations for dental lab registrations.

With the active participation of the DLCC over the past three years, including over 800 interactive emails to the SBDE staff, I feel that we are just getting started in reviewing and asking for clarification on rules and regulations.

Currently there are 956 Certified Dental Technicians (CDT's) and 752 Active Registered Labs in Texas. While numbers may be smaller than other stakeholders, dental laboratories play a very unique role in the dental community.

Many dentists depend on their laboratories for consultation and advice regarding materials and restoration types for their patients. With new challenges emerging, like "All On Four" implant and conversion denture technology which, many times, involves the Certified Dental Technician chairside with the dentists, the DLCC needs to continue our proactive approach in educating and working alongside the Board members, and staff on the Certified Dental Technician role while keeping the patient's safety a priority.

Commercial dental laboratories are the only stakeholders that are not direct employees of a dentist, yet Texas dental laboratories have never been allowed a representative on the SBDE like other stakeholders and, therefore, would have no advocates, even though we play such a vital role in patient care.

The U. S. Food and Drug Administration categorizes dental laboratories as manufacturers of medical devices, and everything we deliver to the dentist, by fulfilling a provided prescription by the dentist, is a “patient contact material.”

We believe, for the patient’s protection, that dental laboratories need to be registered, and monitored by people who understand their function.

The Dental Laboratory Certification Council consists of dental laboratory owners, who are Certified Dental Technicians that have gone through rigorous certification processes through the National Board for Certification in Dental Technology.

We have seen a lot of SBDE staff turnover in the last two years. There is no one currently on staff for the SBDE that has a working knowledge of dental laboratories, or their role in the dental industry. We continue to educate the staff that we directly work with, on the unique function of dental laboratories.

Unlike the Dental Hygiene Advisory Committee, the DLCC, not only approves each new dental laboratory application for registration, but we also review each renewal application for discrepancies, and there are many discrepancies on a yearly basis that the SBDE staff has overlooked.

If the DLCC does not exist, and laboratory applications and renewal approvals are left solely up to the staff, and if training for staff only comes from within, they are going to be sorely unprepared, due to their current and historical lack of knowledge on how dental laboratories function.

Patient safety must be put first, and the DLCC needs to continue our proactive approach in educating and working alongside the Board members, and staff on the Certified Dental Technician role while keeping the patient’s safety a priority.

Respectfully submitted,

A handwritten signature in cursive script that reads "Brenda Triplett".

Brenda Triplett, CDT  
Presiding Officer, 2015-2016 Dental Laboratory Certification Council  
DLCC Member since 2014

2016 Dental Laboratory Certification Council Members;  
Elyese Anderson, CDT  
Lee Anne Mixson-Sibila, CDT