



April 22, 2016

Sunset Advisory Commission
Robert E. Johnson Building, 6th Floor
1501 North Congress Avenue
Austin, Texas 78701

Via email to sunset@sunset.texas.gov

Dear Sunset Commission,

Thank you for the opportunity to provide comments on the Sunset Staff Report of the State Board of Dental Examiners. Career Colleges & Schools of Texas (CCST) is our state's oldest and largest stakeholder group representing post-secondary career education colleges and universities. Our member institutions are responsible for preparing a significant portion of Texas' allied healthcare workforce. We write today expressing our strong opposition to Recommendation 2.1. The recommendation to discontinue the board's dental assistant certificate program, if implemented, would immediately put the public at risk and cost the state over \$1 million per year.

Dental assistant work varies, and the Legislature appropriately recognizes that some of this work should require, *at a minimum*, a base level of career training. The current certificate programs provide this and they should not be eliminated. Critical public health and safety topics such as basic life support training, infection control, and oral anatomy are just some of the important subjects covered in training. A predominant portion of the curriculum deals with patient safety and comfort, ensuring that future dental assistants have the training required to properly serve the public. Removing requirements all together will mean that a person could perform the work of a dental assistant without any training whatsoever.

CCST disagrees with staff comments that since assistants must work under the direction of a licensed dentist, they are unlikely to injure patients and that since a low complaint volume exists, the certificate programs and the critical training they provide are not needed. To the contrary, the mere fact that supervision is required does not eliminate the need for someone using specialized tools that require specialized training to actually have that training. A low complaint volume indicates that the program is working, because proper training produces competent and capable dental assistants.

The presence of a licensed dentist overseeing an assistant does not negate the need – and public expectation – that the dental assistant have training before interacting with patients. Keeping the requirement for this training in state law, therefore, is critical to maintaining public safety.

The staff report indicates that implementing Recommendation 2.1 will cost the state at least \$1.4 million dollars annually. Accepting Recommendation 2.1 will lead to decreased public safety and increased cost. We urge Sunset Commission members to either oppose or modify this dangerous recommendation.

Please do not hesitate to contact me at 512-477-1117 or via email at valdez@thevaldezcompany.com with any questions or comments. You can also visit www.ccst.org to learn more about our organization. Again, thank you for the opportunity to provide commentary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jerry Valdez". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jerry Valdez
Executive Director
Career Colleges & Schools of Texas