



# Dental Assisting National Board, Inc.

*Measuring Dental Assisting Excellence*<sup>®</sup>

January 16, 2015

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Dear Dr. Stuberg and Distinguished Members of the 407 Technical Review Committee:

In connection with the proposal of the Nebraska Dental Association (NDA) and Nebraska Dental Assistants Association (NDAA) that is currently under consideration, the Dental Assisting National Board, Inc. (DANB) would like to submit the following information about DANB exams and DANB services, which may be of interest to the committee as it considers the proposal. DANB's comments also contain a suggestion for revision of the proposed regulatory language relating to DANB's exams and some observations about trends in dental assisting expanded functions nationwide.

## About DANB

DANB is the American Dental Association-recognized national certification board for dental assistants. DANB's mission is to promote the public good by providing credentialing services to the dental community. DANB administers the nationally recognized Certified Dental Assistant (CDA) certification program and a series of other certifications and knowledge-based competency examinations for dental assistants. DANB's exams and certifications are required or meet a part of requirements for dental assistants to qualify to perform prescribed duties in 38 states, the District of Columbia, the Department of Veterans Affairs, and the U.S. Air Force. DANB's eligible exam programs are accredited by the National Commission for Certifying Agencies (NCCA) and are developed according to the *Standards for Educational and Psychological Tests*, co-published by the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education.

## Recognition Within the Dental Community

As noted above, DANB is recognized by the American Dental Association (ADA) as the national certification board for dental assistants. This recognition is supported by the American Association of Dental Boards (AADB), the American Dental Education Association (ADEA), the American Academy of Oral and Maxillofacial Radiology (AAOMR), the Academy of General Dentistry (AGD), the American Dental Assistants Association (ADAA) and the Organization for Safety, Asepsis and Prevention (OSAP).

DANB works with major dental organizations, including the ADA, AADB, ADEA, ADAA, AGD, AAOMR, OSAP, American Association of Orthodontists (AAO) and American Association of Dental Office Managers (AADOM).

DANB receives crucial input from leaders in the dental profession regarding what is important in terms of exam policy and content. The ADA, AADB, ADEA and ADAA each provide a slate of candidates for election to DANB's Board of Directors. The AGD, AAO, AAOMR, AADOM, OSAP and the American Board of Oral and Maxillofacial Radiology (ABOMR) each provide a slate of candidates for consideration to serve on DANB's exam committees.

The Commission on Dental Accreditation (CODA), an ADA-affiliated agency, requires non-dentist program directors and laboratory, preclinical and clinical faculty in CODA-accredited dental assisting programs to hold a current national DANB certification. CODA encourages CODA-accredited dental assisting programs to use student performance on DANB exams, particularly the Certified Dental Assistant (CDA) exam, as an outcome measure when assessing the program's continued ability to meet CODA accreditation standards.

### **About DANB's Certified Dental Assistant (CDA) Exam**

The NDA/NDAA proposal calls for applicants for dental assistant licensure to pass DANB's Certified Dental Assistant (CDA) exam and to hold current CDA certification at the time of application. DANB's CDA exam is a multiple-choice exam, developed according to an exam blueprint derived from a formal job analysis and updated pursuant to periodic content validation studies. DANB's Certified Dental Assistant (CDA) exam consists of three component exams: the Radiation Health and Safety (RHS) exam, the Infection Control exam (ICE), and General Chairside (GC). These three components can be taken in one exam administration or taken individually. A candidate must pass the three components within a five-year period to earn the CDA certification.

To take the full CDA exam or the GC component of the CDA exam, a dental assistant must meet the requirements of one of three eligibility pathways. Pathway I requires graduation from a dental assisting program accredited by the Commission on Dental Accreditation (CODA); Pathway II requires a high school diploma or equivalent and 3,500 hours of work experience accrued over a period of two to four years; Pathway III is for former CDA certificants and U.S.- or foreign-trained dentists who wish to sit for the CDA exam. All pathways require current DANB-accepted CPR, BLS, or ACLS certification.

As of the date of this letter, there are more than 35,000 dental assistants nationwide who currently hold DANB's CDA certification.

For those committee members interested in additional information about the DANB CDA certification program, we are attaching a brief CDA Overview, marked as Appendix A.

### **Nebraska Data: Holders of DANB Certification and Certificates of Knowledge-Based Competency**

As of January 14, 2015, there are 346 dental assistants living in Nebraska who hold the DANB's CDA certification. There are 722 Nebraska residents who have passed DANB's Radiation Health and Safety (RHS) exam and 760 who have passed DANB's Infection Control exam (ICE). The RHS and ICE exams are two of the three components of the CDA certification and also lead to standalone certificates of knowledge-based competency in radiation health and safety and infection control.

### **About DANB's Certified Restorative Functions Dental Assistant (CRFDA) Exam**

The NDA/NDAA proposal calls for permits to be issued to licensed dental assistants for the performance of restorative functions, in accordance with regulations to be set forth by the Nebraska Board of Dentistry.

DANB offers a series of examinations addressing many of the expanded functions that are included in the NDA/NDAA proposal. DANB's Certified Restorative Functions Dental Assistant (CRFDA) certification consists of six component exams: Anatomy, Morphology and Physiology (AMP), Impressions (IM), Temporaries (TMP), Isolation (IS) – covering matrices, wedges, dental dams and clamps, retraction materials, and other isolation methods, Sealants (SE), and Restorative Functions (RF) – covering cavity liners and bases, amalgam restorations, composite, glass ionomer and compomer restorations, and stainless steel crowns. Additional information about the CRFDA certification program can be found in the attached CRFDA Overview, marked as Appendix B.

The availability of standardized examinations addressing knowledge of the functions that will be performed by those holding the appropriate permits in Nebraska will simplify the initiation and implementation of an assessment program for the assistants performing these functions, should the dental board and/or educators in Nebraska wish to implement such a program. The CRFDA certification program was launched in May 2013. There are rulemaking proposals pending in two states to begin using components of DANB's CRFDA certification for knowledge-based competency assessment of dental auxiliaries performing restorative functions, and a number of other states have contacted DANB for information about the CRFDA component exams as they consider expanding functions that may be delegated to dental assistants or as they seek new examination solutions for existing programs.

### **About the Reliability, Validity and Consistency of Independent Assessments**

DANB supports and encourages the use of independent, standardized examinations for dental assistant licensure and to qualify dental assistants who will be performing expanded functions, because independent assessments that are developed in accordance with psychometric best practices, such as those developed by DANB, tend to result in greater reliability and validity than exams administered by a course instructor at the end of a specific course of study. Reliability (whether the exam consistently assesses all candidates) and validity (whether the exam measures the required knowledge for performing the intended task) are two key underlying factors that should be considered when developing or selecting an exam to be used for high-stakes purposes, such as granting regulatory authorization to perform certain functions—especially those that may impact public safety. Objective and independently developed standardized tests meeting national psychometric standards are more likely to provide consistent and accurate results across multiple courses/instructors than end-of-course exams. In addition, requiring one uniform knowledge-based competency assessment developed by a qualified independent third-party testing organization will

- Provide assurance to regulators that all who have completed a defined course of study have understood the important concepts at the same required level
- Allow regulators to compare the quality of preparation provided by all state dental board-approved courses
- Help employer dentists to feel confident that dental assistants who hold a state expanded functions permit/registration/certificate have met one uniform standard of knowledge-based competency

### **DANB Expertise and Other DANB Services**

DANB has considerable experience working with state regulators to implement examination programs for dental assistants and is fully prepared to assist Nebraska stakeholders to do so. We are providing for the committee's reference an Overview of Services, marked as Appendix C, which summarizes many of the advantages of working with DANB, but we will also highlight some of the most significant benefits here:

- Recognizing or requiring existing DANB national exams eliminates exam development costs and allows for turnkey initiation of a state registration or competency measurement program for dental assistants
- DANB's exams are developed in accordance with nationally accepted psychometric standards, and its eligible certification programs are accredited by the NCCA, helping to ensure validity, reliability and legal defensibility
- DANB exams are available at more than 250 proctored, secure computerized testing sites nationwide (through Pearson VUE)
- DANB provides online credential verification for all DANB-administered credentials
- DANB reviews self-reported five-year criminal history and adverse regulatory actions for all DANB national exam candidates
- DANB can provide state dental boards, free of charge, with periodic reports of candidate performance on DANB exams
- DANB can provide additional administrative services for state regulators, when desired

### **Suggestion for Revision to Proposed Regulatory Language**

The proposal specifies that applicants for licensure to practice dental assisting will be required to pass the "Dental Assistant Certification Examination" administered by the Dental Assisting National Board, Inc. (DANB). Because DANB administers a number of certification exams for dental assistants, DANB recommends that this language be revised as follows:

*(a) An applicant desiring to secure licensure as a dental assistant shall have:*

- 1. Satisfactorily completed and graduated from an educational program for dental assistants approved by the Board and accredited by the Commission on Dental Accreditation and shall have taken the ~~Dental Assistant Certification Examination~~ Certified Dental Assistant certification examination administered by the Dental Assisting National Board (DANB) and currently be certified prior to the date of application or Board approved equivalent exam; or*
- 2. Successfully completed high school (or its equivalent) and shall have and obtained at least 1,500 hours of chairside work experience as a dental assistant during the five-year period prior to making application for licensure, passed the ~~Dental Assistant Certification Examination~~ Certified Dental Assistant certification examination administered by DANB and currently be certified prior to the date of the application or Board approved equivalent exam*

### **Information About National Trends Related to Restorative/Expanded Functions**

As part of our mission, DANB collects and compiles information about dental assisting laws and regulations nationwide and takes note of trends in oral healthcare, so that we may be ready to

assist the stakeholders who rely on our services to measure the competency of allied dental personnel. For several years, DANB has been following a trend that has seen more and more states authorize dental assistants to perform advanced intraoral functions under the supervision of a licensed dentist. Pennsylvania, one of the earliest states to initiate an EFDA program, passed its EFDA law in 1994. The years from 1994 to 2009 saw a steady increase in the number of states implementing a restorative functions program for dental assistants. Since 2010, at least five states have enacted laws and/or regulations authorizing dental assistants with approved education and training to place restorative materials and finish restorations. Nebraska joins at least three other states we are aware of that are actively considering such proposals at the present time. As such, DANB believes that consideration of the NDA/NDAA is timely and in line with the nationwide trend toward expanding the role of existing dental team members, including dental assistants, to help address deficiencies in access to oral health care for the underserved.

**For Additional Information**

If the committee would like any additional information about DANB exams or services or if there are any questions about the information provided, please do not hesitate to contact me:

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Thank you for allowing DANB to provide this information in connection with the current review process.

Best regards,



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Cc: Cindy Durley, M.Ed., MBA, DANB Executive Director  
Johnna Gueorguieva, Ph.D., DANB Senior Director, Credentialing and Client Services

Attachments