



Notice of Public Meeting of the Dental Assisting Forum

Friday, April 8, 2011

2005 Evergreen Street, First Floor Hearing Room
Sacramento, CA 95815
(916) 263-2300

- 10:00 am** Roll Call to Establish Quorum
- AGENDA ITEM 1** Approval of the April 7, 2010 and January 21, 2011 Dental Assisting Forum Meeting Minutes
- AGENDA ITEM 2** Discussion and Possible Action Regarding Recommendations for Changes to the Outline for the Registered Dental Assistant Written Examination.
- AGENDA ITEM 3** Discussion and Possible Action to Make Recommendations Regarding Establishing a Portfolio Pathway to Licensure for Registered Dental Assistants.
- AGENDA ITEM 4** Informational Update on the Subcommittee's Progress on the Comparison of Educational Courses Requirements of Title 16, California Code of Regulations, Section 1014.1 (Requirements for Radiation Safety Courses); Section 1070.3 (Approval of Pit and Fissure Sealant Courses); Section 1070.4 (Approval of Coronal Polishing Courses); and Section 1070.5 (Approval of Ultrasonic Scaling Courses) Relative to the Implementation of AB 2637.
- AGENDA ITEM 5** Discussion and Possible Action to Propose Legislation to Require All Registered Dental Assistants to Possess Certification in Pit and Fissure Sealants.
- AGENDA ITEM 6** Discussion and Possible Action to Make Recommendations Regarding Splitting the Registered Dental Assistant in Extended Functions Examination into Two Parts.
- AGENDA ITEM 7** Discussion and Possible Action to Make Recommendations Regarding New Allowable Duties for Dental Assistants, Registered Dental Assistants, Registered Dental Assistants in Extended Functions, Orthodontic Assistants and Dental Sedation Assistants.

PUBLIC COMMENT

*Note: the committee may not discuss or take action on any matter raised during the Public Comment section that is not included on this agenda, except to decide to place the matter on the agenda of a future meeting. Government Code Sections 11125 and 11125.7(a)

ADJOURNMENT

Public comments will be taken on agenda items at the time the specific item is raised. The Committee may take action on any item listed on the agenda, unless listed as informational only. All times are approximate and subject to change. Agenda items may be taken out of order to accommodate speakers and to maintain a quorum. The meeting may be cancelled without notice. Time limitations for discussion and comment will be determined by the Committee Chair. For verification of the meeting, call (916) 263-2300 or access the Board's Web Site at www.dbc.ca.gov. This Committee meeting is open to the public and is accessible to the physically disabled. A person who needs a disability-related accommodation or modification in order to participate in the meeting may make a request by contacting Dawn Dill, Manager at 2005 Evergreen Street, Suite 1550, Sacramento, CA 95815, or by phone at (916) 263-2300. Providing your request at least five business days before the meeting will help to ensure availability of the requested accommodation.



DENTAL ASSISTING FORUM MEETING

April 7, 2010
Dental Board of California
2005 Evergreen Street, Lake Tahoe Room
Sacramento, California

DRAFT MINUTES

Meeting was called to Order and a quorum was established.

Members Present

Pam Baldwin
Barbara Blade
Brenda Gyllenswan
Suzy Jordan
Lois Parento

Also Present

Judith Forsythe, Board Member, Dental Assisting Chair
Dr. Bruce Whitcher, Board Member, Dental Assisting Vice-Chair
Richard DeCuir, Executive Officer
Kristy Schieldge, Legal Counsel
Donna Kantner, Licensing and Examination Unit Manager
Dawn Dill, Dental Assisting Program Manager

Agenda Item 1 – Approval of the Dental Assisting Forum Meeting Minutes of February 10, 2010.

Ms. Schieldge suggested that staff add her to the list. Also include the title of each agenda item on the minutes. Ms. Baldwin motioned to accept the minutes with Ms. Schieldge's suggested changes. Ms. Gyllenswan seconded and the motion carried.

Agenda Item 2 – Discussion of Parameters of the Dental Assisting Forum's Role in Implementing Senate Bill 853.

Ms. Blade reviewed the legislative language and asked for input from the Forum members and the audience. The following is the list of the suggested parameters of the Dental Assisting Forum:

1. Public outreach to reach all dental assistants, licensed or unlicensed.
2. A single member of the forum to act as a liaison for the RDA Practical and RDAEF Examinations, Site Evaluations, Enforcement and Licensing committees.
3. Evaluating and Updating regulations for dental assisting related to all aspects of dental assisting.
4. Review and suggest changes or updates for dental assistant licensure and renewal.
5. Review and suggest changes or updates for allowable duties, settings and supervision.
6. Review and suggest changes or updates for appropriate standards of conduct and enforcement for dental assistants.

Agenda Item 3 – Review and Discussion of the Title 16, California Code of Regulations, Section 1070.3 – Approval of Pit and Fissure Sealants Courses; Section 1070.4 – Approval of Coronal Polishing Courses; Section 1070.5 – Approval of Ultrasonic Scaling Courses relative to the implementation of AB 2637.

Ms. Blade appointed a two member committee to perform a preliminary review of the existing regulations and identify discrepancies between the existing regulations and the new educational requirements affecting the RDA, RDAEF, Infection Control courses and programs. CADAT, the Alliance and CDA will be asked for input. Ms. Kline from CADAT requested that the Board contact all interested parties and provide a time frame for a response. Ms. Schieldge suggested that a request for response be posted on the Boards web site.

Agenda Item 4 – Review of the Registered Dental Assistant Law and Ethics and the Registered Dental Assistant Written Examination Outlines

Discussion centered on how the examinations were developed. A request was made to Mr. DeCuir to have representative present at a future meeting to go over the process used to develop these examinations.

Agenda Item 5 – Discussion of the need for Regulatory Language for the Teaching Methodology Courses in Clinical Evaluation for Registered Dental Assistants in Extended Functions Faculty Members as specified in Business and Professions Code, Section 1758(c)

Ms. Kantner reported that this item had previously been addressed by the Board and was included in the new regulatory language the board had adopted at a prior meeting.

Dental Board of California

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DENTAL ASSISTING FORUM MEETING

January 21, 2011
Dental Board of California
2005 Evergreen Street, Hearing Room
Sacramento, California

DRAFT MINUTES

Meeting was called to Order at 10:06 and a quorum was established.

Members Present

Pam Baldwin
Brenda Gyllenswan
Suzy Jordan
Lois Parento

Members Absent

Barbara Blade

Also Present

Judith Forsythe, Board Member, Dental Assisting Chair
Dr. Bruce Witcher, Board Member, Dental Assisting Vice-Chair
Richard DeCuir, Executive Officer
Denise Johnson, Assistant Executive Officer
Kristy Shellans, Legal Counsel
Dawn Dill, Manager, Dental Assisting Program
Tanya Webber, AGPA
Georgetta Griffith, Special Consultant

Agenda Item 1 – Approval of the Dental Assisting Forum Meeting Minutes of April 7, 2010

Mr. DeCuir recommended that the minutes be tabled due to the minutes not being received prior to the meeting today. Ms. Shellans asked for clarification regarding missing information in regards to Agenda Item 2.

M/S/C (Baldwin/Parento) moved to table the minutes to the next meeting.

Agenda Item 2 – Discussion of the Registered Dental Assistant Written Examination Development Process – Presentation by Consultant Tracy Montez, PhD.

Dr. Montez gave an overview of the process that is utilized to develop licensure examinations. Subject Matter Experts (SME) who are all licensees in good standing and actively practicing were contacted and asked to attend workshops or focus groups to assist in developing the new examination.

There were several focus group meetings; the prior examination outline was reviewed, as well as, the prior analysis that was done. The focus group then went over the changes in the statutory language; based on this information the focus group determined what type of competencies to include in the examination outline and what competencies to remove because they were no longer relevant. Workshops were then scheduled to develop questions based on the identified critical competencies for licensure.

The new examination outline and questions were developed based on the statutory requirements and followed the national standards for licensure examination test development. This very standardized process for developing licensure examinations always involved testing experts and SME's. Board staff is also involved because staff knows the policies. These processes make the examination defensible.

Dr. Montez stressed the importance of continuing to develop the exam to ensure the examination will test competency. It is also important to accept feedback from stakeholders and schools, the information be fed into the exam development process and the necessity of always reevaluating what you are testing.

Ms. Gyllenswan asked why educators are eliminated from the process. Dr. Montez responded that it depends on the philosophy of the testing expert. Educators traditionally have a mindset of teaching to the universe of practice, with licensing exams you want to test critical competencies. Educators were in some of the workgroups, but were not included in workgroups that set the passing score to protect themselves and the Board.

Ms. Baldwin asked how the recruitment of SME's was done. Dr. Montez responded that Board staff was provided with the criteria for a SME and contacted the SME's.

Many questions were asked relating to the percentage of questions on the examination plan that are rudimentary or require certification to qualify for licensure, including Infection Control, Coronal Polish, and Sealants. Dr. Montez responded that the dozens of SME's felt it was very important to have the quantity of questions and that they should be weighted heavier with those types of questions. As a licensing board, the Dental Board must be conservative in it's measurement of competency. In time these percentages may change.

Joan Greenfield, Dental Assisting Alliance Stated the Alliance has gone on record that they don't feel the RDA written is defensible. The Alliance believes the testing expert allowed the SME's to derail the RDA written and the exam is not reflective of current

RDA duties. Hopes that DAF will have input to the Board on what she feels the structure of the exam should have.

Lori Gagliardi, CADAT asked if we knew the pass rate for candidates based on the individual qualification method. Stated that CADAT is happy with the wide variety of questions.

M/S/C (Baldwin/Jordan) recommend to the Board upon review of the examination, would like the Board to consider changes to the following areas in the content outline to include Infection Control, Dental Radiation Safety and Preventative procedures.

Agenda Item 3 – Discussion of the Registered Dental Assistant Law and Ethics Examination Development Process

Nancy Linn from the Department of Consumer Affairs, Office of Professional Examination Services, gave an overview of the contract utilized to develop the new exam. Ms. Linn explained the process that was used to develop the examination outline and cited the differences between the process and references she was able to use versus those that had to be used for other exams.

Ms. Linn stated it is very important in licensure and selection of Subject Matter Experts (SME) to utilize relatively newly licensed SME's because we are trying to gear all of our information and focus to the entry level/minimally competent.

Ms. Linn explained how a cut score is determined for each version of an exam.

Ms. Baldwin asked what the pass/fail rate is this examination. Ms. Linn stated 71%. Ms. Baldwin asked why the ethics references did not include the CDAA or ADAA. Ms. Linn responded that all reference that were available to the public. It was the decision of the SME's on which reference materials to use.

Dr. Whitcher asked what was planned for developing further questions for the item bank. Ms. Linn explained that we have a new contract as a result of the examination breach that occurred. The contract was originally scheduled to start in August 2010. Ms. Linn explained that additional questions cannot be developed without a contract.

Ms. Baldwin questioned "veracity" portion of the outline. She believes this category is geared toward front office duties. Ms. Linn responded that these questions were developed and validated by the SME's and were written from the Dental Assistant perspective.

Joan Greenfield, Dental Assisting Alliance. Asked how an exam plan is select. Ms. Linn responded that in most cases you would use the tasks and knowledge needed to perform the task. Ms. Greenfield talked about the gap between what was taught in the OA course and what was on the licensing examination. Ms. Linn commented that what is on a licensure exam is concerned with protecting the public.

Agenda Item 4 – Discussion of Methods to Communicate New Employment Requirements for Dental Assistants as outlined in Business & Professions Code, Section 1750

Dr. Whitcher suggested that this information be included in a future newsletter.

Ms. Parento asked since it has been a year, have we seen that there is compliance with this requirement. Ms. Dill stated that it is the employer's responsibility and is not monitored by the Board except during inspections of dental offices.

Ms. Shellans suggested a notice be prominently posted on the home page of the Board's web site.

Ms. Shellans also suggested an email blast be sent.

Lori Gagliardi, CADAT stated there is no accountability to the employer dentists. She suggests a letter be sent to all dental offices requiring the dentist to report their employees have met the requirement or are currently licensed.

Gail Mathe, CDA stated it is CDA's commitment to continue to put the information out and educate their members.

Joan Greenfield, Dental Assisting Alliance stated she is aware that the new requirements for the RDAEF, DSA, OA license or permits are not widely known within the dental community. She suggested that the web site be updated with this information.

Agenda Item 5 – Discussion of Potential New Allowable Dental Assistant Duties

There was discussion of what additional duties the Board may want to consider adding to the allowable duties for each license type. It was suggested to possibly add to the Dental Sedation Assistant duties "Place sedative socket dressing" and to the Registered Dental Assistant in Extended Functions duties "administration of local anesthesia".

This item will be carried over to the next meeting for additional discussion.

Agenda Item 6 – Future Meeting Dates – 2011

The following dates were selected for future meetings. April 8, 2011, June 17, 2011 and September 30, 2011.

There was no public comment.

The meeting adjourned at 12:45.



MEMORANDUM

DATE	March 22, 2011
TO	Dental Assisting Forum Members
FROM	Dawn Dill, Manager Dental Assisting Program
SUBJECT	Agenda Item 2 – Discussion and Possible Action Regarding Recommendations for Changes to the Outline for the Registered Dental Assistant Written Examination.

Background

The Dental Assisting Forum (DAF) met on January 21, 2011 in Sacramento, CA. The DAF discussed the Registered Dental Assistant (RDA) written examination and concerns regarding the examination outline. Specifically, concerns have been raised in the dental assisting community pertaining to the percentage of exam questions that are rudimentary or require certification to qualify for licensure within the areas of Infection Control, Coronal Polish, and Pit and Fissure Sealants.

During the meeting, the DAF voted to recommend that the Board consider changes to the examination outline to include Infection Control, Dental Radiation Safety, and preventative procedures after the current examination review is complete.

At the February Board meeting, the Dental Assisting Committee (DAC) accepted the DAF's recommendation to consider changes to the examination outline to include infection control, dental radiation safety and preventative procedures and to have staff incorporate this recommendation into the annual review of the examination.

It is clearly defined in the opening paragraph the concerns of the DAF were accurately conveyed to the Board.

Action

No further action is required.



MEMORANDUM

DATE	March 22, 2011
TO	Dental Assisting Forum Members
FROM	Dawn Dill, Manager Dental Assisting Program
SUBJECT	Agenda Item 3 – Discussion and Possible Action to Make Recommendations Regarding Establishing a Portfolio Pathway to Licensure for Registered Dental Assistants.

Background:

At the February 24 and 25, 2011 meeting of the Dental Board, Dr. Casagrande asked that alternative pathways to RDA licensure be put on the next Board agenda. To assist the Board in gathering information this item has been placed on this agenda.

Legislation was passed last year which allows for licensure upon graduation from a board-approved dental school. The Business and Professions (B&P) codes define specific requirements that must be met in order for a graduate to receive a license with having to take a recognized examination other than law and ethics. The B&P also specifies specific areas of competence which must be met.

To assist in beginning the discussion, provided below are the Business and Professions Codes pertaining to Portfolio licensure for dental students:

1630. The examination of applicants for a license to practice dentistry in this state, as described in Section 1632, shall be sufficiently thorough to test the fitness of the applicant to practice dentistry, and both questions and answers shall be written in the English language.

1632. (a) The board shall require each applicant to successfully complete the Part I and Part II written examinations of the National Board Dental Examination of the Joint Commission on National Dental Examinations.

(b) The board shall require each applicant to successfully complete an examination in California law and ethics developed and administered by the board. The board shall provide a separate application for this examination. Applicants shall submit this application and required fee to the board in order to take this examination. In addition to the aforementioned application, the only other requirement for taking this examination shall be certification from the dean of the qualifying dental school attended by the applicant that the applicant has graduated, or will graduate, or is expected to graduate. Applicants who submit completed applications and certification from the dean at least 15 days prior to a scheduled examination shall be scheduled to take the examination. Successful results of the examination shall, as established by board regulation, remain valid for two years from the date that the applicant is notified of having passed the examination.

(c) Except as otherwise provided in Section 1632.5, the board shall require each applicant to have taken and received a passing score on one of the following:

(1) A portfolio examination of the applicant's competence to enter the practice of dentistry. This examination shall be conducted while the applicant is enrolled in a dental school program at a board-approved school located in California. This examination shall utilize uniform standards of clinical experiences and competencies, as approved by the board pursuant to Section 1632.1. The applicant shall pass a final assessment of the submitted portfolio at the end of his or her dental school program. Before any portfolio assessment may be submitted to the board, the applicant shall remit to the board a three hundred fifty dollar (\$350) fee, to be deposited into the State Dentistry Fund, and a letter of good standing signed by the dean of his or her dental school or his or her delegate stating that the applicant has graduated or will graduate with no pending ethical issues.

(A) The portfolio examination shall not be conducted until the board adopts regulations to carry out this paragraph. The board shall post notice on its Internet Web site when these regulations have been adopted.

(B) The board shall also provide written notice to the Legislature and the Legislative Counsel when these regulations have been adopted.

(2) A clinical and written examination administered by the Western Regional Examining Board, which board shall determine the passing score for that examination.

(d) Notwithstanding subdivision (b) of Section 1628, the board is authorized to do either of the following:

(1) Approve an application for examination from, and to examine an applicant who is enrolled in, but has not yet graduated from, a reputable dental school approved by the board.

(2) Accept the results of an examination described in paragraph (2) of subdivision (c) submitted by an applicant who was enrolled in, but had not graduated from, a reputable dental school approved by the board at the time the examination was administered.

In either case, the board shall require the dean of that school or his or her delegate to furnish satisfactory proof that the applicant will graduate within one year of the date the examination was administered or as provided in paragraph (1) of subdivision (c).

1632.1. (a) With regard to the portfolio examination specified in paragraph (1) of subdivision (c) of Section 1632, the board shall independently monitor and audit the standardization and calibration of dental school competency instructors at least biennially to ensure standardization and an acceptable level of calibration in the grading of the examination. Each dental school's competency examinations shall be audited biennially by the board.

(b) The board shall oversee all aspects of the portfolio examination process specified in paragraph (1) of subdivision (c) of Section 1632 and under this section, but shall not interfere with the dental school authority to establish and deliver an accredited curriculum. The board shall determine an end-of-year deadline, in consultation with the current board-approved dental schools, to determine when the portfolio examinations shall be completed and submitted to the board for review by the board's examiners.

(c) The board, in consultation with the current board-approved dental schools, shall approve portfolio examination competencies and the minimum number of clinical experiences required for successful completion of the portfolio examination.

(d) The board shall require and verify successful completion of competency examinations that were performed on a patient of record of a board-approved dental school, including, but not limited to, the following:

(1) Comprehensive oral diagnosis and treatment planning.

(2) Periodontics.

(3) Direct restorations.

(4) Indirect restorations.

(5) Removable prosthodontics.

(6) Endodontics.

Action:

Discuss and begin to formulate the suggested requirements for RDA licensure via portfolio pathway.



MEMORANDUM

DATE	March 22, 2011
TO	Dental Assisting Forum Members
FROM	Dawn Dill, Manager Dental Assisting Program
SUBJECT	Agenda Item 4 – Informational Update on the Subcommittee’s Progress on the Comparison of Educational Courses Requirements of Title 16, California Code of Regulations Section 1014.1 (Requirements for Radiation Safety Courses); Section 1070.3 (Approval of Pit and Fissure Sealant Courses); Section 1070.4 (Approval of Coronal Polishing Courses); and 1070.5 (Approval of Ultrasonic Scaling Courses) Relative to the Implementation of AB 2637

Background

At the April 2010 meeting of the Dental Assisting Forum (DAF), Chairperson Blade appointed a two person subcommittee to compare the existing regulations relating to Educational Course Requirements with the proposed regulatory language and to identify discrepancies between the two affecting the Registered Dental Assistant Programs, the Registered Dental Assistant in Extended Functions Programs, Infection Control Courses, Orthodontic Assistant Permit Courses and Dental Sedation Assistant Permit Courses. It was also decided to ask Stakeholders (CADAT, the Alliance and CDA) for input.

Since the statutes for the educational requirements were repealed effective January 1, 2011 this item has been placed on hold until the pending Dental Assisting Educational Programs and Courses Regulatory Package is approved by the Office of Administrative Law. At the February 25, 2011 meeting of the Dental Board, the Board adopted the third modified text and directed staff to take all steps necessary to complete the rulemaking process, including the filing of the final rulemaking package with the Office of Administrative Law. Staff is currently working on the final rulemaking package.

Action

This is an informational item. No action is necessary.



MEMORANDUM

DATE	March 22, 2011
TO	Dental Assisting Forum Members
FROM	Dawn Dill, Manager Dental Assisting Program
SUBJECT	Agenda Item 5 – Discussion and Possible Action to Propose Legislation to Require All Registered Dental Assistant to Possess Certification in Pit and Fissure Sealants.

Background

Assembly Bill (AB) 2637 created Business and Professions Code (B&P) 1752.6 which requires anyone licensed as a Registered Dental Assistant (RDA) on or after January 1, 2010, to provide evidence of successful completion of a board-approved course in the application of pit and fissure sealants prior to the first expiration of the license that requires the completion of continuing education as a condition of renewal. The license of a registered dental assistant who does not provide evidence of success completion of that course shall not be renewed until evidence of course completion is provided.

In 2001 Senate Bill (SB) 134 created a similar B&P 1645.1 which required any person who holds an RDA license to submit evidence of having successfully completed board-approved courses in radiation safety and coronal polishing by January 1, 2006. Anyone failing to comply with this section was automatically suspended until evidence was provided.

Although these two codes are very similar, there is a difference in not requiring all RDA's to complete a pit and fissure sealants course, as is the case with coronal polishing and radiation safety.

Action:

Discuss and formulate the need for proposed language for consideration by the Board.



MEMORANDUM

DATE	March 22, 2011
TO	Dental Assisting Forum Members
FROM	Dawn Dill, Manager Dental Assisting Program
SUBJECT	Agenda Item 6 – Discussion and Possible Action to Make Recommendations Regarding Splitting the Registered Dental Assistant in Extended Functions Examination into Two Parts.

Background

If a Registered Dental Assistant (RDA) takes the approved education and the examination they may perform all duties authorized by Business and Professions Code, Section 1753.5. If an RDAEF licensed before December 31, 2009 takes additional training and passes the required portion of the exam, they will be authorized to perform all of the RDAEF duties.

The Registered Dental Assistant in Extended Functions (RDAEF) examination consists of four procedures.

Business and Professions (B&P) Code Section 1753.4 (a) requires:

Successful completion of the following two procedures on a patient provided by the applicant. The prepared tooth, prior to preparation, shall have had mesial and distal contact. The preparation performed shall have margins at or below the free gingival crest and shall be one of the following: 7/8 crown, 3/4 crown, or full crown, including porcelain fused to metal. Alginate impression materials alone shall not be acceptable:

- (1) Cord retraction of gingiva for impression procedures.
- (2) Take a final impression for a permanent indirect restoration.

B & P, Section 1753.4 (b) requires:

Successful completion of two of the following procedures on a simulated patient head mounted in appropriate position and accommodating an articulated typodont in an enclosed intraoral environment, or mounted on a dental chair in a dental operatory:

- (1) Place, condense, and carve an amalgam restoration.
- (2) Place and contour a nonmetallic direct restoration.
- (3) Polish and contour an existing amalgam restoration.

With the current composition of the exam, if an RDA candidate fails any of the four procedures, they must retake both portions of the examination.

Action:

Discuss and formulate a recommendation regarding the need for splitting the examination in two parts.



MEMORANDUM

DATE	March 24, 2011
TO	Dental Assisting Forum Members
FROM	Dawn Dill, Manager Dental Assisting Program
SUBJECT	Agenda Item 7 – Discussion and Possible Action to Make Recommendations Regarding New Allowable Duties for Dental Assistants, Registered Dental Assistants, Registered Dental Assistants in Extended Functions, Orthodontic Assistants and Dental Sedation Assistants.

Background

The duties that may be performed by assistants are currently set in Statute. Business and Professions (B&P) Code, Sections 1750.1 Dental Assistant Duties, 1750.3 Orthodontic Assistant Duties, 1750.5 Dental Sedation Assistant Duties, 1752.4 Registered Dental Assistant Duties and 1753.5 Registered Dental Assistant in Extended Functions Duties. Each of these statutes allows the board to specify additional allowable duties by regulations.

Based on the current "Standard of Care" and dental materials being used in dentistry, are there additional duties that the board should consider adding to any of the assisting allowable duties?

This item was on the January 21, 2011 agenda. At the request of the members the item has been carried over to this meeting. Below is an excerpt from the meeting minutes:

There was discussion of what additional duties the Board may want to consider adding to the allowable duties for each license type. It was suggested to possibly add to the Dental Sedation Assistant duties "Place sedative socket dressing" and to the Registered Dental Assistant in Extended Functions duties "Administration of local anesthesia".

Action

Discuss and formulate a recommendation for Board consideration, including the need for additional duties.