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INDUSTRIAL REGULATORY
REVIEW COMMISSION

August 7, 1998

Judith Pachter Schulder, Esq.
Counsel, State Board of Dentistry
116 Pine Street
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: No. 16A-465 (Expanded Function Dental Assistant)

Dear Ms. Schulder:

The Pennsylvania Dental Hygienists' Association (hereinafter the "PDHA") has reviewed the above-proposed regulations, which were published July 11, 1998. Following are the PDHA's official comments to these proposed regulations. I thank you in advance for your consideration of these matters.

I. Licensure and Certification by Criteria Approval (§33.107)

While the PDHA supports criteria approval for out-of-state practitioners, such criteria should be explicitly set forth in the regulations.

II. First Certification Examination (§33.144)

Subsection (c) provides that Temporary Permit Holders who fail the first examination shall immediately cease practicing and return their temporary permits. This

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Subsection should also address the ability of a Temporary Permit Holder who fails the first examination to retake the examination at its next offering.

The PDHA recommends that a Temporary Permit Holder who fails the first examination be given two other opportunities to take and pass the examination.

Subsection (d) has an incorrect reference to "(d)." The correct reference should be "(e)."

III. Practice as an Expanded Function Dental Assistant (§33.205a)

The PDHA objects to the definition of expanded function dental assistant services as including placing and finishing composite resin restorations. (See Subsection (a)(1)(vii).)

The PDHA recommends changing this subsection to include "placing and finishing composite resin restoration and/or sealant material as a restorative procedure." This would bring the regulations in compliance with the Dental Duties Chart that was approved and adopted by the Board at its July 1998 meeting.

Respectfully submitted,



Anita Lantzy, RDH
President, Pennsylvania Dental
Hygienists' Association