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VALLEY ORAL & MAXILLOFACIAL SURGERY P.C.

DRS. GIALLORENZI, KOTCHICK & GIALLORENZI
Practice Limited to Oral and Maxillofacial Surgery

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Arthur Coccodrilli, Chairperson
Independent Regulatory Review Board
333 Market Street 14th Floor
Harrisburg, PA 17101

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October 22, 2009

SUBJECT: DENTAL HYGIENE SCOPE OF PRACTICE FINAL-FORM REGULATION, IRRC #2720

Dear Mr. Coccodrilli:

I am writing to voice my opposition to the Dental Hygiene Scope of Practice Final-Form Regulation IRRC #2720.

My particular complaint involves the centralization of dental hygienists to administer drugs by injection i.e. local anesthesia. This is NOT a benign procedure. It requires extensive clinical and didactic training to deliver safely. The amount of training in the regulation, especially for individuals that have only a high school education plus a hygiene course, is totally inadequate. The heart of this question is patient safety and nothing else. All special interest agendas do not supersede patient welfare and protection.

I have been a board certified Oral and Maxillofacial surgeon for over thirty-five years. I was an American Board of Oral and Maxillofacial Surgery Examiner for six years. I have seen many untoward results and reactions from local anesthesia. They can be life threatening in the extreme.



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I ask you to reconsider this portion of the regulations for patients safety and ONLY patient welfare. I feel this portion of the regulation should be removed.

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Yours sincerely,

Albert F. Giallorenzi, D.M.D., F.I.C.D., F.A.C.D.

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FAX COVER SHEET

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Date: 10/22/09

Pages: 3

TO: Arthur Coccorilli

FROM: Dr. Albert Giallorenzi