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2009 OCT 22 PM 3:44

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

October 22, 2009

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

Dear Mr. Coccodrilli:

I have served on the Pennsylvania State Dental Board for thirteen years and was chairperson for ten consecutive years.

My comments are directed at the Dental Hygiene Scope of Practice Final-Form regulation IRRC #2720.

It is my opinion that the State Board of Dentistry does not have the authority to grant the dental hygienist the privilege to administer local anesthesia, both infiltration and block. I will leave this matter to the legal profession since I am not a lawyer.

More importantly, the dental hygienist does not have the necessary education to administer local infiltration and local block anesthesia. They do not have a sufficient educational background in a two year technical education where at least one of the two years is devoted to cleaning teeth.

The hygienist does not have an adequate background in Pharmacology, which would have them understand the make-up and use of drugs.

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They do not have adequate training in Physiology which would teach them how the drugs interact on the entire body.

They do not have an adequate amount of training in Anatomy which would teach them where to inject the drug and what they must avoid. Catastrophic events may occur if the drug is injected in the wrong place.

They do not have adequate courses in Medicine, which would teach them who should and who should not receive which type of anesthesia.

They do not have adequate course knowledge in Microbiology which would teach them the techniques of safe bacterial and viral contamination.

As you can readily see, local anesthesia requires an extensive amount of academic background in the basic sciences. This is impossible to obtain in their basic training. It is equally absurd to think that thirty hours of "anesthesia training" is adequate.

I would not allow a dental hygienist to inject me or my family and they should not be allowed to inject dental patients. This is a protection of the public issue.

It is not just sticking someone with a needle; anyone can be shown how to do that. It is the extensive medical background information and training that is needed and necessary.

I urge the IRRC not to allow this to pass and to protect the citizens of the Commonwealth. They deserve better.

This regulation has no effect on the access to care issue.

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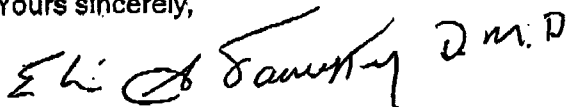
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Health care is becoming more complicated, not less complicated, and I simply find it incredulous that individuals who may have two years of training post high school would be given the same responsibilities as graduate dentists.

I know that dental hygienists do not have enough wisdom or knowledge to even contemplate administering local anesthesia agents.

Please inform me if I can be of any assistance in this matter.

Yours sincerely,



Eli Stavisky, D.M.D., F.I.C.D., F.A.C.D.

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FAX COVER SHEET

(Material contained in this fax is CONFIDENTIAL and is to be reviewed only by those persons to which it is addressed.)

Date: 10/22/09

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TO: Arthur Cocconilli

FROM: Eli Stavisky