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SEP 15 REC'D

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

#2720

I am writing in support of the State Board of Dentistry (Board) proposed amendment §§ 33.1, 33.3, 33.102, 33.205, 33.301, 33.302 and 33.402 and add §§ 33.115, 33.116 and 33.205b (relating to local anesthesia permit; certification of public health dental hygiene practitioners; and practice as a public health dental hygiene practitioner) to read as set forth in Annex A.

I feel these changes in the DH regulations will facilitate better care for the residents of Pennsylvania.

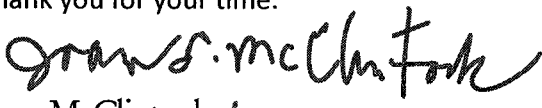
The following recommendations all have my support.

1. Administration of local anesthesia by Registered Dental Hygienists with 30 hr. course
2. Creation of a Public Health Dental Hygiene Practitioner requires certification
3. Change in Supervision: dentist & RDH decide supervision needed (removes ASA Classifications)
4. Change from direct to general supervision for radiographs
5. Allows for three hours of continuing ed. in communication skills for RDHs.

I recommend the revised wording for supervision of RDH in private practice to: "level of supervision will be determined by the dentist and the RDH after review of the patients' medical and dental history"

I also recommend the inclusion of free health clinics like Community Volunteers in Medicine along with Federally Qualified Health Center LOOK-A-LIKES and non-profit clinics as sites for Public Health Dental Hygiene Practitioners to practice.

Thank you for your time.

  
Joan McClintock RDH