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**From:** Donna Kipila [donnakipila@gmail.com]  
**Sent:** Tuesday, September 16, 2008 4:44 PM  
**To:** IRRRC  
**Subject:** new RDH regulation concerns

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear IRRRC,

My concerns lie with the Public Health Dental Hygiene Practitioner specifications. The idea that a dental hygienist with minimal education of & lack of school certification can go into public school, practice preventive procedures, and teach in a classroom setting under state guidelines is a problem.

The PA Department of Education & PA Department of Health/School Health Division, require dental hygienists, who want to work in the public school setting, to have a bachelor degree & school certification. This is clearly omitted from the proposal. What it is saying is a dental hygienist with an Associate degree & 2 year of experience can do the job of a certified school dental hygienist in Pennsylvania. Curriculum writing & teaching are a valuable resource we provide that others of less education cannot.

School districts recognize education levels & certifications; otherwise you become classified as a Health Room Aid with minimal compensation per hour. Access payments belong to the school district, which end up in the special education budget. As Certified Education Specialist, school hygienists receive the same benefits as a Pennsylvania certified teacher, as well as all the responsibilities that encompass.

Also, I believe that in this Bill, Act 48 hours would count for dental hygiene continuing education credits. How can this happen if you are not classified as a "teaching specialist" without the bachelor degree & certification?

In conclusion, the certified school dental hygienist's voice was

not included in the writing of this proposal. It seemed to be written in a rush & the school dental hygienists' were thrown in as an after thought. The word "schools" in the proposal language is written too vaguely. It should have been written as head start or pre-school. I don't believe that PDHA understands the meaning of a certified school dental hygienist. We belong to PDHA & support them, but this is disturbing.

Sincerely,

Donna Kipila RDH, BS, M.ED.

Certified School Dental Hygienist with 21 years experience in the public school system