

**From:**  
**Sent:** Wed 9/17/2008 6:40 AM  
**To:** irrc@irrc.state.pa.us  
**Subject:**

2720

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2008 SEP 30 AM 8:55

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Dear IRRC,

My concerns also lie with the Public Health Dental Hygiene Practitioner specifications. The idea that a dental hygienist with minimal education & lack of school certification can go into public schools, 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 bachelors degree & school certification. This is clearly omitted from the proposal. What it is saying is a dental hygienist with an Associate degree & 2 years 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 Educational Specialists, school hygienists receive the same benefits as a Pennsylvania certified teacher, as well as all the responsibilities that encompasses.

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 very people who are trained for these positions, the certified school dental hygienists, were not consulted in the writing of this proposal. I realize that time is of the essence & we need to get access to population as soon as possible but we need to do it safely and this could present a larger problem. School districts are already retiring dental hygiene programs at an alarming rate. Budget cuts are becoming dental hygiene program cuts. We do not want to add to the list of reasons for not beginning a dental hygiene program or discontinuing one because of legal risks due to lack of education.

Sincerely, Debra M. Adams RDH AAS BSc  
Wyalusing Area District Hygienist