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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Dear Mr. Grovich, Esq.

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).

As a practicing Hygienist of 23 years, I feel these changes in the Dental Hygiene regulations will facilitate better care for all residents of the Commonwealth 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 would also recommend 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 would also recommend the inclusion of free health clinics along with non-profit dental centers that focus on basic dental care for underserved and underinsured as sites for Public Health Dental Hygiene Practitioners to practice.

Thank you for your time and allowing for comment on this issue

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Cc IRRRC