

September 21, 2008

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2008 SEP 30 AM 8:53

INDEPENDENT REGULATORY
REVIEW COMMISSION

Christopher Gruchy, counselor
STATE BOARD of Dentistry,
P.O. Box 2649
Harrisburg, PA.

DEAR MEMBERS of the State Board of Dentistry:

I am providing comments on the dental hygiene scope of practice regulations, 16A-4617. I have been practicing dental hygiene for over 30 years and have worked in many different types of practices. There is a great unmet dental need in Pennsylvania. I am pleased to see the creation of the public health dental hygiene practitioner and speak in favor of her/him.

The section on supervision states "the dentist" decides if the patient requires general or direct supervision. I would recommend adding "the dentist and the dental hygienist". Discussions between the dentist and dental hygienist regarding the health status of the patient creates a safer and more thorough environment.

I am very excited to read the section on "the administration of local anesthesia". This is a much needed service. I am happy that it took Pennsylvania over 30 years to permit this. There is a confusing section in the direct supervision of the dental hygienist administering the local anesthesia. Why does the dentist have to come in and examine the patient after the completed injection? Consider removing that requirement.

Thank you for the opportunity to comment on these proposed regulations.

Sincerely,

L. I.R.R.C.

Susan Giorgio
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