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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Christopher Grovich, Esquire  
State Board of Dentistry  
P. O. Box 2649  
Harrisburg, PA 17105-2649

Dear Mr. Grovich:

I am writing in regards to the recently published proposed regulations 16A-4617, Scope of Dental Hygiene Practice. As a practicing full-time dental hygienist for 30 years, I have worked in the private dental office, but also added public health sites the last several years after becoming more aware of the access to care concerns.

I am very pleased that the Board is finally reinstating the administration of local anesthesia. Not being able to provide this service throughout my career after having been educated to do so, I look forward to this opportunity. This will create more efficient use of time for those patients needing pain control for the scaling and root planning procedures provided by the dental hygienists in our office.

Regarding supervision in the private dental office, I would like to recommend consideration of inserting the words "and the dental hygienist" after "as determined by the dentist". This would allow both licensees to decide on the appropriate level of supervision based on the patient's medical and dental status.

As for the public health arena, I am very pleased about the creation of the public health dental hygiene practitioner. I have worked in the Head Start program and am now volunteering at a federally qualified health center treating low income pregnant women. The need for preventive services is so great that I would like to recommend adding free clinics and FQHC "look alike". The inclusion of these facilities will allow the PHDHP to treat more of the poor and needy by eliminating the hiring of a supervising dentist - a major cost. These sites exist on grants and donations, not state or federal funding.

I appreciate the opportunity to provide comment on these proposed regulations and commend the State Board of Dentistry in their efforts to develop regulations from Act 51, as well as amend the scope of practice to reflect a more current standard of preventive care for all Pennsylvanians.

Sincerely,

*Faye L. Capirano, AS, RDH*

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