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September 29, 2008

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Christopher P. Grovich
Counsel, Pennsylvania State Board of Dentistry
P. O. Box 2649
Harrisburg, Pennsylvania 17105-2649

2008 OCT -9 AM 9:12
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Grovich,

First and foremost, we would like to express our thanks to the State Board of Dentistry for soliciting our comment and opinion on the proposed changes to the "Dental Hygiene Scope of Practice; Local Anesthesia."

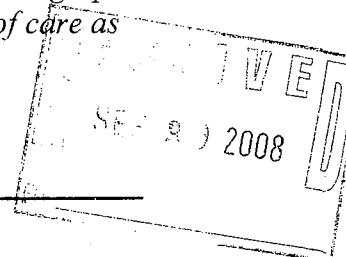
The Pennsylvania Academy of General Dentistry (PAGD) is supportive of these proposed changes, however, we would like to comment and express our concern with the following:

- **33.205.(d)(iii)** Public health dental hygiene practitioners providing professional services as identified in subsection (a)(2) to ASA Class III – ASA Class V patients under the direct supervision of a dentist.

PAGD is concerned with the medical risk factors and existing systemic diseases that may possibly exist with these patients. Their treatment by a public health dental hygiene practitioner may compromise any preexisting clinical and medical condition. We feel that this should be under the direct supervision of a dentist. We have no objections to having ASA I and ASA II patients receive treatment under no supervision within the same criteria as a dental hygienist as identified in section 33.1. Definitions, General Supervision.

- **33.302.(a)** Public health dental hygiene practitioners performing radiologic procedures in settings set forth in Section 33.205b(c) without the supervision of a dentist.

PAGD finds this alarming that the radiographic diagnosis is non-existent after radiologic exposure of a patient's dentition and its surrounding structures. This responsibility is left to the assessment of the public health dental hygiene practitioner who has not been granted the ability to diagnose. We believe that it should be included in the proposed changes that a dentist should review these films exposed in a timely manner (within 1 week), to determine absence or presence of any diagnosable conditions. Furthermore, at certain times, it is difficult to diagnose even with the aide of radiographs with certainty necessitating the need to perform a clinical examination. Therefore, there will be circumstances that will require the dentist to complete clinical and radiographic analysis to determine a proper diagnosis that is within the standard of care as established by the state dental board.

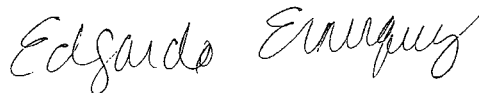


- **33.402.(c)** Continuing Education subject areas. A dental hygienist may complete 3 of the 20 hours of continuing education in course relating to communication skills.

PAGD strongly recommends specifically to the dental hygienist administering anesthesia to have the emphasis of at least 3 hours of continuing education in pharmacology or other related courses (instead of the courses relating to communication skills).

The Pennsylvania Academy of General Dentistry is strongly committed to working in with the Pennsylvania State Board of Dentistry and all other dental organizations in delivering the highest quality standard of dental care to the citizens of our state. We thank you for giving us the opportunity to share our convictions.

Respectfully,

A handwritten signature in cursive script that reads "Edgardo Enriquez".

Edgardo F. Enriquez, DDS, FAGD
President, Pennsylvania Academy of General Dentistry