



**2015-2017
BOARD OF DIRECTORS**

E. Todd Scheyer, DDS, MS
President
3400 S. Gessner Rd., #102
Houston, TX 77063
(713) 783-5442
etsperio@periohealth.com

Scott Dowell, DDS, MS
Secretary/Treasurer
4601 Buffalo Gap Rd., Suite A3
Abilene, TX 79606
(325) 437-3456
dowelldds@gmail.com

Steven Britain, DDS, MS
Secretary/Treasurer Elect
4900 Overton Ridge Blvd., #213
Fort Worth, TX 76132
(817) 423-0138
britainperio@sbcglobal.net

Ed Lorenzana, DDS, MS
Director
3519 Paesano's Parkway, #103
San Antonio, TX 78231
(210) 492-3519
drlorenzana@yahoo.com

Andrew Barnett, DDS, MS
Director
4030 N. Central Expressway, #588
Dallas, TX 75204
(831) 277-5163
Dr.Barnett.DentalGPS@gmail.com

Lisa Masters, DDS, MS
Past President
7400 Blanco, #100
San Antonio, TX 78216
(210) 349-4424
mastersdds@
mastersdentalgroup.com

Cindy Wainscott
Executive Director
1226 Nautical Lane
Richmond, TX 77469
(281) 414-6813
cwain@periohealth.com

May 25, 2016

Mr. Ken Levine
Director
Sunset Advisory Commission
P.O. Box 13066
Austin, TX 78711
Sunset@sunset.texas.gov

Re: Sunset Advisory Committee

Dear Mr. Levine:

The Texas Society of Periodontists (TSP) is sending this letter in review of the Sunset staff report for the Texas State Board of Dental Examiners (TSBDE). While the TSP supports the majority of the Committee's work, we are appreciative of this opportunity to provide feedback on certain recommendations within the Sunset Commission report. Given that the mission of the Sunset Commission is to improve governmental agencies and public safety, our commentary seeks not to promote an individual agenda, but to mirror the Commission's stated goals.

- *Recommendation 1.1 Reduce the size of the board from 15 to nine members and adjust its composition to consist of four dentists, two dental hygienists, and three public members.*

The TSP opposes this recommendation and feels that the representation of dentists on the board is critical and as a majority is most appropriate. Reducing the number of dentists on the board in half will significantly reduce representation for dentists in the State of Texas regarding dental issues. Furthermore, we feel strongly that the composition of the dental board members include at least two different ADA recognized specialties to provide expertise on issues beyond the scope of general dentistry. The TSP would offer as an option a smaller reduction in the board composition, yet one that maintains that the majority of voting members continue to be licensed Texas dentists and specialists.

- *Recommendation 2.1 Discontinue the board's dental assistant certificate program.*

The TSP feels the dental assistant certificate program provides oversight on a critical part of dentistry currently being conducted safely and effectively in the State of Texas because of such oversight. The TSP recommends that the TSBDE continue to maintain some form of oversight by the continued monitoring certification of dental assistants.



**2015-2017
BOARD OF DIRECTORS**

**E. Todd Scheyer, DDS, MS
President**

3400 S. Gessner Rd., #102
Houston, TX 77063
(713) 783-5442
etsperio@periohealth.com

**Scott Dowell, DDS, MS
Secretary/Treasurer**

4601 Buffalo Gap Rd., Suite A3
Abilene, TX 79606
(325) 437-3456
dowelldds@gmail.com

**Steven Britain, DDS, MS
Secretary/Treasurer Elect**

4900 Overton Ridge Blvd., #213
Fort Worth, TX 76132
(817) 423-0138
britainperio@sbcglobal.net

**Ed Lorenzana, DDS, MS
Director**

3519 Paesano's Parkway, #103
San Antonio, TX 78231
(210) 492-3519
dlorenzana@yahoo.com

**Andrew Barnett, DDS, MS
Director**

4030 N. Central Expressway, #588
Dallas, TX 75204
(831) 277-5163
Dr.Barnett.DentalGPS@gmail.com

**Lisa Masters, DDS, MS
Past President**

7400 Blanco, #100
San Antonio, TX 78216
(210) 349-4424
mastersdds@
mastersdentalgroup.com

Cindy Wainscott
Executive Director
1226 Nautical Lane
Richmond, TX 77469
(281) 414-6813
cwain@periohealth.com

- *Recommendation 2.2 Regarding the State Board's regulation of dental specialty claims.*

The TSP feels that in order to protect the public from fraudulent claims of specialization, the State Board should have clearly established rules for specialty advertising. The TSP suggests the Texas Medical Practice Act or the more recent Florida Dental Practice Act as possible frameworks the TSBDE could follow. This would require the dentists claiming specialization to provide the TSBDE appropriate verification of agreed-upon minimal requirements of post-graduate training to allow declaration of specialization.

- *Recommendation 3.1 Authorize the board to conduct inspections of dentists administering parenteral anesthesia in office settings.*

The TSP has representation on the TSBDE Anesthesia Work Group (AWG) to further voice our recommendations on the status of dental anesthesia oversight in the State of Texas. Although the TSP is not opposed to office inspections for those dentists that practice enteral and parenteral anesthesia, we feel that an in depth review of past complications with appropriate study and research needs to be done to further assess the cause of complications during anesthesia in the dental office and how we as a profession can provide the best oversight and training to insure beginning and continued competency for all providers offering dental anesthesia. We feel that the AWG will offer appropriate recommendations to the TSBDE and Sunset commission.

The TSBDE AWG should be given the opportunity to:

- 1) Study the details of past case complications (which has not taken place yet), identify how these complications form possible patterns and trends, and
- 2) most importantly, evaluate how these patterns and trends relate to changes in anesthesia rules the Board has relatively recently implemented.

Recommending inspections as the answer to our concerns and questions, is premature and a potential waste of valuable time and potentially millions of dollars, at best.

We need to evaluate whether inspections have been studied and found to improve anesthesia complication rates, not just do something because it looks good to the public and media.

At worst, it leaves the citizens of Texas, for years to come, in a situation of possible increased risk of unfavorable anesthesia outcomes with unfounded remedies that may not improve the safety of their dental appointments. That safety is, for all of us, our prime and utmost concern. The Work Group, which is made up of top of the class anesthesia provider dentists from a cross section of dental specialties across the state of Texas, needs to be afforded the time and



**2015-2017
BOARD OF DIRECTORS**

**E. Todd Scheyer, DDS, MS
President**

3400 S. Gessner Rd., #102
Houston, TX 77063
(713) 783-5442
etsperio@periohealth.com

**Scott Dowell, DDS, MS
Secretary/Treasurer**

4601 Buffalo Gap Rd., Suite A3
Abilene, TX 79606
(325) 437-3456
dowelldds@gmail.com

**Steven Britain, DDS, MS
Secretary/Treasurer Elect**

4900 Overton Ridge Blvd., #213
Fort Worth, TX 76132
(817) 423-0138
britainperio@sbcglobal.net

**Ed Lorenzana, DDS, MS
Director**

3519 Paesano's Parkway, #103
San Antonio, TX 78231
(210) 492-3519
drlorenzana@yahoo.com

**Andrew Barnett, DDS, MS
Director**

4030 N. Central Expressway, #588
Dallas, TX 75204
(831) 277-5163
Dr.Barnett.DentalGPS@gmail.com

**Lisa Masters, DDS, MS
Past President**

7400 Blanco, #100
San Antonio, TX 78216
(210) 349-4424
mastersdds@
mastersdentalgroup.com

Cindy Wainscott
Executive Director
1226 Nautical Lane
Richmond, TX 77469
(281) 414-6813
cwain@periohealth.com

access to records to make informed, grounded and intelligent recommendations for the most positive outcomes for this extremely important area of dental care.

- *Recommendation 3.2 Direct the board to revise rules to ensure dentists with one or more anesthesia permits maintain related written emergency management plans.*

The TSP supports this recommendation and has also provided to the AWG an emergency management plan formulated and endorsed by the American Academy of Periodontology.

- *Recommendation 4.1 Require the board to monitor licensees for adverse licensure actions.*

The TSP supports this recommendation.

- *Recommendation 4.2 Authorize the board to deny applications to renew a license if an applicant is noncompliant with a board order.*

The TSP supports this recommendation.

- *Recommendation 4.5 Direct the board to make data on the board's enforcement activity information publicly available on its website.*

The TSP supports this recommendation.

- *Recommendation 5.1 Continue the State Board of Dental Examiners for 12 years.*

The TSP supports this recommendation.

The TSP appreciates the opportunity to review this report and provide input. We recognize and support the TSBDE's effort to improve the efficiency of oversight in the State of Texas, protecting dentists and the public in the delivery of safe, competent dental care. We look forward to maintaining a productive dialogue on the many issues facing our dental profession.

If you have any questions or concerns regarding any of our recommendations, please do not hesitate to contact me. It is our pleasure to have the opportunity to provide this input.

Sincerely,

E. Todd Scheyer, D.D.S., M.S.
President, Texas Society of Periodontists