

From: [Sunset Advisory Commission](#)
To: [Dawn Roberson](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 09, 2016 3:43:36 PM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 09, 2016 3:35 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: STATE BOARD DENTAL EXAMINERS SBDE

First Name: Karen

Last Name: Tuel

Title: Registered Dental Hygienist

Organization you are affiliated with: Texas Dental Hygienists' Association

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

I agree that the number of board members should be reduced and recommend that hygienists have more representation on the board. My association recommends that the board consist of 4 dentists, 3 hygienists, and 2 public members.

TDHA is opposed to eliminating the Dental Hygiene Advisory Committee. I would like to see the board delegate more responsibilities to the committee regarding licensing, continuing education, and disciplinary matters involving dental hygienists, as well as proposing rules to the full board.

TDHA is opposed to eliminating all dental assistant certificate programs.

Dentists do not have the time to train assistants on-the-job. TDHA feels the public will be at risk if dental assistants are not held to a standard certification process in the 4 areas of exposing radiographs, applying pit and fissure sealants, performing coronal polishing, and monitoring nitrous oxide sedation.

Any Alternative or New Recommendations on This Agency:

See page 20 of the report. The question is: Does the program provide the least restrictive form of regulation needed to protect the public interest?

TDHA believes the practice of dental hygiene in Texas is over-regulated with antiquated statutes which do not protect the public but do control what hygienists can do and where they can do it. Unless seen by a dentist first, hygienists cannot treat patients in long term care facilities, schools, assisted-living facilities, Head Start centers, home bound patients'

residences, and rural areas of the state. TDHA believes hygienists are able to work in a collaborative agreement with dentists to treat these patients within their current scope of practice and refer patients when needed.

Direct access to preventive services provided by dental hygienists is cost effective and will save taxpayer dollars. Texas is one of six states where dental hygienists are not allowed to administer local anesthesia to their patients as needed for pain. This is the standard of care in 44 other states. Dental hygienists who move to Texas are not allowed to make their patients comfortable due to this antiquated rule.

My Comment Will Be Made Public: I agree