



TEXAS SOCIETY OF ANESTHESIOLOGISTS

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January 12, 2024

Casey Nichols
Executive Director
Texas Board of Dental Examiners
1801 Congress Avenue Suite 8.600
Austin, Texas 78701

Via Email: official_rules_comments@tsbde.texas.gov

RE: Proposed Amendments to 22 TAC §115.10

Dear Director Nichols:

On behalf of the more than 3,700 physician anesthesiologist members of the Texas Society of Anesthesiologists (TSA), thank you for the opportunity to comment on the proposed amendments to Texas Administrative Code Chapter 115 Extension of Duties of Auxiliary Personnel – Dental Hygiene rules.

TSA appreciates the Board’s work to ensure the delegation of local infiltration anesthesia to a dental hygienist is done in a safe and appropriate manner to protect Texas patients in dental offices. TSA offers one minor edit to provide clarity to the term “direct supervision” used in §115.10(b)(1). The Board has adopted a definition for “direct supervision” found in the TAC and TSA requests inclusion of a reference to the Board’s definition as follows:

- (1) A Texas-licensed dentist may delegate the administration of local infiltration anesthesia to a licensed dental hygienist, if the dental hygienist works under the direct supervision of the licensed dentist, as defined by 25 Tex. Admin. Code, Section 110.1(7).

Referencing the statutory definition of “direct supervision”, a term used in the Occupations Code pertaining to dental practice and training and delegation to dental assistants and dental hygienists will ensure dentists and dental hygienists exercising this new delegatory authority understand the exact parameters of providing direct supervision to a dental hygienist.

Thank you for the opportunity to provide our comments and concerns regarding the proposed amendments to the Texas Administrative Code Chapter 115 Extension of Duties of Auxiliary Personnel – Dental Hygiene rules. If you have any questions, please contact Elizabeth Farley, Texas Society of Anesthesiologists Governmental Affairs Director, at elizabeth@tsaga.org.

Sincerely,

Udaya Padakandla, MD
President, Texas Society of Anesthesiologists