

January 12, 2024

Ms Casey Nichols, Executive Director
Texas State Board of Dental Examiners
1801 Congress Avenue, Suite 8.600
Austin, Texas 78701
Via email: official_rules_comments@tsbde.texas.gov

Re: Proposed Amended Rule 22 Texas Administrative Code §111.5, *Electronic Prescribing Waivers*, and new rules §114.8, *Retired Registration Status*, §114.13, *Reinstatement of a Cancelled Registration*, §115.10, *Administration of Local Infiltration Anesthesia*

Dear Ms Nichols:

The Texas Dental Association (TDA) is the largest professional dental association in Texas, representing dentists throughout the state who provide essential dental care to Texans.

TDA submits these comments in response to the Texas State Board of Dental Examiners (TSBDE) proposed amended electronic prescribing waiver rule and new dental assistant registration and local anesthetic administration by dental hygienist rules as published in the December 15, 2023, issue of the *Texas Register*.

22 Texas Administrative Code §111.5, *Electronic Prescribing Waivers*

TDA supports the TSBDE's proposed rule amendment, removing the requirement that a dentist must submit a written statement and supporting documentation describing the circumstances necessitating a waiver, and instead requires a dentist to attest to the circumstances necessitating a waiver.

22 Texas Administrative Code §114.8, *Retired Registration Status*

TDA supports the TSBDE's new proposed rule allowing registered dental assistants to apply to the Dental Board to retire their registrations and to reinstate retired registrations.

22 Texas Administrative Code §114.13, *Reinstatement of a Cancelled Registration*

TDA supports the TSBDE's new proposed rule allowing registered dental assistants to apply to the Dental Board to reinstate a canceled registration.

22 Texas Administrative Code §115.10, *Administration of Local Infiltration Anesthesia*

TDA supports the TSBDE's new proposed rule detailing the certification and standards for dental hygienists to administer a local anesthetic agent by infiltration only as set out in House Bill 3824 by Representative Stephanie Klick during the 88th Texas Legislature, Regular Session. The new proposed rule is consistent with House Bill 3824's statutory intent. The rule emphasizes patient safety and sets regulations for education, training, and standard of care.

TDA thanks the TSBDE for its work writing the new proposed rule and for the opportunity to provide input on the qualifications and requirements for the administration of a local anesthetic agent by a dental hygienist.

Thank you for considering TDA's comments on the rule proposals.

Sincerely,



Cody C. Graves, DDS
President