

April 10, 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 §114.5, *Coronal Polishing*, and new rule §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 dental assistant coronal polishing rule and new local anesthetic administration by dental hygienist rule as published in the March 22, 2024, issue of the *Texas Register*.

22 Texas Administrative Code §114.5, *Coronal Polishing*

TDA supports the TSBDE's proposed rule amendments, making it easier for dental assistants to qualify to perform coronal polishing. TDA agrees with removing the work experience requirement for dental assistants graduating from a CODA-accredited dental assistant education program and reducing the work experience requirement before applying to a CODA-accredited coronal polishing education program, from 2 years to 1 year for those dental assistants who did not graduate from a CODA-accredited dental assisting education program.

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 local anesthetic agents by infiltration only, as outlined in House Bill 3824 by Representative Stephanie Klick during the 88th Texas Legislature, Regular Session.

TDA agrees with clarifying direct supervision in the rule by specifying in the rule language that the "delegating dentist is physically present in the facility where the procedure is occurring and is continuously aware of the patient's physical status and well-being."

Furthermore, TDA agrees with reducing the required amount of continuing education (CE) hours for certificate renewal from 6 hours to 2 hours biannually in the administration of, or medical emergencies associated with, local anesthesia specific to the procedures performed by the dental hygienist administering the local infiltration anesthesia. TDA also agrees that the CE hours should be in addition to any CE courses required to renew a dental hygiene license.

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

Sincerely,



Cody C. Graves, DDS
President