



February 5, 2024

Ms. Casey Nichols Executive Director and Board Members  
Texas State Board of Dental Examiners  
1801 Congress Avenue, Suite 8.600  
Austin, TX 78701  
Re: Proposed Rule 115.10 Administration of Local Infiltration of Anesthesia by Dental Hygienists

Dear Ms. Nichols and Board Members of the TSBDE,

The Texas Society of Periodontists board has reviewed the most recently proposed rules regarding §115.10 Administration of Local Infiltration of Anesthesia by Dental Hygienists. We appreciate the opportunity to review and provide our input regarding the most recent version of the rule.

We are submitting this letter to support the rule with one additional comment regarding the continuing education requirement in line item (f)(1). We believe 6 hours continuing education every 2 years is excessive and propose a minimum of 4 hours continuing education every 2 years. As such, the proposed change would read as follows:

(f) Continuing Education

(1)A dental hygienist with a local infiltration anesthesia certificate must complete no less than 4 hours of continuing education every two years in the administration of, or medical emergencies associated with, local anesthesia specific to the procedures to be performed by the dental hygienist administering the local anesthesia. These 4 hours of continuing education may be used to satisfy the technical or scientific requirements of §104.1 of this title (relating to Requirement).

We believe the proposed rule preserves the value of maintaining the TSBDE's mission to prioritize the health, safety, and superior quality dental care for the public. We appreciate the TSBDE's consideration and efforts in creating this new rule.

Respectfully Submitted,

A handwritten signature in cursive script that reads 'Sara A. Bender'.

Sara A. Bender, DDS, MS

President, Texas Society Periodontists