



TEXAS  
SOCIETY  
OF  
PERIODONTISTS

August 29, 2023

Dr. David Yu, Dr. Bryan Henderson, Ms. Casey Nichols, and Ms. Lauren Studdard,  
Texas State Board of Dental Examiners  
1801 Congress Avenue, Suite 8.600  
Austin, TX 78701

Re: New Rule 115.10 Administration of Local Infiltrations of Anesthesia by Dental Hygienists

Dear Dr. Yu, Dr. Henderson, Ms. Nichols and Ms. Studdard,

The Board members of the Texas Society of Periodontists (TSP) appreciate the opportunity to review the proposed Rules pertaining to recently passed legislation §115.10 Administration of Local Infiltration of Anesthesia by dental hygienists. The proposal outlines a comprehensive Rule to implement this new piece of legislation. There are several items in the proposed Rules for which the TSP Board would like comment for consideration.

**Line item (d)(3): Have been engaged in clinical practice of dental hygiene for [X] time immediately preceding initial application.**

The TSP Board strongly favors immediate eligibility of new graduates to apply for application for administration of local anesthesia. We believe it is both counter-productive and lacks rationale to prohibit a new graduate from applying knowledge learned in their training. Postponing a new graduate's application of knowledge in their licensed post-graduate practice could be detrimental to loss of knowledge and clinical proficiency.

**Line item (6): Passed a Board-approved certification examination relating to the administration of a local anesthetic agent:**

The TSP Board would like this TSBDE-approved certification examination to be one approved by the TSBDE of a CODA-approved dental hygiene program rather than a regional board certifying examination (for example, the WREB). CODA-approved dental hygiene programs teaching local anesthetic infiltration are designed to provide and test both didactic and clinical knowledge and competencies through comprehensive didactic and hands-on clinical application time. Conversely, a regional examination is a single evaluation on a specific date and often on mannequin simulators.



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**Line item (e)(1) and (2): Didactic and clinical components of programs to include (X) hours:**

The TSP Board favors a number of both didactic and clinical hours similar to or based on the average hours required by other states. An excessive requirement would prevent applicants from other states to be eligible unless pursuing a TSBDE-approved course to obtain certification. Excessive hours would be prohibitive in nature.

**Line item (e)(2)(E):** The TSP Board supports the current proposal that clinical experiences be performed only under the direct supervision of a Texas-licensed dentist instructor or faculty member. We do not support a local anesthesia-certified dental hygienist instructor or a non-dentist faculty member to perform the direct supervision of a student.

**Line item (e)(3)(B): Examination:** The TSP Board prefers clinical competency examination on live patients. However, we appreciate this standard would be difficult to fulfill. Therefore, we prefer no more than ½ total clinical competencies to be acquired on simulators.

We believe our comments preserve the value of maintaining the TSBDE mission to prioritize health, safety, superior quality dental care for the public. We appreciate your consideration on these specific issues of this new Rule.

Respectfully Submitted,

Sara A. Bender, DDS, MS

President, Texas Society Periodontists