Oct 2, 2021

Testimony

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I am a practicing dental hygienist in private practice, and an educator in a dental hygiene program in Massachusetts. I have also worked as a public health hygienist in the last three years. I wish to comment on the proposed changes in regulations.

Comments on 2.00 changes

1. I disagree with the change to allow “Dental Auxiliaries” to perform screenings when that definition includes dental assistants. Dental assistants assist the dentist in restorative procedures and have no education that focuses on identifying oral disease. The Rule should stipulate Dental Hygienists to perform oral health screenings as described on page 3.
2. I agree with the addition of dental hygienist to the mobile dental facility(MDF) definition. As licensed professionals, dental hygienists have the skills to function in a public realm in a mobile unit.
3. I also agree with the change in definition for the Portable Dental Operation (PDO) to add the practice of dental hygiene, as this how public health dental hygienists operate in the community.
4. I think the change in language for the public health dental hygienist is appropriate: there has been confusion within practicing hygienists about how to go about becoming a public health hygienist. Application for a PDO or MDF permit, as long as the cost for these permits is not prohibitive, discouraging applicants. Underserved communities need the services of public health dental hygienists for prevention strategies and preventive services.

Comments on 5.00 changes

I agree with the changes noted in this section of the regulations

Comments ion 6.00 changes—no comment

Comments on 7.00

I agree with the delineation of duties for the permit holders for PDO or MDF. This clarifies many of the questions dental hygienists have had. I emphasize, however, the cost of the permits must not be prohibitive; dental hygienist need to purchase expensive equipment and maintain monitoring capability, so the permit cost should not be burdensome.

Respectfully submitted

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