

August 7, 1998

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Dr. Norbert O. Gannon, D.D.S.
Chairman
State Board of Dentistry
Commonwealth of Pennsylvania
P.O. Box 2649
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY
REVIEW COMMISSION

Pennsylvania Dental Association

Pennsylvania
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Dear Chairman Gannon:

As the Independent Regulatory Review Commission (IRRC) examines the State Board of Dentistry's proposed rulemaking published in the July 11, 1998 edition of the *Pennsylvania Bulletin*, I am writing, on behalf of the Pennsylvania Dental Association (PDA), to express PDA's support for, and comments on, the proposed regulations.

As you are aware, the Continuing Education and Expanded Function Dental Assistant (EFDA) Regulations impact all of our nearly 6,000 members. In the past, the PDA has provided ample comment to the State Board and our concerns have been addressed in turn. As a result, the membership of the PDA would like to thank the members of the State Board for allowing the PDA to participate in the creation of the proposed regulations.

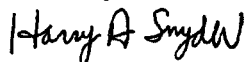
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In reviewing the latest form of the regulations, the only question the PDA would raise relates to Section 33.205a of the proposed regulations. This section appears to be a near duplicate of the "EFDA" definition from the "Definitions" section of the Dental Law. 49 Pa. Code §33.205 (a) (proposed). However, a portion of the law appears to be missing from the regulations. The missing language reads "other reversible procedures not designated by this act to be performed only by licensed dentists or dental hygienists." 63 Pa. C.S.A. § 121 (1994). The PDA would seek inclusion of this statutory language into the proposed regulations.

Once again, thank you for allowing the PDA to participate in the regulatory review process and thanks, in advance, for your time and consideration of these comments. Mr. Aji Abraham, director of government relations for the PDA, is available to the State Board or IRRC to follow up on the points raised in this letter. If you have any questions please contact Mr. Abraham at (717) 234-5941 x105.

Sincerely,



Harry A. Snyder, DDS
President

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