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University of Pittsburgh

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*School of Dental Medicine
Division of Surgical Dental Sciences*

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Salk Hall
101 Terrace Street
Pittsburgh, PA 15261-1933

UNIVERSITY OF PITTSBURGH
REVIEW COMMISSION

January 25, 2005

RE: Dental Anesthesia Regulations 16A-4614

Commission Members,

As a full-time educator in the field of anesthesia in dentistry for the past forty years this is to express my concern over the proposed legislation captioned above.

Of primary concern is the ability of the dental profession to comply with the stated deadline of April 1, 2005 by (1) conducting in-office inspections and (2) providing the necessary number of continuing education hours to the more than 500 dentists that currently hold anesthesia permits.

The University of Pittsburgh is the only school in Pennsylvania to have a department of Dental Anesthesia. We will be presenting continuing education courses to help license permit holders to secure the mandated educational hours. However, we are overwhelmed by applications for our programs and cannot possibly fulfill all requests.

I have not seen any similar courses advertised by the University of Pennsylvania or Temple's dental schools.

In addition to the profession's inability to comply with demands the proposed regulation the regulation itself is confusing, self-contradictory and in fact, proposes practices that are in violation of the standard of care.

For example, the regulation proposes that when general anesthesia or deep sedation is administered to a pediatric patient it must be administered by a person solely dedicated to anesthesia administration and patient monitoring. The dentist performing the dental procedure must not be involved in the administration of the anesthesia.

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Cleft Palate Craniofacial Center
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Dental Hygiene
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Fax: 412-383-8737

**Department of Dental Medicine
UPMC Presbyterian**
412-648-6730
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Maxillofacial Prosthodontics
412-648-6730
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Oral & Maxillofacial Surgery
412-648-8604/648-6801
Fax: 412-648-3600/648-6835

Periodontics
412-648-8602
Fax: 412-648-8594

Does this description not imply that the operating dentist may be involved in the administration of the anesthesia when the patient is an adult? Serving as both operator and anesthetist is in violation of the standard-of-care in the field of anesthesiology. The practice is unheard of in the hospital setting and the law does not allow a patient to be "less safe" in one environment then in another!

Hopefully, my comments will assist in the process of formulating a meaningful regulation that will truly provide for increased patient safety and not merely be enacted to meet an arbitrary deadline.

Thank you.

Sincerely yours,

A handwritten signature in black ink that reads "C. Richard Bennett". The signature is written in a cursive style with a prominent initial "C" and a long, sweeping underline.

C. Richard Bennett, D.D.S., Ph.D.
Professor and Chairman
Department of Anesthesiology