

WEST VIRGINIA DENTAL ASSOCIATION

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July 16, 2007

Donald S. Clark, Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Room H 135
Washington, D.C. 20580



Re: South Carolina State Board of Dentistry Docket #9311

Dear Secretary Clark:

This Association supports comments presented you by the American Dental Association in its letter of July 13, 2007, requesting you withdraw your consent decree in the above Docket.

This Association respectfully presents additional comments for your consideration in its request for your Commission to withdraw its consent decree in the above Docket.

1. It appears your ruling was made without benefit of clinical expertise, or evaluation or comparison of the various levels of education and training of dentists and dental hygienists.
2. Dental hygienists are educated and trained to provide specific services under the supervision of a dentist. To allow independent practice by hygienists, as your ruling allows, would require changes in the curriculum of in dental hygiene education programs.
3. Allowing dental hygienists to provide all preventive services without an appropriate exam and diagnosis by a dentist, as your ruling would permit, places the welfare and safety of the patient in jeopardy and seriously compromises care. For example: Your ruling can result in undiagnosed decay being covered with a sealant by hygienists who are neither educated nor trained to diagnose oral diseases or interpret x-rays to diagnose decay, as are dentists.
4. While dental hygienists may provide certain services in certain clinical settings without the benefit of the supervision of a dentist, not all preventive services can safely be provided in all settings as your ruling permits.

Your consideration of the above comments is appreciated, and withdraw of your consent decree is respectfully requested.

Very truly yours,

Richard D. Stevens, Executive Director
West Virginia Dental Association