Supervision Requirements for Dental Hygienists vs. Public Health Dental Hygiene Practitioners

The recent publication and dissemination of regulations developed by the State Board of Dentistry to govern the practice of Public Health Dental Hygiene Practitioners (PHDHPs) has sparked great interest among dental health professionals and others – and some misunderstanding about Pennsylvania’s requirements for supervision of dental hygienists.

The board office has received numerous calls from dentists and hygienists who are concerned or curious about the application of the new regulations in their own practices. A brief news segment produced and broadcast by the Harrisburg ABC affiliate has raised public awareness of the role of the dental hygienist and, somewhat incorrectly, the issue of supervision requirements. State Board of Dentistry Chairman John V. Reitz, D.D.S. responded in writing to correct the misleading impression conveyed by this report and provided detailed information regarding supervision requirements for the licensed practice of dental hygiene in Pennsylvania.

Much of the current confusion about dental hygiene supervision requirements stems from legislation establishing the new hygienist classification (PHDHP), intended to promote oral health and overall wellness among Pennsylvanians who receive dental services in a public health setting.

Dental hygienists who acquire PHDHP certification may provide dental hygiene services “without authorization, assignment or examination by a dentist” in specific public health practice sites: schools, correctional facilities, health care facilities, personal care homes, domiciliary care homes, older adult daily living centers, continuing care facilities, Federally Qualified Health Centers and FQHC “look-alikes,” public or private institutions under the jurisdiction of a federal, state, or local agency, and free and reduced-fee nonprofit health clinics.

In all other practice sites, certified PHDHPs are restricted to the scope of practice and supervision requirements for dental hygienists. Qualifications to obtain the PHDHP certification include:

- 3,600 hours of dental hygiene practice under the supervision of a licensed dentist, and
- Professional liability insurance in the minimum amount of $1 million per occurrence and $3 million per annual aggregate.

Additionally, provided that the patient is free of systemic disease or suffers only from mild systemic disease, hygienists, under general supervision, may perform periodontal probing, scaling, root planning, polishing or another procedure required to remove calculus deposits, accretions, excess or flash restorative materials and stains from the exposed surfaces of the teeth and beneath the gingiva.

If the patient is suffering from systemic disease that is severe, incapacitating, or life threatening, these procedures must be done under “direct supervision,” which requires the dentist to examine the patient, authorize the procedure to be performed, be physically present in the dental facility and available during the performance of the procedure, and examine and take full professional responsibility for the completed procedure.

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Similarly, hygienists may only administer local anesthesia by regional injection under direct supervision and pursuant to board regulations at 49 Pa. Code § 33.115.

The board's dental hygiene supervision requirements are slightly different for non-PHDHP hygienists who work in public or private institutions such as schools, hospitals, public health care agencies, nursing homes, mobile health units and homes for juveniles, the elderly and the handicapped, or institutions under the jurisdiction of federal, state or local health agencies. In those facilities, dental hygienists may perform periodontal probing, scaling, root planning, polishing or another procedure required to remove calculus deposits, accretions, excess or flash restorative materials and stains from the exposed surfaces of the teeth and beneath the gingival under general supervision. The dentist must still authorize and take full professional responsibility for the performance of the dental hygienist, but a single authorization may, when appropriate, apply to one or more classes or categories of students/patients.

Two-Pronged Test for Dental Hygiene Services without Supervision of a Dentist:

1) Does the practitioner hold current certification as a Public Health Dental Hygiene Practitioner issued by the State Board of Dentistry?

2) Is the practice site one of the nine public health settings in Public Health Dental Hygiene or Practitioner regulations?

In order to provide dental hygiene services without the supervision of a dentist, the answer to BOTH questions must be “Yes.”

For additional information on PHDHP certification, continuing education and practice sites, please contact the board office at 717-783-7162 or by e-mail at st-dentistry@state.pa.us.

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