



November 17, 2020

Jackie Weist Lutz, Board Counsel  
State Board of Dentistry  
PO Box 69523  
Harrisburg, PA 17106-9523

Ms. Lutz,

Thank you for the opportunity to share our comments regarding Regulation 16A-4633 regarding Public Health Dental Hygiene Practitioner Sites. While PAGD has concerns about the expansion of PHDHP practice and its impact on the safety and care for Pennsylvanians with unmet dental needs, we commend the State Board of Dentistry for its careful consideration and amendments in the final regulation.

As noted in PAGD's comments during the proposed regulation public comment period, we contend the provision of services in places of residence represented a substantial safety risk if the practitioner is not adequately prepared. The board addressed that risk by removing this language for later consideration. If ultimately addressed by the board in future regulation, PAGD requests that the following requirements be instituted, which are already required for hygienists practicing independently in Maryland, California, Minnesota, and South Dakota:

- Requirements for curricular hygiene education addressing emergency medical care.
- Current Basic Life Support (BLS) certification.
- An additional ten hours of continuing education in emergency medical care required for PHDHP licensure.
- Emergency life support equipment such as Automatic External Defibrillators (AEDs) be present.

PAGD also commends the board for requiring PHDHP practice in physicians' offices be limited to Dental Health Professional Shortage Areas (DHPSAs). The public health capacity of a PHDHP intimates that the PHDHP should serve in an underserved area. The requirement for PHDHP physician's office practice in DHPSAs should help to address potential expansion to areas with adequate comprehensive care alternatives.

Notwithstanding what we consider the positive amendments to this regulation, PAGD feels that measures like this are detrimental to what should be the combined efforts of all Pennsylvania oral health stakeholders. We feel that all Pennsylvanians should be given adequate access to full comprehensive care by the entire dental team. Efforts like this "lower the floor" for care for low income Pennsylvanians by creating an avenue for limited hygiene services and codify a tiered system where those with financial means and the commercially insured are provided alternatives for care that are not available to the impoverished and those on Medical Assistance (MA).

PAGD calls for all government, private, and community stakeholders to develop solutions that allow for the financial viability of providers that accept MA patients, restore the full adult benefit under MA, and create incentives and programs that address the maldistribution of practices that

drives practitioners away from rural areas. This is the system of care that we have established for Pennsylvanians with means, it should guide our efforts and our vision for all Pennsylvanians.

Thank you,



Leigh Jacopetti-Kondraski, DMD  
President  
Pennsylvania Academy of General Dentistry

CC: Independent Regulatory Review Commission  
Rep. Kathy Rapp, Chair, House Health Committee  
Rep. Dan Frankel, Democratic Chair, House Health Committee  
Rep. David Hickernell, Chair, House Professional Licensure Committee  
Rep. Harry Readshaw, Democratic Chair, House Professional Licensure Committee  
Sen. Robert Tomlinson, Chair, Senate Consumer Protection and Professional Licensure Committee  
Sen. Lisa Boscola, Minority Chair, Senate Consumer Protection and Professional Licensure Committee  
Sen. Michelle Brooks, Chair, Senate Health and Human Services Committee  
Sen. Art Haywood, Minority Chair, Senate Health and Human Services Committee