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**From:** Catherine Fillmore  
**To:** ST\_RegulatoryCounsel  
**Subject:** [External] Opposition to Regulation #16A-4633 Expansion of Public Health Dental Hygiene Practitioner Practice Sites  
**Date:** Wednesday, April 17, 2019 9:41:36 AM

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Hello Ariel,

I am writing to you out of concern for a new regulation being considered in Pennsylvania that would allow dental hygienists independent practice outside of a dental office setting. While I understand the intention is to expand access to care for children I fear that allowing hygienists to practice outside independent of a dental office will actually set up a system where many children will have delayed access to needed dental care. Dental hygienists are not trained to diagnose dental caries or other oral pathology. I am concerned that parents may think since their child saw a "dental practitioner" that they have had a thorough exam to rule out any oral pathology and do not need additional treatment. This may be incorrect and may delay a patient from establishing a dental home by age one as recommended by the American Academy of Pediatric Dentistry. I believe this initiative will actually result in delayed care for many patients as they will not seek to establish a dental home and have needed treatment done in a timely manner and will cause more emergency treatment and more extensive treatment needs for many children. This may also open physicians to additional liability as they do a visual screening exam as part of their well child exams and this combined with a cleaning by a hygienist may cause parents to think their child had a dental exam when in fact they may well have untreated dental caries that will present at a later date with pain or infection. Please consider changing this resolution so that all children who have any form of dental treatment, including dental cleanings, will do so as part of a dental home where they have adequate access to treatment by a dentist as needed. Thank you very much for your time and consideration in this manner.

Sincerely,

Catherine Fillmore, D.D.S.

Diplomate of the American Board of Pediatric Dentistry

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