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From: David Dutkowski
To: ST. Regulatory Counsel
Subject: [External] Draft Proposed Regulation 49 Pa. Code @ 33.205b
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Dearest Colleagues,

I am writing with great concern about the proposed regulations to allow hygienists to provide dental care in settings which are not supervised by a licensed dentist.

While hygienists are wonderful members of a dental team, they lack the training, education, and clinical judgement to safely treat patients without a dentist's input and supervision. Unfortunately, much of the public will be unable to make this distinction and will be put at risk as a result. It is the responsibility of the board to ensure that dental care provided in Pennsylvania meets at least the minimum standards of care. This proposal violates that obligation.

One portion of this proposal allows hygienists to practice in a physician's office. My wife is a Board Certified Internist. We went to medical/dental school together at the combined program at the University of Connecticut, and I have watched and shared with her as she has gone through residency and into practice. Despite her enhanced exposure to dentistry through her education and being married to a dentist, I can state without reservation that patients seen by a hygienist in her office would receive substandard care. She does not have the training, experience, or clinical tools to evaluate patients like a dentist does, and neither would the hygienist that she would be supervising.

Another argument for this proposal is that it would increase care for underserved populations. While this is a noble goal, it will be impossible to limit care to these areas. If you were a hygienist, would it be more financially sensible to set up practice in a wealthy or a poor area? Would it even be financially viable to practice in impoverished regions? I suggest that the long-term result of this proposal would be to have hygienists practicing in areas which do not need any additional services, and avoiding the high-needs areas for the same reasons that they are currently underserved by the rest of the profession.

For these reasons and many more, I implore you to abandon this misguided proposal.

Sincerely,

David Dutkowski, DMD, MAGD