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From: To: Subject: Date: Kathi Grab 5T. RegulatoryCounse! [External] Regulation #16A-4633 Monday, April 22, 2019 10:53:22 AM APR 26 2019

Independent Regulatory Review Commission

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To whom it may concern:

I am writing in opposition of the Regulation #16A-4633: Public Health Dental Hygiene Practitioner Practice Sites.

As a board certified pediatric dentist, I oppose the idea of having a dental hygienist seeing children in a pediatrician office setting. Though, I agree that there needs to be improved access to care, I do not believe that this is the way to go. Parents whose children have not seen a dentist will assume that they are doing all that they need to do dentally for their child if seen by a dental hygienist in a pediatrician's office.

Registered dental hygienists have a 2-4 year education as opposed to a nurse practitioner who have 6-8 years of education. Parents will assume that the dental hygienist's services will replace the need to see a dentist. A dental hygienist cannot independently diagnose dental disease and develop a treatment plan. This is be very misleading to parents. Parents will have the false security of thinking that they are providing their child with the necessary dental care that is recommended.

Sincerely,

Angela S. Lutz, D.M.D. Board Certified Pediatric Dentist