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**EDUCATION PLUS HEALTH**  
SCHOOL BASED HEALTH CENTERS

**RECEIVED**

**APR 26 2019**

Independent Regulatory  
Review Commission

Regulatory Counsel  
Department of State  
PO Box 69523  
Harrisburg PA 17106-9523  
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4/18/2019

**Subject: Rulemaking 16A-4633 (Public Health Dental Hygiene Practitioner Practice Sites)**

Dear Regulatory Counsel, John F. Erhard, III, DDS, Chairperson and State Board of Dentistry Members,

- Education Plus Health

Education Plus Health is the leading nonprofit in the region advocating for school-based health centers (SBHCs) as a critical source of healthcare for underserved students. In conjunction with afterschool programming and post-secondary education, Education Plus Health is working to create new opportunities for students at every life stage by increasing academic performance and access to high quality healthcare.

Education Plus Health supports Rulemaking 16A-4633 to enable the inclusion of Public Health Dental Hygienist (PHDHP) into both primary care *and* school based health centers in order to dramatically improve the oral health of Pennsylvania's low-income children and adolescents. With adoption of this rule, Education Plus Health would integrate a PHDHP into all 14 of its School Based Health Centers in Title one schools to improve utilization of preventive oral health care and entry into a medical home.

Be brief and succinct but share how these changes will provide better access to care for patients and get them to a dental home. Some suggestions for discussion.

- Dental caries or tooth decay is one of the most prevalent chronic diseases among children in the United States. It is prevalent in over 50% of children aged 6 to 11 years regardless of socioeconomic, and increases considerably among adolescents.
- Asthma is associated with higher dental caries because of dry mouth and sugar-containing inhalers. More than 23% of students served by the Education Plus Health School Based Health Centers have asthma. Thirty percent (30%) of students assessed have uncontrolled asthma and use their asthma inhaler frequently.
- Just 35% of students in the required grades submitted proof of semi/annual dental exam last year.
- Just 6% of students in the required grades utilized the school's dental partner last year.
- The integration of a PHDHP into the School Based Health Centers will enable all consenting children and adolescents receive preventing screenings and cleanings (70% of 7,000 low-income students in Philadelphia and Reading), and a warm hand off to one of our mobile dental partners.
- School Based Health Center providers across the state (7) will be able to integrate a mobile PHDHP within their practice.

In summary, Education Plus Health **supports** rulemaking 16A-4633 Public Health Dental Hygiene Practitioner Practice Sites and respectfully requests acceptance of the rulemaking as proposed.

Thank you for your consideration and support.

Sincerely,

Executive Director  
Education Plus Health, Inc.