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From: To: Mall Inc

ST. RegulatoryCounsel

Subject: Date: [External] PHDHP expanded scope bill Friday, April 19, 2019 8:18:54 PM

Independent Regulatory Review Commission

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I wish to strongly oppose any changes in practice venues for dental hygienists. Practicing in a physician office is extremely problematic. Beyond not ensuring access to care since MDs can practice wherever they please, the risk of substandard patient care is obvious since lack of proper clinical and radiographic analysis by a licensed dentist is absent. Having completed a GPR and fellowship at a large teaching hospital in Philadelphia I can testify first hand the almost total lack of oral education physicians receive. In no way are they qualified to diagnose oral disease.

Hygienist practice in home settings suffers from many of the same problems. Only hygienists certified in CPR and emergency life care should be allowed to practice in such settings. Otherwise patient safety is compromised. I personally have seen patients in such locales and the challenges of treatment due to the patients physical condition and general debilities can be difficult.

Finally, what of liability? The costs of insurance alone can be daunting to any hygienist.

Please reconsider this bill. It benefits very few and dilutes quality of dental care delivery diminishing public perception of my profession.

Respectfully, Harry L Habbel, DDS Sent from my iPad