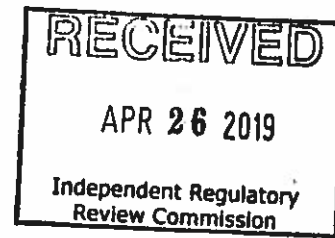


3228



Regulatory Counsel  
Department of State  
PO Box 69523  
Harrisburg PA 17106-9523  
[RA-STRegulatoryCounsel@pa.gov](mailto:RA-STRegulatoryCounsel@pa.gov)

April 22, 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,

The PA Coalition for Oral Health is a diverse group of leaders from across the state from schools of public health, philanthropic organizations, businesses, dental and medical organizations, federally qualified health centers, health insurance firms, advocacy organizations and other community champions. Our mission is to improve oral health for all Pennsylvanians by uniting stakeholders to advance advocacy, policy, education and innovative approaches. We accomplish this through the advance of policies and practices that increase access to oral health services and prevention education, especially for our most vulnerable Pennsylvanians.

PCOH is writing today to express support for the regulatory changes to allow Public Health Dental Hygiene Practitioners (PHDHPs) to practice in more settings. These changes will provide better access to care for patients and assist them in finding a dental home. PHDHPs are not permitted to diagnose, but they can assess a patient and provide a warm hand off to a dental home while providing preventive services. Medical/dental integration is especially relevant with the expansion into medical offices. Oral health needs to be integrated in all aspects of healthcare.

The role of expanded practice dental hygienists across the nation evolved due to the lack of cost-effective access to preventive oral health care and the need to increase oral health literacy across the nation. There is research basis for the statement that at least 75% of oral disease can be prevented through education around and practice of preventive oral health practices.

Under their certification, PHDHPs must make a referral to a dentist once per year regardless of their practice setting. This requirement encourages patients to establish a dental home for comprehensive care. If the patient chooses to not have a comprehensive exam completed by a dentist, this would not preclude the patient from continuing to receive preventive services with a PHDHP. The rapport and trust that a PHDHP establishes with the patient has the potential to guide reluctant dental patients into dental offices, and increases the likelihood that they will utilize the referral to a dentist.

In summary, PA Coalition for Oral 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,

Helen Hawkey, Executive Director  
PA Coalition for Oral Health

[info@paoralhealth.org](mailto:info@paoralhealth.org) • [www.paoralhealth.org](http://www.paoralhealth.org) • 724.972.7242 • PO Box 242, Delmont, PA 15626

*Working to improve oral health for all Pennsylvanians by uniting stakeholders to advance advocacy, policy, education and innovative approaches.*