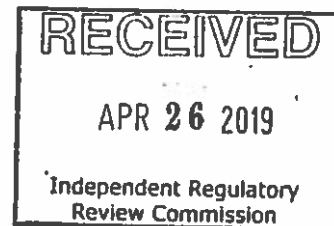




Pennsylvania
Dental Hygienists' Association

PENNSYLVANIA SOCIETY OF
ORAL & MAXILLOFACIAL SURGEONS

PSOMS



April 22, 2019

Ms. Ariel O'Malley, Counsel
State Board of Dentistry
Department of State
PO Box 69523
Harrisburg, PA 17106-9523

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

Dear Ms. O'Malley:

On February 8, 2019, representatives from the Pennsylvania Dental Association (PDA), Pennsylvania Society of Oral and Maxillofacial Surgeons (PSOMS) and Pennsylvania Dental Hygienists' Association (PDHA) met in a spirit of collaboration to discuss access to dental care in Pennsylvania and barriers that exist for both patients and providers.

Our organizations specifically addressed the proposed regulations expanding practice site locations for Public Health Dental Hygiene Practitioners (PHDHPs) to include child care and primary care settings, and residences of homebound and hospice patients. We reached a consensus on several key areas that we feel will reinforce or enhance standards of care, as well as patient well being and safety. We respectfully request that the SBOD consider our recommendations as the draft regulations move through the regulatory process.

We offer the following recommendations:

1. Require PHDHPs to apply sealants using current evidence-based guidelines and manufacturers' instructions when placing sealants in all practice site locations, including those in which PHDHPs are currently authorized to practice.
2. Add a provision that PHDHPs strive to provide clinical services to those patients who report they have not been treated by a dentist within the past year or do not have a dental home.
3. Add a regulation requiring PHDHPs to use a referral form that includes specific language that patients should schedule an appointment with a dentist for a thorough examination and diagnosis. We believe that standardizing the referral process between PHDHPs and dentists is essential to patients benefiting from a continuity of care and achieving better health outcomes.

We thank you for your attention to this important issue and your consideration of our recommendations. Please contact us should you wish to discuss this further.

Sincerely,



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