



Keystone First

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Independent Regulatory
Review Commission

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Regulatory Counsel
Department of State
PO Box 69523
Harrisburg PA 17106-9523
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Subject: Rulemaking 16A-4633 (Public Health Dental Hygiene Practitioner Practice Sites)

Dear Regulatory Counsel,

Keystone First is a mission-driven company dedicated to helping members get care, stay well and build healthy communities. Building healthy communities begins with working collaboratively with leaders, stakeholders, families and individuals to identify the needs, the available resources, implement a plan and act on it.

According to the Pennsylvania licensing department, there are over 900 licensed Public Health Dental Hygiene Practitioner (PHDHPs), and most are not working as a PHDHP within alternative settings. We believe this represents an underutilized and potential workforce resource. Providing Public Health Dental Hygiene Practitioners the opportunity to work independently across multiple settings within the community would allow a current unmet oral health care need to be addressed and serve to increase access to oral health care.

Acceptance of rulemaking 16A-4633 would increase the ratio of oral health professionals to population.

- PHDHP's working within medical practices would be available to screen, provide oral health services, act as a gatekeeper and facilitate a dental connection to a permanent dental home.
- PHDHP's working within long term care facilities would be available to meet with clients and families to address oral health concerns, provide oral health education to the family, individual and staff in addition to preventive dental care.
- PHDHP's working with a healthcare facility to provide preventive services to the homebound would be available to screen, provide preventive services thereby, reducing transportation costs to perhaps 1x year for needed comprehensive exams and restorative services.
- PHDHP's working within prenatal clinics would have an opportunity to positively impact pregnancy outcomes by introducing the importance of oral health care to expectant women.
- PHDHP's working within multiple settings have the potential to reduce emergency department visits by improving oral health literacy and increasing access to oral health care.

Public Health Dental Hygiene Practitioners are educated, experienced dental professionals who are well equipped to work independently within alternative settings to assist with meeting the oral health care needs of the community while improving oral health literacy and access to care. In addition, a Public Health Dental Hygiene Practitioner through the provision of integrative care and oral health services would assist to reduce the co-morbidities associated with oral and systemic health (diabetes, pre term labor, cardiovascular disease, bacterial pneumonia & others).

In summary, Keystone First **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.

Respectfully,



Lawrence Paul, DMD
Vice President Corporate Dental
AmeriHealth Caritas



Joanne McFall
Market President
Keystone First