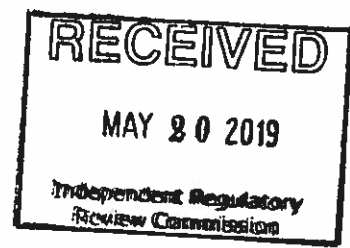


3228



From: Matthew Conquest
To: ST. Regulatory Counsel
Subject: [External] Regulation #16A-4633: Public Health Dental Hygiene Practitioner Practice Sites
Date: Monday, May 13, 2019 2:41:50 PM

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To: Ariel O'Malley
Board Counsel
Pennsylvania State Board of Dentistry

Re: Regulation #16A-4633: Public Health Dental Hygiene Practitioner Practice Sites

While I can appreciate the good intentions, I believe that the state dental board would be making a poor and very regrettable decision in passing this regulation. I oppose this legislation.

Providing access and care to undeserved Pennsylvania populations, and in particular children, is vital to the states dental health initiative but this care needs to be provided under the supervision of a licensed dentist. Without this supervision, who is to say that these patients are being properly evaluated and their oral conditions being diagnosed? Hygienists are not qualified to diagnose caries but yet would be authorized to apply sealants. Are they applying these sealants over caries? Are these sealants being applied correctly in a dry environment? Can the hygienist apply and use a rubber dam properly? What about radiographs? Standards of care?

This program will give these patients, our most vulnerable patients, a false sense of security, leaving them with the belief that they have seen a dental professional and are under the care of a qualified dentist. This of course would not necessarily be the case.

Where would these offices and be located? Are there pediatrician offices in our states under served areas? What constitutes an under served area in Pennsylvania?

This regulation dos not seem to have been very well thought out. I think that an open forum should be held and the opinion of general dentist, pediatric dentists, and their respective associations should be considered.

Thank you.

Matt Conquest

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