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From: Pam.crumrine
To: ST_RegulatoryCounsel
Subject: [External] Regulation #16A-4633 Public health RDH's practicing Independent of licensed dentists
Date: Monday, May 13, 2019 12:27:47 PM

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Dear Board Counsel O'Malley,

It has come to my attention that the PA state board of dentistry has chosen to give permission to registered dental hygienists to practice without the direct oversight of a licensed dentist. It is my understanding that exact parameters and specifics were not per of this legislation. I also understand that the board is considering giving those same public health hygienists the ability to practice in the following settings: pediatric health offices, daycare centers, etc.

I do not feel that this is in the best interest of the Pennsylvania citizens. I have several concerns. First, who would be responsible for the treatment and diagnosis? Hygienists are not trained or board certified to recognize radiologic signs of oral cancer, for example. Additionally, I believe that this is merely an attempt for these organizations to bill insurance for cleanings and exams, etc. sadly, no licensed exam will actually be done. Also, who will be responsible for referring important care such as surgical intervention, perhaps endodontic involvement, and caries.

In my professional opinion, hygienists need to be under the umbrella of a pediatric, general, or periodontics practice, where proper evaluation and diagnosis can be made, specialty referrals given, and in cases needing prescriptive medications, those being available to The Pennsylvanian citizens, also.

Please do not go forward with the bill set forth in Regulation #16A-4633.

Sincerely,
Pamela Crumrine DDS
Georgetown University School of Dentistry class of 1990

Sent from my iPhone