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Pennsylvania
Academy of
Pediatric
Dentistry



May 1, 2019

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Pennsylvania Department of State P.O. Box 69523
Harrisburg, PA 17106-9523

Ms. O'Malley:

As President of the Pennsylvania Academy of Pediatric Dentistry (PAPD) on behalf of our members, I am contacting you to comment on the State Board of Dentistry regulation #16A-4633. The proposal would allow public health dental hygiene practitioners to work in pediatrician's offices, child care settings, and nursing care.

The PAPD and the American Academy of Pediatric Dentistry (AAPD) oppose this proposal. Under our current national policy, such a regulation would not promote a dental home for children as described in the following document:
http://www.aapd.org/media/Policy_Guidelines/P_WorkforceIssues1.pdf.

Additionally, we are concerned that parents/guardians would receive a false sense of security by believing that a dental hygienist seeing a child in a pediatrician's office would negate the need to see a dentist to establish a dental home by age one.

We are concerned that this regulation is inconsistent with the American Academy of Pediatrics' policy on Maintaining and Improving the Oral Health of Young Children as described in:

<http://pediatrics.aappublications.org/content/134/6/1224>

Our organizations are concerned that this regulation would allow a dental hygienist to function as a gatekeeper for referral to a dentist and subsequent dental care when dental hygienists are not trained or experienced for such a role. A dental hygienist cannot independently diagnose dental disease and develop a

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dental treatment plan, by law. Further, the dental screenings and fluoride varnish treatments and referrals to a dentist that pediatrician offices are encouraged to provide can already be accomplished by the pediatrician, nurses or other pediatric office staff.

The Pennsylvania Academy of Pediatric Dentistry and the American Academy of Pediatric Dentistry promote the establishment of a dental home for all children by age one. This regulation hinders rather than promotes such a goal.

Sincerely,

Peter J. Ross, D.M.D.

President, Pennsylvania Academy of Pediatric Dentistry