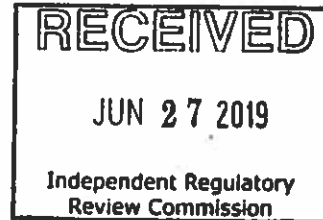


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Dr. Jack Erhard, Chair
Pennsylvania State Board of Dentistry
P.O. Box 2649
Harrisburg, PA 17105-2649



Dr. Erhard,

I write to you with serious concerns about Draft Proposed Regulation 49 Pa. Code @ 33.205b. It is my understanding that the SBOD will discuss this at its upcoming July meeting. I feel that the expansion of PHDHP independent practice to the sites addressed in the draft proposed regulation jeopardizes patient safety while perpetuating a tiered system of care that provides limited additional access to address unmet dental needs.

I own a solo family practice in Quakertown PA. I have a team of 7 people that help me to provide care to a broad patient base. I participate in Donated Dental Services, offer free children's cleanings during Children's Dental Health Month, and often discount services for those who are in extreme need. Based upon my experience, no matter where you allow a person to seek dental treatment, it does not mean they will go. The no show rate is very high for those on a public assistance program and I do not feel that access to care is the chief concern. I firmly believe that education is the key and we should be putting more effort toward educating the population on the importance of a healthy mouth. Instead of allowing hygienist to practice outside their scope, maybe supplementing or providing grants to those who are willing to go out and educate the public and more marketing toward the importance would be money better spent.

Please take the following considerations in your discussions:

- Expanding practice to physicians' offices does not necessarily provide additional access to care. Physicians can locate their practice where they see fit, including high-access or affluent areas of the state.
- In-home treatment, especially for the medically compromised with health complications, is inherently risky. It should not be attempted by someone without emergency care training, Basic Life Support certification, and portable life-saving equipment.
- There is no consideration or statement of who will be held civilly liable for malpractice or if the standard of care is not met for services provided by a PHDHP in a physician's office or child-care setting. Additionally, there is no statement regarding the supervisory responsibilities for physicians.

I recommend the State Board of Dentistry take the opportunity to amend these regulations with the goal of ensuring patient safety while fulfilling the original goal of PHDHP treatment, which is getting more people into a dental home.

Thank you,
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