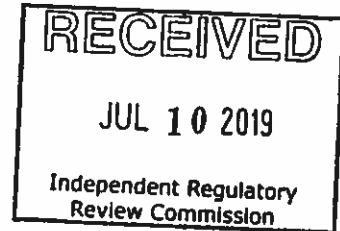


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Dr. Jack Erhard, Chair
Pennsylvania State Board of Dentistry
P.O. Box 2649
Harrisburg, PA 17105-2649

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.

As a general dentist, who has been in practice for 26 years, I am quite familiar with the risks associated in managing patients on a daily basis. **Our practice, consisting of 13 full and part time employees..... conducts routine training in dental emergencies that requires every member of our staff with specific responsibilities.** Allowing hygienists to work in independent sites is fraught with risks....~~especially to the patients.~~ In addition, our practice has expanded its position in the community to provide necessary care for patients that do not currently have a dental home, offering these patients routine care at little or no cost. In Lancaster County, we have many resources to allow those in need of dental services and routine hygiene to find a dental home in a practice or clinic.

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

Yours truly,

A handwritten signature in black ink, appearing to read "Matthew D. Freedman". The signature is stylized with a large, looped "M" and a long, sweeping underline.

Matthew D Freedman, DMD, MADG, FICD, FAGD
Office 717-392-8376