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Independent Regulatory
Review Commission

From: Rick Knowlton
To: ST_RegulatoryCounsel
Subject: [External] Upcoming Vote on PHDHP
Date: Sunday, July 7, 2019 11:19:17 PM

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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 have been practicing dentistry for the last 35 years. I have been very active in organized dentistry for most of this time. We have for the last 35 years given countless amounts of free dentistry to those patients that need care. My heart goes out to those in need. We do not need to expand the PHDHP's to solve this problem. We need to look for ways to streamline the bureaucracy of government to make it easier to participate with those on welfare. I treat many of those patients but do not submit the paperwork because of how complicated it is.

I have throughout my career believed that the most effective and efficient way to treat our patients whether it is those in need or those that are capable of affording dental care is by way of the current dental home of dentists, RDA's, EFDA's, and RDH's all under one roof. Any other means risks to the safety of the patients they treat.

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,

Richard Knowlton DMD, MAGD