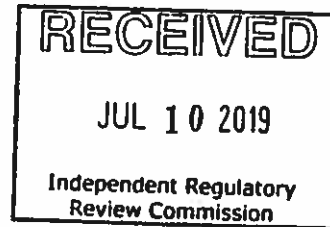


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Dr. Jack Erhard, Chair  
Pennsylvania State Board of Dentistry  
P.O. Box 2649  
Harrisburg, PA 17105-2649

Dr. Erhard,

I am writing 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 and significant potential problems.

**I have been a solo general dentist for over 30 years. I have recently employed one Public Health certified Dental Hygienist....for a VERY short period of time for the following reasons. This Hygienist completed ALL of her patients in only 20 minutes. She felt that she had adequately performed a periodontal check, oral cancer screening, needed X Rays, a good prophylaxis, and home care instructions for each patient in 20 minutes. I can only imagine the quality of care this hygienist will provide to underserved patients when she works UNSUPERVISED....without a DENTIST to evaluate the true needs of her patients. In addition, I personally have several family members who are physicians, and they admit that they are truly clueless in evaluating dental problems and needed treatment. Please consider the above and the following in your discussions regarding the proposed regulation.**

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,

Susan I. Susang DMD