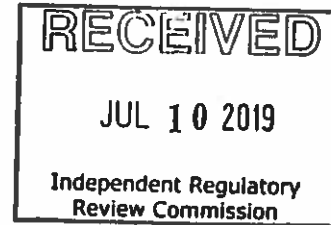


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William A Octave, DMD, FAGD  
430 Lakewood Road  
Greensburg, Pa 15601

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



July 1, 2019

RE: Draft Proposed Regulation 49 Pa. Code @ 33.205b

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.

My credentials include 44 years of dental experience in private practice and teaching at 3 major universities and one community college. ( full\* and part time Penn, Pitt, VCU\*, WCCC). During this time, I was privileged to participate in many "MOM Projects" with my students and colleagues in 4 states (and, continue to do so) I have extensive experience in assisted living and geriatric dentistry and can say without reservation or fear of contradiction that this proposal, as structured, is not in the interest of better dental health

I would ask you to 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 are just some examples.
- 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 and access to dental care; and to fully reconsider this proposal as written.

Thank you,

William A Octave DMD FAGD, FASDC, FACD  
Adjunct, Asc Professor,  
Diagnostic Sciences; Emergency Clinic  
University of Pittsburgh, SDM  
[wao4@pitt.edu](mailto:wao4@pitt.edu)  
[plck12@aol.com](mailto:plck12@aol.com)