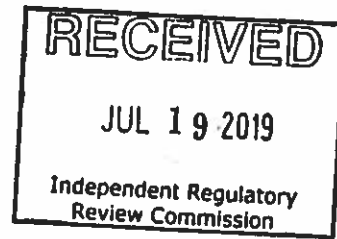


3228



From: Paul Kruth
To: ST. Regulatory Counsel
Subject: [External] Draft Proposed Regulation 49 Pa. Code@ 33.205b
Date: Tuesday, July 9, 2019 11:03:15 AM

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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 am part of a group practice in York, Pennsylvania where I am partners with two other dentists. I have been practicing dentistry in this location since finishing my 2 year GPR at York Hospital in 1997. I love being part of the dental profession where we are able to help people better care for their oral health and keep their teeth for a lifetime. So many advances in dentistry have occurred since I began practicing that allow for more efficient and effective care of our patients. Our practice is very involved in helping the underserved, and have been for many years. We see patients through Donated Dental Services and are able to do anything from simple restorations to full mouth extractions and fabrication of dental prostheses at no charge to the patient. We have also participated in several Doctors with a Heart Days that the York County Dental Society has sponsored over the years. This is a day(s) where you open your office to seeing patients at no charge. I, personally, have been on 4 separate dental missions trips to the countries of Burkina Faso and Gabon, West Africa where we literally saw hundreds of patients that live in remote areas of the country that have no access to dental care. If more offices would commit to helping those in need at a grassroots level, many of the underserved would receive needed care.

Please take the following considerations in your discussions:

<!--[if !supportLists]-->• <!--[endif]-->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.

<!--[if !supportLists]-->• <!--[endif]-->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.

<!--[if !supportLists]-->• <!--[endif]-->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,

Paul D. Kruth DMD, FAGD