

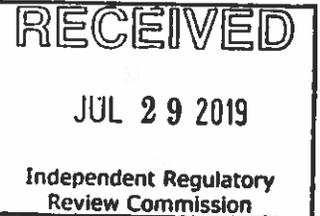


AMERICA'S PEDIATRIC DENTISTS
THE BIG AUTHORITY on little teeth®

May 3, 2019

delivered via e-mail

Ariel O'Malley, Board Counsel
Pennsylvania State Board of Dentistry
RA-STRegulatoryCounsel@pa.gov



Dear Board Counsel O'Malley:

We are writing on behalf of the American Academy of Pediatric Dentistry (AAPD)¹ to comment on a proposed Pennsylvania State Board of Dentistry regulation to allow public health dental hygienists to work in primary care physician offices (*Regulation #16A-4633: Public Health Dental Hygiene Practitioner Practice Sites.*)

As a matter of principle and in pursuit of optimal oral health for all children, the AAPD believes the Pennsylvania State Board of Dentistry was misguided in deciding in September, 2017 to move forward with this proposed regulation despite opposition from many in the dental community including the Pennsylvania Dental Association.

We understand that the proposed regulation "does not change the scope of practice of public dental hygiene practitioners and does not change the requirement that the practitioner refer each patient to a licensed dentist on an annual basis." We understand that the state dental board believes this expansion of practice sites will help more patients find a dental home.

However, the AAPD remains opposed to the proposed regulation regarding practice in primary care physician offices for several reasons. Under current AAPD policy we do not believe such an arrangement will promote a true dental

¹ The AAPD is the recognized authority on children's oral health. As advocates for children's oral health, the AAPD promotes evidence-based policies and clinical guidelines; educates and informs policymakers, parents and guardians, and other health care professionals; fosters research; and provides continuing professional education for pediatric dentists and general dentists who treat children. Founded in 1947, the AAPD is a not-for-profit professional membership association representing the specialty of pediatric dentistry. Our 10,500 members provide primary care and comprehensive dental specialty treatments for infants, children, adolescents and individuals with special health care needs.

Ariel O'Malley, Board Counsel
Page 2
May 3, 2019

home for children as described in this document:

http://www.aapd.org/media/Policies_Guidelines/P_WorkforceIssues1.pdf.

We also believe this proposed regulation is inconsistent with the American Academy of Pediatrics' policy on *Maintaining and Improving the Oral Health of Young Children* as described in this document:

<http://pediatrics.aappublications.org/content/134/6/1224>.

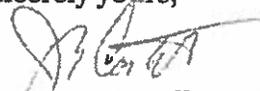
A dental hygienist should not serve a gatekeeper for referral to a dentist and subsequent dental care when hygienists are not trained for such a role. A dental hygienist cannot independently diagnose dental disease and develop a dental treatment plan. Further, a pediatrician is not trained to oversee a dental examination and development of a dental treatment plan.

As a practical matter, we would also point out that dental screenings and fluoride varnish treatments and referrals to a dentist that pediatrician offices are encouraged to provide can already be accomplished by the pediatrician, nurses or other pediatrician office staff. In other words, a pediatrician's office is perfectly capable of making a referral to a pediatric dentist without the need for a dental hygienist to be practicing in such office. Many pediatricians have ongoing and long-standing relations and communications with pediatric dentists in their community.

Ultimately, the AAPD is concerned that parents/guardians would receive a false sense of security by believing that since a dental hygienist had seen their child in a pediatrician's office, there would be no need to visit a dentist – even though the public health dental hygienist is supposed to document annual referral to a dentist. In our estimation, this proposal is inconsistent with the AAPD's goal of establishment of a dental home for all children by age one.

The AAPD appreciates the opportunity to comment on this proposed regulation. If you have any questions concerning our comments please contact C. Scott Litch, Chief Operating Officer and General Counsel, at 312-337-2169 ext. 29 or slitch@aapd.org.

Sincerely yours,


Joseph B. Castellano, DDS
President


John S. Rutkauskas, DDS, MBA, CAE.
Chief Executive Officer