3228

May 23, 2019

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

Dear Board Counsel O'Malley:

It was recently brought to my attention that the Pennsylvania State Board of Dentistry has proposed a regulation to allow public health dental hygienists to work in primary care physician offices. Hygienists play a key role in caring for our patients, but they cannot independently diagnose dental disease or construct a treatment plan.

It is also important to consider that dental screenings and fluoride varnish treatments are already practiced at many pediatrician offices and accomplished by the pediatrician, nurses or other pediatrician office staff. My concern is, parents may develop a false sense of security after seeing a hygienist at the dental office, and may in turn forgo a visit to a dental office for proper treatment.

I appreciate your time and consideration with this matter.

Sincerely,

Danielle Trott DMD

RECEIVED

JUL 29 2019

Independent Regulatory Review Commission