



December 10, 2020

Ms. Jackie Wiest Lutz, Assistant Counsel
Department of State
P.O. Box 69523
Harrisburg, PA 17106-9523

Re: Regulation No. 16A-4634 (Fees)

Dear Ms. Lutz:

On behalf of the more than 5,200 members of the Pennsylvania Dental Association (PDA), I thank you for the opportunity to comment on proposed rulemaking increasing licensing and permit application fees for individuals who are licensed or certified by the State Board of Dentistry (SBOD). While we appreciate the need for the SBOD to forecast expenditures and budget prudently, PDA respectfully, but strongly, urges the SBOD to reconsider increasing fees at a time when many dentists and their teams are dealing with significant financial hardships due to the COVID-19 pandemic.

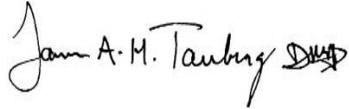
Please consider the acute situation that many dentists and their staff are now facing:

- According to the latest data from the American Dental Association's Health Policy Institute (HPI), it took until mid-June for patient volume in the majority of dental practices to bounce back to 75 percent of pre-COVID levels following the shutdown and emergent-care-only orders in spring. And even now, compared to pre-COVID levels, patient volume in dental practices is estimated at 76 percent, and collections in more than half of all PA dental practices is below 85 percent. Some patients remain reticent to seek medical and dental care until a vaccine is readily available to the public. Additionally, with having to follow current guidelines from the Centers for Disease Control and Prevision (CDC) on mitigating exposure and transmission of COVID-19, dentists are not able to schedule as many patients as usual. HPI finds that if patient volume remains stagnant to the end of the year, one third of dentists age 65 or older will consider selling their practice and 40 percent will consider retiring.
- HPI found that staffing in dental offices is at 90 percent of pre-pandemic levels. That leaves a significant number of dental team members who are unemployed and will have difficulty paying higher renewal fees to maintain their licenses, certificates and permits and find work. Dental service organizations in particular report having to downsize their dental team.
- HPI data indicates that many dentists will have to consider borrowing from a bank or raising fees to maintain the financial sustainability of their practice. The latter will ultimately impact patients and their ability to afford the increased costs of dental care. We know that the SBOD takes seriously its charge to protect the public's safety and well-being, and we share your concern that patients' well-being may be negatively impacted if they cannot afford dental care.
- Dental practices are absorbing exorbitant costs for personal protection equipment (PPE). The average cost of PPE for a dentist and assistant is \$24-28 per patient, per visit. More than a third of dentists report that PPE expenses have at least tripled since the outbreak of COVID-19. These expenses will likely rise as dental suppliers struggle to meet demand during the second wave that we are now experiencing.

PDA asks that you consider the needs of the dental community at this critical juncture and delay implementing fee increases until after dentistry recovers from the devastating impact of COVID-19 and resumes practicing at pre-pandemic levels. At a minimum, we question the need for the SBOD to proceed with a plan that results in a positive balance in excess of \$655,500 in FY 2025-2026, and we urge the SBOD not to raise fees as high as 18 percent for the renewal period beginning on April 1, 2021.

Thank you for your consideration. I can be reached at (412) 244-9044 or taubergdmd@gmail.com. You may also contact Marisa Swarney, PDA's director of government relations, at (717) 234-5941 or mss@padental.org.

Sincerely,

A handwritten signature in black ink that reads "James A. H. Tauberg DMD". The signature is written in a cursive style with a large initial 'J' and a distinct 'DMD' at the end.

James A. H. Tauberg, DMD
President