

NEVADA STATE BOARD
of
DENTAL EXAMINERS



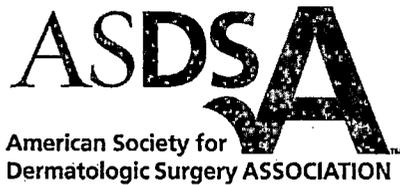
NOTICE OF INTENT TO ACT UPON
PERMANENT REGULATIONS —
BOARD MEETING

SEPTEMBER 23, 2016

9:00 A.M.

ADDITIONAL ITEMS

PUBLIC BOOK



September 19, 2016

Nevada State Board of Dental Examiners
6010 S. Rainbow Blvd.
Las Vegas, Nevada 89118

Re: Opposition to LCB File No. R086-16

Dear Honorable Members of the Board:

On behalf of the American Society for Dermatologic Surgery Association (ASDSA), a surgical specialty organization representing over 6,100 physician members, I am writing to express our opposition to the Board of Dental Examiner's proposed regulation which would allow dentists and dental hygienists to administer botulinum toxin, dermal fillers and other facial injectables with only minimal amounts of additional training. Allowing these serious medical procedures to be performed by undertrained personnel will severely jeopardize patient safety in Nevada.

ASDSA acknowledges the ability and training of dental professionals in diagnosing and treating diseases, injuries and malformations of the teeth and mouth. However, just as dermatologic surgeons would not presume to have adequate training in dentistry to perform root canals or to treat tooth decay, we do not believe that dentists or dental hygienists have adequate training in performing systemic examinations of patients to assess their eligibility for surgical procedures outside of the oral cavity.

As proposed, dental hygienists would be authorized to administer facial injectables if the administration is within the scope of education, experience and training of the dental hygienist. ASDSA maintains that the medical treatment of any condition of the skin or other structures outside of the oral cavity is beyond the scope of dental training and practice. Dental training does not involve the majority of facial anatomical areas in which botulinum toxin and dermal fillers are injected.

Further, the proposal to require only 24 hours of additional training to perform these surgical procedures is inadequate for identifying patients who are good candidates for facial injections or to respond to any possible complications. An examination by a properly trained physician is necessary prior to the administration of neurotoxins, such as botulinum toxin, and dermal fillers to ensure that the course of treatment is appropriate for each patient. If a patient's complete medical history is not reviewed, the possibility for adverse events is substantially greater. For example, if there is a possibility of neuromuscular disease (such as myasthenia gravis) that goes unnoticed, the patient could wind up on a respirator or even die.



Even when patients have been carefully evaluated by a physician, serious complications which require medical intervention can occur. Adverse events from these types of procedures could include numbness, paresthesia, palsy, vascular occlusion and subsequent tissue necrosis, anaphylactic shock, urticaria, angioedema, nodule formation, granulation, hematoma, blanching and discoloration, ischemia, permanent vision impairment, blindness and stroke. Surgical intervention including, but not limited to, the opening of an abscess, excision of nodules or biopsy of lesions could be necessary.

In contrast to this minimal amount of additional training that is required, dermatologic surgeons must complete a comprehensive medical education which focuses on developing the skills necessary for differential diagnosis of the physiological, neurological, organ systems, and other all other systems in the human body. Upon receiving their medical degree, prospective dermatologic surgeons complete years of residency training with increasing levels of difficulty and surgical training throughout the course of the program. Throughout their training, a resident is closely supervised by an attending physician to ensure patient safety throughout the continuum of care.

Due to the clear difference in medical and dental education and training received as well as the strong desire to protect patient safety in Nevada, ASDSA strongly recommends that the Dental Board of Examiners does not authorize dental hygienists to perform any procedures which involve botulinum toxin, dermal fillers or other facial injectables. We appreciate the opportunity to provide comment. Should you have any questions or need further information, please feel free to contact Jake Johnson, Manager of Advocacy and Practice Affairs, at (847) 956-9145 or jjohnson@asds.net.

Sincerely,

A handwritten signature in black ink, appearing to read "Naomi Lawrence". The signature is fluid and cursive, with a large initial "N" and "L".

Naomi Lawrence, MD, President
American Society for Dermatologic Surgery Association

cc: Thomas E. Rohrer, MD, President-Elect
Lisa M. Donofrio, MD, Vice President
Mathew M. Avram, MD, JD, Treasurer
Murad Alam, MD, MBA, Secretary
George J. Hruza, MD, MBA, Immediate Past President
Katherine J. Duerdoth, CAE, Executive Director
Kristin A. Hellquist, MS, CAE, Director of Advocacy and Practice Affairs