



February 20, 2015

Senator Mary Pilcher-Cook, Chair
Senate Standing Committee on Public Health and Welfare
Kansas State Capitol
300 SW 10th St. Room 441-E
Topeka, Kansas 66612

RE: Oppose SB 49

Dear Senator Pilcher-Cook and Members of the Committee:

On behalf of the 39,000 members of the Academy of General Dentistry (AGD) and the 227 members of the Kansas AGD, we are writing to express our opposition to Senate Bill 49 which would create the position of a licensed dental practitioner who is not a dentist. Our opposition to the bill is based upon two grounds.

First, the bill authorizes a licensed dental practitioner to practice under “general supervision,” defined as excluding “the presence of the dentist in the office or on the premises at the time the tasks or procedures are being performed, and pursuant to a written supervising agreement.” We believe that the absence of the dentist during the procedure is not in the best interest of the patient. A careful reading of the bill highlights the same concern. It says that the supervising agreement should outline “a course of action when the registered dental practitioner encounters a patient who requires treatment that exceeds the authorized scope of practice of the registered dental practitioner.” Further, it states that the supervising dentist should provide or arrange for a dentist to provide this treatment if the need arises. However, in dentistry, advanced procedures may be unplanned, becoming necessary when a practitioner encounters a complication during a simpler procedure. When this occurs, time is of the essence, and waiting for an offsite dentist may endanger the patient. For this reason, AGD policy requires direct or indirect supervision by a dentist, and not merely the general supervision allowed in SB 49.

Second, the bill authorizes the licensed dental practitioner to diagnose oral disease, formulate an individualized treatment plan and perform a number of irreversible surgical procedures, including extractions. Competency achieved through graduate dental education toward a DDS or DMD degree must set the floor, and not the ceiling, for the practice of dentistry, including the procedures outlined above. Eighteen months of dental practitioner education does not meet the standard to ensure proper diagnosis, treatment planning or safe performance of irreversible surgical procedures.

The AGD and Kansas AGD support the use of directly or indirectly supervised expanded function auxiliaries to address barriers to oral health care. Additionally, patient safety is protected through the application of appropriate educational standards for all such auxiliaries as

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promulgated by the Board of Dentistry. As professionals dedicated to the public's oral health, we believe that patient needs for better oral health, for quality care and for treatment must be provided by individuals sufficiently educated to provide proper care. A dental practitioner as defined in this legislation does not possess that education. Accordingly, we urge you to **oppose SB 49** when it comes to a vote in the Senate Committee on Public Health and Welfare.

The AGD and Kansas AGD believe that our core principles and values are in the best interests of our patients. We stand ready to work with anyone seeking to enable dentistry to expand its reach as the beacon for patient-first preventive health care in the United States. We would welcome the opportunity to work with you and the committee to ensure the optimal outcomes of improved access to care for the entire population, served by exceptionally well trained dentists and auxiliaries.

Sincerely,

W. Carter Brown, DMD, FAGD
President
Academy of General Dentistry

Gregory J. Kilbane, DDS, FAGD
President
Kansas Academy of General Dentistry

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