



AMERICAN ACADEMY of
DERMATOLOGY | ASSOCIATION



February 8, 2019

The Honorable Jonathan Steinberg
Connecticut Joint Committee on Public Health
300 Capitol Avenue, Room 3000
Hartford, CT 06106
Submitted electronically: Jonathan.Steinberg@cga.ct.gov

Re: Oppose HB 5654: An Act allowing dentists to perform certain facial therapies as part of their dental practice

Dear Chairman Steinberg and Members of the Joint Committee on Public Health:

On behalf of the undersigned physician organizations, we are writing to urge you to oppose HB 5654, which would allow dentists to perform facial therapies, including the administration of neurotoxins and dermal fillers as part of their practice. We believe these procedures are outside the scope of practice of dentists and are a risk to patient safety. The addition of these procedures also necessitates different training and education requirements, which will likely result in inconsistent standards for the same procedures performed by other practitioners. For these reasons, we urge you oppose this bill.

Procedures by any means, methods, devices or instruments that can alter or cause biologic change or damage the skin and subcutaneous tissue constitute the practice of medicine and surgery. This includes the use of foreign or natural substances by injection or insertion.^{1,2} Our organizations believe that procedures using a Food and Drug Administration (FDA)-regulated device, such as those that can alter or cause biologic change or damage, should only be performed by a physician or appropriately trained non-physician personnel under the direct, onsite supervision of an appropriately trained physician.³ This rule jeopardizes patient safety and disregards what is considered adequate and appropriate medical education and training. Quality patient care includes evaluating a patient's needs and condition(s), selecting an appropriate course of treatment and providing adequate follow-up care.

According to the American Dental Association, three or more years of undergraduate education plus four years of dental school is required to graduate and become a general dentist.⁴ The focus of their education is oral health rather than skin and facial tissue. Dentists are not required to demonstrate competency in procedures involving skin and soft tissue augmentation with products that can alter or damage living tissue. It is of utmost importance that the health care provider performing procedures with neurotoxins (such as botulinum toxin) or dermal fillers have specific, long-term training (such as a medical residency in plastic, facial or dermatologic surgery). The education for dentists does not include this type of intense training; additionally, any short-term training program offered by manufacturers of these products does not adequately protect patient safety.

An analysis by the FDA's General and Plastic Surgery Devices Panel of six years of adverse event reports associated with the use of injectable dermal fillers concluded the following: there are a number of adverse events that are serious and unexpected, such as facial, lip and eye palsy, disfigurement, retinal vascular occlusion, blindness, as well as rare but life-threatening events such as severe allergic reactions and anaphylactic shock.

- Some of the common adverse events that are expected to occur shortly after injection and resolve quickly can have a delayed onset and/or remain for a long period of time and turn into more serious problems.
- A number of the adverse events reported to the FDA and the device manufacturers imply that, in these cases, the administration of injectables were performed by untrained personnel or in settings other than health clinics or doctors' offices.⁵

A survey conducted by the Physicians Coalition for Injectable Safety found that 84 percent of physician respondents had seen at least one patient with complications from cosmetic injectables and 38 percent had seen complications arising from cosmetic injections administered by an unqualified or untrained provider.⁶ Injectable fillers that are approved for injection in the dermis or mid-to-deep dermis require extensive knowledge of facial anatomy to ensure proper placement of the injections. Understanding which injectable product is appropriate for each anatomic site and its particular limitations is fundamental to avoiding adverse effects. Furthermore, in discussing these devices, the FDA's Consumer Health Information materials suggest that patients should discuss fillers with a doctor who can refer the patient to a specialist in the field of dermatology or aesthetic plastic surgery.⁷

In order to protect the citizens of Connecticut from adverse events and ensure quality patient care, **we urge you to oppose HB 5654**. Dentists do not have the comprehensive education and training that is required to identify and respond to potential complications resulting from the administration of these devices. We appreciate the opportunity to provide comments on this issue; for further information, please contact Emily Ninnemann, ASDSA Manager of Advocacy and Practice Affairs, at 847-956-9121 or eninnemann@asds.net.

Sincerely,
 American Academy of Dermatology Association
 American Academy of Facial Plastic and Reconstructive Surgery
 American Society for Dermatologic Surgery Association
 American Society of Plastic Surgeons

¹ ASDSA *Position Statement on the Practice of Medicine*. <http://asdsa.asds.net/uploadedFiles/ASDSA/Polymakers/ASDSA-Definition%20of%20the%20Practice%20of%20Medicine.pdf>

² AADA *Position Statement on Medical Spa Standards of Practice*. <https://www.aad.org/Forms/Policies/Uploads/PS/PS-Medical%20Spa%20Standards%20of%20Practice.pdf>

³ ASDSA *Position Statement on Delegation*. [http://asdsa.asds.net/uploadedFiles/ASDSA/Polymakers/ASDSA-%20Delegation%20Position%20Statement\(4\).pdf](http://asdsa.asds.net/uploadedFiles/ASDSA/Polymakers/ASDSA-%20Delegation%20Position%20Statement(4).pdf)

⁴ General Dentistry. Retrieved from <http://www.ada.org/en/education-careers/careers-in-dentistry/general-dentistry>.

⁵ FDA General and Plastic Surgery Devices Panel. Dermal Filler Devices. November 11, 2008. Retrieved from <https://www.fda.gov/ohrms/dockets/ac/08/briefing/2008-4391b1-01%20-%20FDA%20Executive%20Summary%20Dermal%20Fillers.pdf>

⁶ New Data Finds Greater Measures Needed For Consumer Safety And Education On Injectable Therapies. August 15 2007. Retrieved from https://www.aafprs.org/media/press_release/150807.htm

⁷ Filling in Wrinkles Safely. Retrieved from <https://www.fda.gov/ForConsumers/ConsumerUpdates/ucm049349.htm>