

Sara Montauti, MPH.

Healthcare Quality and Safety Branch

Practitioner Licensing and Investigations

Department of Public Health

410 Capitol Avenue, MS# 12HSR P.O. Box 340308

Hartford, CT 06134

Phone: (860) 509-7307

Dear Ms. Montauti,

On behalf of Connecticut's dentists, their practice teams, and patients, the Connecticut State Dental Association (CSDA) is formally submitting the attached letter to request a change in the scope of practice. The requested change seeks to allow dentists to administer botulinum neurotoxin (such as Botox, Xeomin, Dysport), dermal fillers (such as Juvederm, Restylane, Sculptra), and similar injectables for the functional or cosmetic enhancement of the gums, cheeks, jaws, lips, oral cavity, and associated structures of the maxillofacial areas.

For all future correspondence regarding the submission, please contact:

Kathlene Gerrity

Executive Director, Connecticut State Dental Association

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Thank you.

Chris Matta.



## Connecticut State Dental Association

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Department of Public Health  
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Dear Ms. Montauti,

### **1. A plain language description of the request**

This submission is to permit Connecticut Licensed Dentists to administer botulinum neurotoxin, dermal fillers and similar injectables for the functional or cosmetic enhancement of the gums, cheeks, jaws, lips, oral cavity, and associated structures of the maxillofacial areas.

### **2. Public health and safety benefits**

Currently, dentists and Oral and Maxillofacial Surgeons perform procedures within the maxillofacial region under their existing licenses. Some of these surgeries are extremely complex, such as facial reconstruction after trauma or orthognathic surgery, intentional fracturing and repositioning of the jaws and facial bones. The existing Scope of practice in Connecticut does not allow the administration of neurotoxin, dermal fillers, and similar injectables cosmetic procedures be dentists. This is an inappropriate limitation on the scope of practice, which diminishes the patient-provider relationship; providing these injections should be included without a distinction between pain management or cosmetic care, allowing dentists to fully utilize their expertise in facial anatomy to enhance patient outcomes.

The administration of neurotoxins, dermal fillers, and similar injectable cosmetic procedures should not be exclusively limited to MD and DO physicians. Dentists are particularly adept at performing injections in the head and neck region, safely and frequently navigating vital structures in the regular course of their administration of oral health care treatments. Adapting these skills we already use to the indicated cosmetic



dermal fillers, for cosmetic purposes as shown in the map below.

**4. Proposed education, training, and examination requirements and any relevant certification requirements applicable to the profession**

To ensure the highest standards of care and safety, it will be mandated that dentists must either have completed a CODA (Commission on Dental Accreditation) approved program or have undergone specific training provided by the Connecticut State Dental Association (CSDA) to be authorized to perform the procedure.

**5. A summary of known scope of practice changes requested or enacted concerning the profession in the five years preceding the request:**

On this matter the CSDA requested scope of practice changes in both 2019 and 2023. In 2019 was the Denta Therapy Scope of Practice enacted to authorize Dental Therapists in CT.

**6. The extent to which the request directly affects existing relationships within the health care delivery system.**

Expanding the scope of practice to allow dentists to administer botulinum neurotoxin (Botox, Xeomin, Dysport) and dermal fillers will positively impact existing healthcare relationships by leveraging the trust patients already have with their dentists, enabling them to receive a broader range of treatments from a familiar and trusted provider.

Patients feel comfortable and secure with their regular dental professionals, which can ease anxiety about procedures. This trust, combined with the dentists' expertise in the maxillofacial region, ensures safe and effective treatment, enhancing patient care and satisfaction while fostering a more cohesive healthcare experience. There are also no reported malpractice cases in the states that allow dentists to perform these cosmetics procedures.

**7. The anticipated economic impact of the request on the health care delivery system.**

The anticipated economic impact of this scope change will be threefold:

1. Increased Revenue for Dental Practices:
  - a. Expanded Services: Allowing dentists to administer botulinum neurotoxin and dermal fillers provides an additional revenue stream, helping small and independent practices remain financially viable.
  - b. Broader Patient Base: By offering these cosmetic procedures, dental practices can attract a wider range of patients, increasing overall practice income.

2. Improved Patient Convenience and Satisfaction:
  - a. Comprehensive Care: Patients can receive both dental and cosmetic treatments from their trusted dentists, enhancing convenience and reducing the need for multiple healthcare visits.
  - b. Increased Satisfaction: Trusting a single provider for multiple services improves patient satisfaction, loyalty, and retention, as patients appreciate the ease and reliability of receiving comprehensive care in one place.
3. Oral Healthcare in Connecticut contributing an annual 6.5 billion economic impact, supporting almost 29,000 jobs. Every dental office job guarantees an additional 1.4 jobs in the other economic sectors in our state

**8. Regional and national trends in licensing of the health profession making the request, and a summary of relevant scope of practice provisions enacted in other states.**

Recently, the Alabama Board of Dental Examiners decided that dentists in the state can continue administering botulinum neurotoxin (Botox, Xeomin, Dysport) and dermal fillers. Additionally, several states have expanded the scope of practice for dentists to include these cosmetic procedures. Arizona passed legislation in 2022, California confirmed this practice in the same year, and Nevada joined in 2023, recognizing dentists' expertise in the maxillofacial region and ensuring comprehensive training for patient safety.

In Michigan, the Michigan Dental Association plans to form a workgroup to develop a policy recommendation and consider legislation to allow dentists with appropriate training to administer Botox and dermal fillers for both therapeutic and cosmetic purposes, aligning with CODA training standards, as current Michigan laws lack specific language on cosmetic use by dentists.

**9. Identification of any health care professions that can reasonably be anticipated to be directly affected by the request, the nature of the impact, and efforts made by the requestor to discuss it with such health care professions.**

The proposed change will not significantly impact other health professions. Instead, it will empower patients by giving them greater flexibility to select the healthcare provider they feel most comfortable with for these specific procedures. This patient-centric approach fosters a more personalized and satisfactory healthcare experience.

**10. A description of how the request relates to the health care profession's ability to practice to the full extent of the profession's education and training**

Dentists undergo extensive training, including concentrated courses on the anatomy of the head and neck, comparable to or at times exceeding those of our medical colleagues.

Additionally, they receive specific training programs during dental school and residency training for the use of injectables and neurotoxins, following completion of these programs, continuing education programs such as those offered by the American Academy of Facial Esthetics (AAFE), the American Association of Oral and Maxillofacial Surgeons (AAOMS), and the American Dental Association (ADA) are available for dentists to maintain their skills.

CSDA is committed to providing ongoing continuing education courses, as well, to enable all dentists to maintain a high level of knowledge in the evolution of these procedures. Dentists are highly trained and capable of responding to complications arising from any procedures that they are performing, and these procedures are no different in that regard. Ensuring our patients' safety remains a top priority. There have been no negative outcomes for dentists performing these cosmetic injections throughout the US.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Hall". The signature is written in a cursive, flowing style.

Dr. Steve Hall, President 2024-2025