



Montana Dental Association

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October 22, 2019

Montana Legislative Services Division
Economic Affairs Interim Committee
State Capitol
P.O. Box 201706
Helena, MT 59620-1706

Dear Committee Members,

The Montana Dental Association has been monitoring the dispute over Rule J language (dentures over implants) for more than ten years, including its elevation to the Montana Supreme Court, who effectively ruled in favor of the Board of Dentistry in the matter. It is our understanding that the denturists entered into a legal settlement with the Department of Labor, which included replacing the language in Rule J. The Board of Dentistry selected the replacement language, and that replacement language is making its way through standard rule-making processes.

We believe the Department of Labor and the Board of Dentistry have acted properly and professionally in this matter and that due process is being followed. The denturists and dentists have had opportunities to voice their views on the replacement of Rule J in written and public testimony before the Board of Dentistry.

We have attached our letter to the Department of Labor dated November 9, 2017, which illustrates the complexity and importance of this rule. It is our hope it will continue through the rule-making process.

Sincerely,

Dr. Ron Jarvis, DDS
President