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GOOD LUCK!

Montana Department of Labor and Industry
Attn: Board of Dentistry
301 South Park
Helena, Montana 59601

Re: Public Comment on Proposed "New Rule II" from MAR Notice 24-138-76 Restricting the Fitting of Dentures On or Over Implants by Denturists

Dear Members of the Board:

I am a Montanan and receive denture services from a denturist licensed to practice in the State of Montana. My denturist is ALLEN CASTEEL. I chose him because of the high quality of care he provides and the reasonable prices he charges for his services. I also have a good relationship with my dentist and believe that together my denturist and dentist provide me the best services at the best price and are better postured than the Board of Dentistry to make a decision as to whether supervision or a referral process which allows both professional to work in their regular place of business is best for my health.

If a dentist has developed confidence in a certain denturist, the dentist should not be unreasonably required to provide direct supervision over each subsequent fitting. Denturists work in professional labs, dentists in their offices. On-premise supervision imposes additional costs and constrains the ability of dentists, patients, and denturists to make the best decision on a case-by-case basis.

Accordingly, I oppose the proposed "New Rule II" published in MAR Notice 24-138-76. I believe that a referral from a dentist prior to a denturist fitting a denture on or over an implant is a less intrusive, less expensive, and more reasonable requirement. If my dentist is comfortable providing a referral for an implant-retained denture to a specific denturist without providing direct supervision of the fitting procedure why should my denturist or I incur the additional cost necessary to pay for a dentist's time/travel to provide such direct supervision or require that my denturist provide the fitting away from his professional lab and worksite?

A dentist would of course be free to condition her referral to a denturist on direct supervising during a fitting. But the Board of Dentistry should not force such a cost and inconvenience if my personal dentist does not believe it will improve my care.

I submit this letter to ask the Board of Dentistry to respect the integrity of my relationship with my dentist and denturist and not force a direct supervision requirement on denturists fitting dentures on or over implants when a referral, tailored on a case-by-case by a patient's personal dentist, is the optimal way to protect public safety and to limit additional costs to only those situations where a patient's dentist believes it necessary.

Sincerely,



Signature

JACK P. MAY 1200 32ND ST So #67 GREAT FALLS, MT 59405
Print Name & Address

Date: 9-28-2019

Montana Board of Dentistry
Rules Committee
301 South Park
Helena, Montana 59601

RE: Public Comment on Proposed "New Rule II" from MAR Notice 24-138-76 Restricting
the Fitting of Dentures On or Over Implants by Denturists

Dear Members of the Board:

The undersigned professionals licensed by the Montana Board of Dentistry ("the Board") do hereby submit this comment in opposition to the proposed "New Rule II" from MAR Notice 24-138-76.

It is my opinion, as a licensed dentist, that the best way to ensure a patient is properly care for is to allow individual dentists and patients to determine on a case-by-case basis what the best way is to incorporate the services of a denturist into the patient's care plan. So long as a dentist or oral surgeon provides an initial referral prior to the fitting of a new denture over implants, a patient's health and safety will be protected. A dentist could choose to condition a referral on direct supervision, or decide that the patient is best served by both professional providing their respective services in their own professional workspaces. An examination by a dentist prior to the fabrication of a new denture allows for a team-based approach that ensures a dentist can diagnose any oral pathology and put in place a treatment protocol for any such pathologies. A referral prior to fitting a new denture will allow a dentist to conduct an evaluation to determine that the implants, abutments, and surrounding structures are in sufficient condition to proceed with fabricating new dentures.

This pre-fitting referral will ensure that no harm will be caused by the force and loading typically entailed in fitting a denture over implants.

The proposed "New Rule II" takes away the ability of a treating dentist or oral surgeon to make the best choice for implant patients, and constitutes an unnecessary invasion of the dentist-patient relationship. A pre-fitting referral rule for new implant patients would provide patients with the choice to seek the skill of denturists in fitting and fabricating their denture in their own professional lab, while also ensuring that the special skill, education, and training of dentists will be incorporated so as to protect health and safety.

I respectfully ask that the Board consider this comment and reject the unduly restrictive and invasive "New Rule II". Dentists and Denturists form a highly skilled team, and implant patients should not be denied the opportunity to choose such a team where an initial examination by a dentist will ensure that their health and safety are protected.

Sincerely,



Signature,

Date: 26 Sep 19

Adam Huhn, DDS
(printed name & address)

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