

September 27, 2019

Board of Dentistry
301 South Park Avenue
P.O. Box 200513
Helena, MT 59620-0513

RE: Amendments and adoption of new rules

Dear Board of Dentistry,

I commend you for undertaking this difficult task of updating rules and regulations. I have read through the proposed changes and there are two items that I think could be improved.

24.138.512 DENTURIST INTERNSHIP

(1) Denturist applicants must complete a clinical internship of at least one year, but no more than two years, under the direct supervision of a licensed denturist.

I would suggest that you add to this the following: ...under the direct supervision of a licensed denturist and/or a licensed dentist. This is consistent with other states that have internships.

The board has acknowledged that with Montana being a large state with few denturists doing an internship with a denturist might be difficult. I would add to this that most of the denturists have been in practice for several years and may be slowing down in their practices. They may not generate a sufficient volume of patients to keep an intern busy. Also, there are several areas of the intern's education that may be enhanced by working with a dentist, including oral examination, care of the denture patient following placement of an immediate denture, evaluation of teeth for partial denture design and fabrication of implant retained overdentures. Also, the interns need practical experience with digital work flow including intraoral scanners, design software and 3D printers for fabrication of dentures. The denturist intern will be working with dentists throughout his or her professional life so it could be beneficial to develop those relationships during this internship year. As a side benefit, this will provide Montana residents with an educational experience in Montana and help them stay in Montana and it won't cost the taxpayers anything.



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NEW RULE II DENTURIST SCOPE OF PRACTICE – DENTURES OVER IMPLANTS
(1) It is within the scope of practice of a denturist to fit dentures over implants under the following conditions:

(a) the fitting must be performed under the direct supervision of a Montana-licensed dentist;

(2) "Direct supervision" means treatment by a licensed denturist provided with the intent and knowledge of a licensed dentist and while the dentist is on the premises.

I am in support of denturists having the scope of their practice expanded to include fabrication of overdentures, but the rule requiring direct supervision is not workable. The reason given to justify the need for direct supervision is given in the following statement:

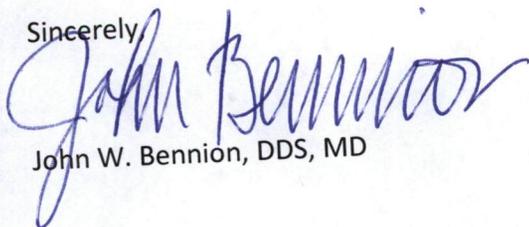
Because of the unacceptably high risk of damage to teeth and jaws from the pressure of fitting dentures, the board concluded that safe practice requires a denturist's fitting of dentures over implants be overseen by a dentist on the premises and available as needed.

I would argue against the rule requiring direct supervision for the following four reasons:

1. The reason above that mentions the "unacceptably high risk of damage" is completely false. I have done thousands of implants and hundreds of overdentures and I cannot conceive of a situation where the process placing overdenture attachments in a denture could cause "damage to the teeth and jaws".
2. It is impractical to expect a denturist to have a dentist on premises for this procedure. I know of at least one denturist who practices in a small town with the closest dentist over 30 miles away.
3. The "fitting" of the denture has nothing to do with the implants and is a process that the denturists have done for years. The final step of securing the attachments in the denture has virtually no risk.

Thank you for your careful consideration of these issues and thank you for your service to the people of Montana.

Sincerely



John W. Bennion, DDS, MD