



MEMORANDUM IN OPPOSITION

S2824 (Gounardes)

Higher Education Committee

An act to amend the education law, in relation to the practice of dentistry

On behalf of the New York State Society of Plastic Surgeons (NYSSPS), we express **strong opposition** to **S2824**. This bill would permit all dental practitioners to perform a wide range of medical and surgical procedures within the oral maxillofacial area.

Concerns

NYSSPS acknowledges that non-physician providers play an important role in the delivery of health care services. Allowing limited license providers to become medical doctors by legislative fiat runs counter to federal and state policies that promote physician led, team-based health care.

The current practice of dentistry is defined as diagnosing, treating, operating, or prescribing for any disease, pain, injury, deformity, or physical condition of the oral and maxillofacial area relating to restoring and maintaining dental health. By removing the language, “restoring and maintaining dental health” the bill permits dental practitioners to perform a wide range of medical and surgical procedures incongruent with dental training and practice including but not limited to rhinoplasty (nose jobs), blepharoplasty (eyelid surgery), rhytidectomy (face lift), submental liposuction, otoplasty (ear surgery), dermabrasion, and other procedures of the head and neck performed by plastic surgeons, otolaryngologists, ophthalmologists and neurosurgeons.

While single-degree dentists (DDS) have extensive training in the area of oral health, their formal training does not include the 5-8 years of clinical surgical for MD surgical specialists. DDS graduate training is limited to oral health, not management of total patient in comparison to MDs who spend 24 months devoted to learning diagnosis and management of the total patient. Dentists are not trained in the systemic management of disease and, therefore, are not prepared to conduct a proper pre-operative evaluation, assess what surgical approach is most appropriate, or determine how to manage complications which may arise.

This type of expansion dangerously comprises patient safety and quality of care. Patients deserve the highest standard of medical care reflecting the best education, training and experience available, without compromise.

Solution

Many non-physician health care providers are seeking ways to provide increasingly popular elective surgical services, but these shortcuts expose patients to unnecessary risk and potentially hazardous outcomes. This is not an issue of necessity or convenience and patient care for the citizens of New York should not be compromised.

Policy should explore and implement measures that help ensure an adequate distribution of physicians in all communities and focus on attracting and retaining new physicians throughout the state.

Respectfully Submitted,
Babette M. Grey, Executive Director