

June 3, 2024



W. Blake Strickland,
Executive Director
Board of Dental Examiners of Alabama
2229 Rocky Ridge Road
Birmingham, AL 35216

Dear Executive Director Strickland:

On behalf of the Alabama Academy of General Dentistry I am writing to express our concerns about proposed Administrative Code 270-X-2-.25 on the use of botulinum toxins (e.g. Botox) and dermal fillers by dentists to treat their patients.

We appreciate the changes to the original proposed rule, specifically the inclusion of the neck in the areas that dentists may use Botox in the treatment of our patients. We were also pleased that the exception for one specialty in the original proposed rule has been removed. The Alabama AGD believes that all properly trained dentists are capable of providing any treatment for which they have been trained.

However, we believe that the revised draft does not put forth policies that will provide the best access and quality of care to Alabamians.

Alabama AGD believes that the Board Opinion Letter stating that: "Dentists are allowed to use cosmetic injectables and topicals in any area of the face to treat maxillofacial trauma, and for the treatment of diagnosed dental and orofacial problems/pain and conditions and for cosmetic purposes following proper continuing education and certification such as is offered by national industry associations or other dental continuing education" is the correct policy and that this proposed Rule does not codify this opinion.

It is unclear whether Section 3 addresses only cosmetic use of Botox and other injectables or both therapeutic and cosmetic use. Alabama AGD believes that well-trained providers should be able to provide therapeutic and cosmetic care via the use of Botox and other similar treatments. We believe that the Opinion Letter is clearer and better provides for access to care.

The Academy of General Dentistry was founded to provide the highest quality continuing education to general dentists in the United States and Canada. Alabama AGD is in favor of dentists achieving excellence through extensive continuing education but not necessarily requiring a specifically defined number of hours for a procedure as is outlined in the proposed rule.

The AGD believes that a well-trained general dentist can provide care that is defined to be within the scope of practice of a dentist in any appropriate practice type or practice modality.

Thank you,

Gary Myers, DMD, MAGD
Executive Director, Alabama Academy of General Dentistry