



American Association of Oral and Maxillofacial Surgeons

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AAOMS.org

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VIA EMAIL: dental.board@state.mn.us & Bridgett.Anderson@state.mn.us

January 5, 2026

Heidi Donnelly, LDA
President
Minnesota Board of Dentistry
335 Randolph Ave., Suite 250
St. Paul, MN 55102

Bridgett Anderson, LDA, MBA
Executive Director
Minnesota Board of Dentistry
335 Randolph Ave., Suite 250
St. Paul, MN 55102

Dear Mses. Donnelly and Anderson:

On behalf of the 134 members of the American Association of Oral and Maxillofacial Surgeons (AAOMS) practicing in Minnesota, AAOMS strongly opposes the scope of practice expansion proposed for dental therapists currently under discussion by the state dental board.

Oral and maxillofacial surgeons (OMSs) are surgically and medically trained dental specialists who treat conditions, defects, injuries and esthetic aspects of the mouth, teeth, jaws, neck and face. OMSs have extensive surgical training and experience in diagnosing and extracting teeth, but also treat and diagnose a variety of dento-maxillofacial diseases and conditions, including but not limited to, planning and evaluation for dental implants, craniofacial asymmetry, orthodontic treatment, impacted teeth, intraosseous cysts or tumors, dental and skeletal trauma and temporomandibular joint disorder. After earning a dental degree from an accredited four-year dental school, OMSs complete a minimum of four years of hospital-based oral and maxillofacial surgery residency training, which includes rotations in such areas as general surgery, anesthesia and clinical research.

Proposed changes to 150A.105 would authorize dental therapists to place sutures. The necessity of this scope expansion is questioned, given that dental therapists are limited to performing "nonsurgical extractions of primary teeth." Suture placement is a surgical procedure requiring appropriate clinical judgment, technique and training. Improper decision making or execution can result in irreversible harm, including wound dehiscence, tissue necrosis or delayed healing. Additional adverse outcomes may include inflammation, trauma and abscess formation resulting from improper placement.

Surgical services inherently involve unpredictable and intraoperative challenges. Procedures that may appear routine preoperatively can prove complex due to significant variation in human dental and maxillofacial anatomy. Even with advanced training, diagnosis can be challenging and postoperative complications may arise despite appropriate preoperative planning. Prompt recognition and management of these complications is critical to minimizing patient harm. Consistently achieving positive outcomes requires advanced education and surgical training that can only be attained through completion of an appropriate doctoral-level degree.

It is the position of the American Association of Oral and Maxillofacial Surgeons (AAOMS) that the diagnosis and performance of irreversible procedures should be limited to practitioners who have earned a Doctor of Dental Surgery (DDS), Doctor of Dental Medicine (DMD) or equivalent degree, or a Doctor of Medicine (MD) where permitted by law.

In addition, AAOMS and the Minnesota Society of OMS request additional time for discussion regarding any expansion of dental therapy services. Much of the deliberation on this issue has not occurred in a public forum and this proceeding represents the first opportunity for stakeholder input. Because these changes would require legislative approval, further deliberation is requested prior to a final Board vote to ensure that any proposal advanced to the legislature reflects a transparent, consensus-driven process consistent with established dental board practices and procedures.

We thank you for the opportunity to comment. Should you have any questions or require further information, please contact Sandy Guenther, Director of State Government Affairs, at 800-822-6637, ext. 4388, or sguenther@aaoms.org

Sincerely,

A handwritten signature in black ink that reads "Robert S. Clark, DMD". The signature is fluid and cursive, with the initials "R.S." and "DMD" clearly visible.

Robert S. Clark, DMD
President

CC: Daniel E. Sampson, DDS, MD, President, Minnesota Society of OMS
Peter McKown, Executive Director, Minnesota Society of OMS
Julia R. Plevnia, DDS, FACD, FACS, District V Trustee, AAOMS
Karin K. Wittich, CAE, Executive Director, AAOMS
Srini Varadarajan, JD, Associate Executive Director, Practice Management, Health Policy and Governmental Affairs, AAOMS
Dan Murphy, Director of Government Affairs, Minnesota Dental Association