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January 8, 2026

Minnesota Board of Dentistry
335 Randolph Avenue, Suite 250
St. Paul, MN 55102

Re: Policy Committee Proposed Changes to MN Statute Sec. 150A.105(4)(c)

Members of the Board:

The Academy of General Dentistry and the Minnesota Academy of General Dentistry submit this comment to express concerns over proposed changes that the board is considering recommending to Minnesota Statute Section 150A.105(4)(c) that would expand the scope of practice of licensed dental therapists in Minnesota.

The AGD has serious concerns about the proposed language that would change the dental therapy scope from removing sutures to the placement and removal of sutures.

The dental professional placing sutures is expected to manage potential complications, such as premature opening of the incision line and its subsequent complications due to improper closure and tension, or to an inappropriately selected suture technique and/or material for the surgical procedure in question. Additional complications include “dead space” creation between a flap and alveolar bone resulting from pooled blood under the flap, interruption of the blood supply to the incision line from an inappropriate number of sutures placed, a compromise in the healing and final position of gingiva or mucosa resulting from improper positioning of a flap, delayed clotting necessitating the management of excessive bleeding, and potential hematomas.

The success of oral surgery relies as much on its closure with excellent suturing techniques and extensive knowledge of the principles of suturing as it does on the surgical technique itself. A poorly or inadequately closed incision line can compromise the most well-executed surgery. It is for this reason that further discussion is warranted on the intended clinical circumstance in which dental therapists would be permitted to place sutures, and to clarify with whom the final liability for these complications, should they arise, lies.

With respect to the proposal change to add the placement of hard relines to removable prostheses, the AGD has concerns about the consequences that could result from improperly relined complete or partial dentures. Such complications include the formation of tissue sores

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and folds, which can take weeks to resolve, and unintended changes to the denture occlusion, both of which necessitate the ultimate replacement of the reline.

The AGD kindly requests that the Board consider the patient safety implications of any changes to Section 160A/150(4)(c) and rejects the proposal to expand the dental therapy scope of practice to include placing sutures and hard relines.

Sincerely,

A handwritten signature in black ink, appearing to read 'MW'.

Marc Worob, DDS, FAGD
President
Academy of General Dentistry

A handwritten signature in black ink, appearing to read 'Daniel Johnson'.

Daniel Johnson, DDS, MAGD
President
MN Academy of General Dentistry

CC: Minnesota Board of Dentistry Executive Director Bridgett Anderson

jjf:MW