



The Honorable Angelique Ashby
California State Senate
1021 O St. Suite 7340
Sacramento, CA 95814

Re: SB 1453 (Ashby) - Oppose

Dear Senator Ashby:

The California Society of Plastic Surgeons (CSPS) is writing in Opposition to SB 1453. SB 1453 is the Dental Board of California sunset review bill. We are specifically opposed to the provisions in Section 1638.1 that eliminates the credentialling committee charged with reviewing applications from single degreed oral surgeons seeking an elective facial cosmetic surgery permit and makes other changes to the process.

SB 438 (Migden - 2006) was the legislation that established the process for an oral surgeon, who does not have a medical degree, to be able to apply to the Dental Board for a permit to allow them to perform elective facial cosmetic surgery procedures. A central part of the process to protect the public was the establishment of a credentialling committee comprised of five members to include a plastic surgeon, a surgeon specializing in otolaryngology, and three oral surgeons, at least one of which would be a DDS/MD. This credentialling committee is responsible for reviewing the applications from oral surgeons which include operative reports of procedures the applicant feels are representative of their competence to perform these medical procedures in one of two categories. After reviewing the applications, the credentialling committee then makes recommendations to the Dental Board on whether the applicant should receive a permit for either of the categories and any limitations that may be required with issuing a permit. This is not a cursory "check box" review. This is an evaluation of the competency and ability of the applicant to perform the requested procedures. It was viewed the public would be better protected by having the credentialling committee reviewing and making recommendations on the competency of the applicants.

CSPS was heavily involved in working on this issue from 2004 – 2006 and had significant concerns with allowing oral surgeons to perform these elective facial cosmetic procedures. It was very important to our organization and the Legislature that the credentialing committee be established to ensure applicants were being reviewed by medical and dental experts and the public was being protected.

The recent amendments included in SB 1453 to Section 1638.1 would eliminate the credentialing committee. The Dental Board staff would then be responsible for reviewing the applications along with the operative reports to make a determination over whether an oral surgeon, without a medical degree, should be allowed to perform these complex procedures and what, if any, limitations to be placed on those permits. The Dental Board staff is not qualified to review applications and does not have expertise in understanding whether an oral surgeon's qualifications are sufficient to issue a permit to allow them to perform elective facial cosmetic procedures.

It is our understanding the Dental Board is concerned over the costs associated with having a public meeting. It should be noted the credentialing committee does not meet very often. Since 2018, the credentialing committee has met only eight times with numerous other meetings being cancelled the result of there being no applications to review. In addition, there are only 27 active permit holders for a program that has been in place since 2007. Perhaps the question for the Dental Board and the Legislature is whether this program is worth the time and cost to continue at all.

If this program is to continue, CSPS believes it is critically important the credentialing committee continue in its' current capacity as specified in statute. This is the best way to ensure the public is protected.

For these reasons we are opposed to SB 1453.

Sincerely,

A handwritten signature in cursive script, appearing to read "A Gosman".

Amanda Gosman, M D, FACS
President, California Society of Plastic Surgeons (CSPS)

cc. Senate Business and Professions and Economic Development Committee
Senate Appropriations Committee