

# **American Academy of Facial Esthetics (AAFE) Position Paper Injectable Use Within The Washington Definition of Dentistry June 2025**

## **Injectable Uses In Dentistry**

The uses of injectables such as neurotoxins, dermal fillers, solid filler PDO threads, and similar injectables include but are not limited to:

- Establishing proper lip lines and smile lines for dental esthetics
- Lip enhancement for dental esthetics and phonetics
- TMD/bruxism/headache/migraine/facial pain treatment or differential diagnosis
- Treatment of maxillary or mandibular gingival excess – gummy smile
- Treatment of gingival recession and dentin hypersensitivity
- Oral and peri-oral soft tissue enhancement for facial dental esthetics
- Treatment of black triangles
- Prevent / eliminate lower anterior teeth relapse
- Muscle pain during ortho treatment
- Elimination of bruxing and clenching
- Dental sleep medicine and airway management

The AAFE has delivered injectable continuing education at many dental universities and national, regional, and local dental society meetings. A partial list is provided with this position paper.

## **The Washington Definition Of Dentistry**

Here are the relevant sections regarding the definition of dentistry in Washington:

### **RCW [18.32.020](#) Practice of dentistry defined.**

“A person practices dentistry, within the meaning of this chapter, who (1) represents himself or herself as being able to diagnose, treat, remove stains and concretions from teeth, operate or prescribe for any disease, pain, injury, deficiency, deformity, or physical condition of the human teeth, alveolar process, gums, or jaw, or (2) offers or undertakes by any means or methods to diagnose, treat, remove stains or concretions from teeth, operate or prescribe for any disease, pain, injury, deficiency, deformity, or physical condition of the same, or take impressions of the teeth or jaw, or (3) owns, maintains, or operates an office for the practice of dentistry, or (4) engages in any of the practices included in the curricula of recognized and approved dental schools or colleges, or (5) professes to the public by any method to furnish, supply, construct, reproduce, or repair any prosthetic denture, bridge, appliance, or other structure to be worn in the human mouth.”

“The practice of dentistry includes the performance of any dental or oral and maxillofacial surgery. "Oral and maxillofacial surgery" means the specialty of dentistry that includes the diagnosis and surgical and adjunctive treatment of diseases, injuries, and defects of the hard and soft tissues of the oral and maxillofacial region.”

### **Washington Chapter 18.32 RCW and Interdisciplinary Matrix of Medical Spa Services Analysis**

Washington Chapter 18.32 RCW in its definition of dentistry does not prohibit the use of any technique, procedure, medication, or any treatment explicitly. Nowhere are any injectables prohibited in the Chapter 18.32 RCW. The Interdisciplinary Matrix of Medical Spa Services does not supersede or take the place of the Chapter 18.32 RCW which is the governing law.

Simply put, when injectables are used within the definition of Dentistry, then dentists are allowed to use injectables including but not limited to neurotoxin and dermal fillers in their practice.

The Interdisciplinary Matrix of Medical Spa Services seeks to limit the use of dermal fillers by general dentists by stating, “Dermal fillers may be utilized by Oral and Maxillofacial Surgeons as cited in RCW 18.32.020: "Oral and maxillofacial surgery" means the specialty of dentistry that includes the diagnosis and surgical and adjunctive treatment of diseases, injuries, and defects of the hard and soft tissues of the oral and maxillofacial region.”

The authors of the Interdisciplinary Matrix of Medical Spa Services inaccurately and selectively quote RCW 18.32.020 which clearly reads in its entirety (first line of this paragraph in bold added for emphasis), **“The practice of dentistry includes the performance of any dental or oral and maxillofacial surgery.** “Oral and maxillofacial surgery" means the specialty of dentistry that includes the diagnosis and surgical and adjunctive treatment of diseases, injuries, and defects of the hard and soft tissues of the oral and maxillofacial region.”

Clearly, every licensed dentist is able to perform “any dental or oral or maxillofacial surgery”. General dentists in Washington state practice oral and maxillofacial surgery every day with the procedures that they have been trained in including extractions, placing implants, bone grafting, osseous surgery, hard and soft tissue biopsy, and many other treatments.

It is impossible to misread or misunderstand the sentence in RCW 18.32.020 that reads “The practice of dentistry **includes** the performance of any dental or oral and maxillofacial surgery” to then exclude anything in general and dermal fillers specifically.

If the Interdisciplinary Matrix of Medical Spa Services wants to exclude dermal fillers, then it would have to exclude all oral and maxillofacial surgery by general dentists.

Is the Washington Dental Commission prepared to tell licensees to cease and desist from oral surgery procedures?

### **Washington Dental Commission Business Meeting on April 25, 2025**

Regarding the discussion regarding neurotoxins and dermal fillers at the Washington Dental Commission Business Meeting on April 25, 2025, the minutes report “Ms. Carter clarifies that RCW 18.32.020 (4) refers to the curricula in more than one school.” It seems there was a discussion regarding whether dermal fillers should be allowed as it was reported that only one dental school has dermal fillers in its curriculum. In addition, the Interdisciplinary Matrix of Medical Spa Services often refers to this line which it mistakenly uses to exclude treatments which dentists may offer to their patients.

RCW 18.32.020 (4) of the definition of dentistry does not require that every product, procedure or treatment performed by Washington dentists must be included in dental school curricula. **RCW 18.32.020 (4) is one of 5 ways to define the term dentistry, it is not a limitation or exclusion as to whether or not a dental treatment may be performed by a dentist, as evidenced by the word “or” which precedes (4).**

The requirement for a dentist to use a product, device, or treatment is for the item to be FDA cleared or FDA approved at which point the dentist may use said product, device, or treatment within the standard of care and within the definition of dentistry as defined by RCW 18.32.020.

Most innovations in dentistry over the last 100+ years did not begin in dental school curricula. One simple example is teeth whitening. Dentists in Washington and across the country performed teeth whitening for years prior to it ever being taught in any dental school. The same is true of root form implants, clear aligners, dental lasers, zirconia crowns, resin ionomer cements, and even composite resins were used by Washington dentists before any of these appeared in any dental university. DQAC in the past and the Washington Dental Commission in the present never prevented dentists from using these technologies or products.

Here is a sampling of dental products, treatments, and technologies which are not currently in dental school curricula which are in use by Washington dentists and dentists across the US:

- Salivary diagnostics
- Bone grafting using PRF and PDGF
- Gum Builder regenerative periodontics
- Guided Piezosurgery
- Zygomatic implants
- Pinhole technique

Is the Washington Dental Commission today prepared to tell licensees to cease and desist from every product, procedure or treatment which is currently standard of care in dentistry which is not taught in a dental school curriculum?

## **Washington Patient Safety and Access To Care**

The primary mission of any Dental Board is patient safety. The Interdisciplinary Matrix of Medical Spa Services position on dermal fillers in dentistry harms patients by denying Washington citizens access to all possible dental treatment options. In many cases, injectables including dermal fillers have proven to deliver the best and optimal dental treatment outcomes for patients.

The Interdisciplinary Matrix of Medical Spa Services will limit Washington dentists who want the ability to freely practice dentistry as it is practiced all over the United States and provide their dentists the best care available.

The Board is fully aware of the many Washington dental professionals have been trained and are using injectables in their practices within the definition of dentistry and have a record of safety and excellent outcomes for their patients.

The AAFE has trained Washington dentists in the use of injectables since 2011 and can confidently say that dentists with their knowledge of the face, head and neck are among the best suited healthcare professionals to deliver all injectables for cosmetic and therapeutic uses. This reflects a 14-year record of safety using neurotoxin and dermal fillers on patients by Washington dentists. Commission members would be challenged to find any other dental treatment that can match this safety record.

AAFE President Dr. Louis Malcmacher was invited to be the keynote speaker at the 2024 American Association of Dental Boards (AADB) Spring Meeting and discuss injectables in dentistry. Some of the Washington Dental Board members and the executive director may have been present. The lecture and discussion focused on educating dental board members and executive directors on:

- The many uses of neurotoxins, dermal fillers, and other injectables in dentistry
- How the safety profile of neurotoxins and dermal fillers far exceeds any other dental treatment as evidenced by state dental board complaints which are almost non-existent for injectables compared to any other dental treatment
- The growing number of states that now allow dental hygienists to deliver injectables
- Various scenarios of how dentists are expanding their practices in dental facial esthetics.

The AAFE would be happy to educate interested Washington Dental Commission members and Interdisciplinary Matrix of Medical Spa Services committee members in the many uses of injectables in dentistry which have been in use for the last 18 years.

On behalf of AAFE members and all Washington dentists, we urge the Washington Dental Commission and the Interdisciplinary Matrix of Medical Spa Services committee to let the Washington Dental Practice Act speak for itself, support dentists who use injectables within the definition of dentistry, and let dentists practice freely to give the citizens of Washington access to the best treatment care available in dentistry today.

**AAFE Recommendations Regarding The Interdisciplinary Matrix of Medical Spa Services Document**

Primary recommendation – the Washington Dental Commission should reject the Interdisciplinary Matrix of Medical Spa Services and refer dentists to RCW 18.32.20

Alternative recommendation - Interdisciplinary Matrix of Medical Spa Services document should:

Eliminate any reference to “(4) engages in any of the practices included in the curricula of recognized and approved dental schools or colleges.”

Eliminate any reference regarding “Dermal fillers may be utilized by Oral and Maxillofacial Surgeons etc.”

Wherever neurotoxins are mentioned, the language should be changed to “Neurotoxins and dermal fillers”

On behalf of AAFE Washington Dentists, we appreciate the opportunity to present this to the Washington Dental Commission and the Interdisciplinary Matrix of Medical Spa Services committee members.

In our over 18 years of working with dental boards across the country, it is unprecedented that a dental board takes away a safe and effective treatment which Washington dentists have been delivering successfully to their patients. The AAFE strongly urges the Washington Dental Commission to move forward and not backward.

Respectfully submitted,



Dr. Louis Malcmacher  
President, American Academy of Facial Esthetics



## **Dental education on Botox and dermal fillers for general dentists for therapeutic and esthetic purposes in the oral and maxillofacial areas 2008 – 2024**

This partial list includes continuing education dental lectures and/or hands-on training programs that have been presented at the following dental universities (in residencies and continuing education courses for general dentists) and at the following dental associations and societies:

UCLA School of Dentistry	Quebec Dental Association Annual Meeting
USC School of Dentistry	Arizona Dental Association Annual Meeting
UCSF School of Dentistry	Texas Dental Association Meeting
UMDNJ School of Dentistry	Florida Dental Association Annual Meeting
Loma Linda School of Dentistry	Valley Forge Dental Association Meeting
University of Washington School of Dentistry	Greater Long Island Dental Meeting
University of Toronto School of Dentistry	Hinman Dental Meeting
University of Buffalo School of Dentistry	New Orleans Dental Conference
Iowa University Dental Society Meeting	Dentaltown Annual Meeting
Tufts University School of Dentistry	New Jersey Academy of General Dentistry
Boston University School of Dentistry	Sacramento District Dental Society
University of Michigan School of Dentistry	Maryland State Dental Association Meeting
University of British Columbia School of Dentistry	Michigan Dental Association Meeting
Louisiana State University School of Dentistry	Northern Virginia Dental Association Meeting
Nova Southeastern University School of Dentistry	Buffalo Niagara Dental Annual Meeting
University of Alabama School of Dentistry	Oregon Dental Association Annual Meeting
American Dental Association Annual Meeting	Texas Academy of General Dentistry Annual Meeting
American Dental Association Headquarter	Ontario Academy of General Dentistry Annual Meeting
Academy of General Dentistry	Alabama Academy of General Dentistry Annual Meeting
American Academy of Cosmetic Dentistry	Pennsylvania Academy of General Dentistry
California Dental Association Annual Meeting	Illinois Academy of General Dentistry Annual Meeting
Greater New York Dental Annual Meeting	Beverly Hills Dental Study Club
Chicago Dental Society Annual Meeting	Ohio Dental Association Annual Meeting
Northeastern Regional Dental Association	Maine Dental Association Annual Meeting
Kentucky Dental Association Annual Meeting	Detroit District Dental Society
North California Academy of General Dentistry	Utah Academy of General Dentistry
Indiana Dental Association	Florida National Dental Congress
Wisconsin Dental Association Annual Meeting	Hawaii Dental Association Annual Meeting
American Association of Dental Boards	Yankee Dental Congress

The American Academy of Facial Esthetics trains dentists in the use of Botox and dermal fillers in the oral and maxillofacial areas for dental esthetic and dental therapeutic uses. In the last 15 years, the American Academy of Facial Esthetics has educated over 30,000 healthcare professionals including over 20,000 dental professionals including general dental and dental specialty offices from all 50 states and 42 countries through over 500+ live patient training courses a year which has become the model and standard for accepted dental education in these procedures.