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Thank you for the opportunity to respond to the petitions for a Certificate of Need for the establishment of Dental Ambulatory Surgery Centers in NC. We understand there are two applications currently under review.

While it is difficult to comment on the two applications at this time due to a lack of complete information, we do not believe there is a need for a single specialty, dental ASC in areas where there is no shortage of trained surgeons or dentists. We do, however, see a potential need in shortage areas, particularly if there is a large number of pediatric cases going untreated.

Our concerns about the establishment of dental ASC's in our state include the following:

- What credentialing will be available for the dentists performing the surgery and anesthesia.
- What medical back-up will be available for post-surgery/anesthesia complications, especially those requiring hospital admission?
- How is the need determined for an ASC in communities where there are an ample number of Board Certified oral and maxillofacial surgeons currently serving the population and available to take new patients?

Therefore, the NCSOMS Executive Committee is opposed to the establishment of dental ASC's in areas where there is not a shortage of qualified surgeons available to serve the population.

Sincerely,

Kent Moore, MD, DDS
President