ADA CERP Provider Newsletter—Spring/Summer 2013

New CERP Application Forms Emphasize Self-Assessment and Performance in Practice

The CERP Committee has completed a comprehensive revision of the application forms for ADA CERP recognition. The newly revised Standard and Abbreviated Application forms will be available in July for use beginning with the Spring 2014 application cycle. As previously reported, the CERP Committee began the process of reviewing and revising the application forms in 2012, in part in response to feedback that the current forms contain redundant questions, contributing to a cumbersome application process. The Standard Application form was last revised in 2009; the Abbreviated Application was developed in 2007.

ADA CERP recognition is based on a provider's demonstrated compliance with ADA CERP Recognition Standards and Criteria, through a review of documentation and information about the provider's continuing education program. CERP's goals for revising the application forms were two-fold: to facilitate the assessment process for CE providers and CERP reviewers alike, and to ensure that recognition decisions are based on evidence of compliance with key criteria in the CERP Recognition Standards. The new application forms have been restructured to accomplish this by replacing the lengthy questionnaire of the current forms with a shorter "Self-assessment Rubric," and by placing a greater emphasis on documentation of a provider's practices, through the addition of an "Activity File."

The Self-assessment Rubric is a scoring tool that explicitly states the performance expectations for specific Recognition Criteria. After assembling the required documentation, providers will use the self-assessment rubric to evaluate whether their documentation and practices meet, partially meet or do not meet specific CERP Recognition Standards. The CERP Committee will use the same rubric to evaluate the applications. The self-assessment questionnaire is designed to be informative for providers, describing what is needed to meet individual criteria and helping to identify areas where improvements are needed, and to encourage reflective practice and continuous quality improvement in continuing education. The rubric also supports greater transparency regarding CERP recognition decisions, since providers and reviewers will use the same evaluation criteria.

For the Activity Files, providers will assemble documentation related to specific CE activities which the provider will be able to select. The Standard Application requires documentation for two CE activities; the Abbreviated Application requires documentation for one. Documents will include the publicity materials, needs assessment, course materials such as handouts or presentation slides, evaluation and assessment forms and summaries, instructions/guidance for instructors, signed conflict of interest forms, published disclosure, letters of agreement for commercial support, and verification of participation for each activity. Providers applying for CERP recognition have been asked...
to supply examples of these documents in the past, but it was not required that the
documents relate to a single course. CERP believes that a review of the full spectrum of
planning and implementation documents related to one or more specific CE activities will
provide a clearer understanding of a provider's performance in practice.

The application forms contain the following sections: Provider Information, Self-
assessment Rubric, and Activity Files. Providers that offer self-study activities or courses
in which patients are treated will complete additional supplements. By focusing on
essential criteria, the redesigned applications contain 30% fewer questions than the
current forms.

Providers submitting applications in Spring 2014, due January 4, 2014, will use the new
forms. The new Standard Application form and informational materials will be available at
www.ada.org/cerp beginning July 1. In preparation for submitting applications for
continued recognition, providers are encouraged to review course files to be sure that
they are complete.

**Call for Comments on Proposal to Create a Commission on Continuing Dental
Education Accreditation to Oversee CERP**

The Council and CERP Committee are considering a proposal to restructure ADA CERP
as an agency separate from the Council to better support the program's mission,
enhance its impartiality and objectivity, and minimize internal conflicts of interest. The
Council proposes the establishment of a new Commission on Continuing Dental
Education Accreditation under ADA Bylaws to oversee CERP. The commission would
have the authority to manage the program, including approval of CE providers, policies,
and standards. The commission's rules and annual operating budget would be approved
by the ADA House of Delegates, consistent with the ADA's other commissions, the Joint
Commission on National Dental Examinations and the Commission on Dental
Accreditation. The governing board of the commission would include representatives of
the current stakeholder groups, including the nine recognized dental specialties, the
American Dental Education Association (ADEA), the American Association of Dental
Boards (AADB), the American Society of Constituent Dental Executives (ASCDE), and
the ADA. It is anticipated that the commission would be supported by existing staffing
and financial structures.

Separating CERP from CDEL would reflect best practices in continuing education
accreditation. The Council's decision to explore a new model was made after reviewing
the organizational structures of other accrediting agencies in continuing education for the
healthcare professions, analyzing CERP's current structure and CE environment, and
assessing the advantages and disadvantages of several alternate models.

The Council is requesting comments from the broad communities of interest to the
proposal. Draft additions to the ADA Bylaws establishing a new commission and
proposed operating rules are appended to the Call for Comments. All interested parties
are invited to submit written comments on the proposal by September 1. Comments
should be addressed to Dr. Ronald Venezie, chair, Council on Dental Education and
Licensure, and may be submitted by e-mail, fax or mail to cerp@ada.org, Fax: 312-440-
2915, or ADA CERP, 211 East Chicago Ave, Chicago, IL 60611. If you have any
questions, please contact the ADA CERP manager, Ms. Mary Borysewicz, at
borysewiczm@ada.org or 800-622-8099, x2704.

**Physicians Transparency Program: Reporting Exemption Related to Accredited CE**

Effective August 1, 2013, the Centers for Medicare & Medicaid (CMS) Physician
Payment Transparency Program, also known as Open Payments, or the Sunshine Act,
will require manufacturers of drugs, devices, biological or medical supplies covered by
Medicare, Medicaid or the Children's Health Insurance Program ("applicable manufacturers") to report payments or transfers of value over $10 made to individual physicians and dentists (called "covered recipients") in a public database maintained by CMS. Transfers of value are defined to include consulting fees, honoraria, speaker fees, entertainment, travel, food, and gifts. The Open Payments program, Section 6002 of the Affordable Care Act, is designed to create greater transparency in health care markets and discourage the development of inappropriate relationships that create conflicts of interest that may result in unnecessary health care costs. Information about the program, including the complete Final Ruling, is available on the official website for the National Physician Payment Transparency Program.

ADA CERP’s existing requirements for disclosure and transparency have been acknowledged in the CMS rule, along with those of four other accrediting agencies for continuing healthcare education, by the creation of a reporting exemption related to CE activities. Section 42 CFR §403.904(g) of the Final Ruling specifically applies to continuing education that is accredited or certified for credit.

Under the new rule, manufacturers must report transfers of value to individual physicians and dentists. This includes transfers of value that are made through a third party, such as a dental association or a continuing education provider. However, the Open Payments rule exempts manufacturers from the reporting requirement if funds are given to an accredited provider of continuing education to pay a "covered recipient" who is a speaker in a CE activity, if all of the following conditions to ensure independence and transparency are met:

1. Funds are given to ADA CERP approved providers of continuing dental education (and to providers accredited by the ACCME, AMA, AAFP or AOA);
2. The manufacturer does not pay the covered recipient (speaker) directly; and
3. The manufacturer does not select the covered recipient (speaker) or provide the accredited provider with a distinct, identifiable set of individuals to be considered as speakers for the continuing education program.

Another reporting exemption that may be of interest to CE providers relates to commercial support for meals at CE activities. Under the Open Payments rule, funds given by a manufacturer to a third party, such as a CE provider or dental organization, that are used to support coffee breaks or buffet meals that are open to all participants in a large meeting do not have to be reported. However, if the funds are used to support a meal for a select group of individuals whose identities the manufacturer may establish, and the value of the meal is over $10, then the names of the individual doctors and dentists who participated and the value of the meal would need to be reported.

CE providers should note that responsibility for reporting payments rests with the applicable manufacturers. However, since manufacturers must report payments and transfers of value they make to covered recipients through a third party, with certain exceptions such as those described above, third party organizations accepting and distributing funds may be asked to assist the manufacturer in fulfilling its reporting responsibility by supplying the names and National Provider Identifier (NPI) for the physicians and dentists who ultimately received the transfers of value.

CERP Standards regarding acceptance and disclosure of commercial support have not changed. CERP approved providers must continue to publish disclosure of any commercial support received for CE activities, as well as disclosures of any relevant financial relationships that instructors and planners in the provider’s CE activities have had in the last 12 months.

More information about Open Payments and its implications for CERP approved providers
and ADA members will be made available in future newsletters, ADA News and on ADA.org.

**Provider Annual Reports and Fees Due July 1**

Invoices for the 2013 annual fee were mailed to all providers in May, along with the Provider Annual Report form. Reports and fees are due by July 1. Data collected from providers will be aggregated and published in the ADA CERP Annual Report as a service to the continuing dental education community. Review the most recent ADA CERP Annual Report at [www.ada.org/cerp](http://www.ada.org/cerp).

**Provider Workshop Planned for New Orleans**

The ADA CERP Committee will offer an informational session for continuing dental education providers in conjunction with the ADA Annual Session in New Orleans. The 2013 workshop will include an overview of the new application form, discuss documentation requirements, and help providers identify ways to demonstrate compliance with ADA CERP Recognition Standards. The workshop is scheduled for Friday, November 1, from 9am – 12:30pm. Register for Session 6170 at [www.ada.org/session](http://www.ada.org/session). There is an $85 registration fee for the session.

**CERP Recognition Actions—Spring 2013**

ADA CERP now recognizes a total of 430 national providers of continuing dental education. At its March 2013 meeting, the CERP Committee reviewed a total of 11 applications from new providers, 61 applications for continued recognition, 16 progress reports, and 4 requests for reconsideration of intent to withdraw recognition.

**Providers Awarded 4-year Terms of Recognition**

Congratulations to the following CE providers that were awarded four-year terms of recognition:

- American Association of Endodontists
- Boston University Goldman School of Dental Medicine
- Clinical Mastery Series (formerly Gold Dust Clinical Mastery LLC)
- Dental Society of Chester County and Delaware County
- DentalBehavioralResources.com
- DSCRI, Inc.
- Gerald M. Bowers Study Club in Periodontology, Inc.
- Hawaii Dental Association
- Henry Schein Dental Specialties Group
- Midwest Implant Institute
- Missouri Dental Association
- Neoss Inc.
- New Orleans Dental Association
- Oregon Dental Association
- Southern Illinois University School of Dental Medicine
- University of Kentucky College of Dentistry
- University of Southern California Ostrow School of Dentistry
- University of Texas - Health Science Center at San Antonio Dental School
- Warschaw Learning Institute

**Providers Awarded 3-year Terms of Recognition**

Congratulations to the following CE providers that were awarded three-year terms of recognition:

- Academy for Dental Implants & Cosmetic Dentistry
Fall 2013 Application Deadline

Applications and progress reports for the Fall 2013 decision cycle are due June 28, 2013. If your organization’s recognition term ends this December you should have received information on the reapplication process. If you have not received these materials, please contact ADA CERP staff immediately at 312-440-2869 or cerp@ada.org.

If you do not intend to apply for continued recognition, please submit written notice of your intent to withdraw voluntarily from the program on your organization’s letterhead.

Comments, Suggestions, or Questions about ADA CERP

The purpose of the ADA CERP Provider Newsletter is to inform recognized providers and other interested audiences about issues and changes related to ADA CERP. We welcome your inquiries and input about ADA CERP. Suggestions for content for the newsletter are also appreciated.

CDEL Leadership
Dr. Ronald Venezie, Chair, Council on Dental Education and Licensure
Apex, NC

ADA CERP Committee
Dr. James M. Boyle, Chair, York, PA
Dr. Eva F. Ackley, New Port Richey, FL
Dr. Robert Bruce Amato, Bedford, MA
Dr. David T. Brown, Indianapolis, IN
Dr. Laurie C. Carter, Richmond, VA
Ms. Carol J. Dingeldey, Southington, CT
Dr. Alan L. Felsenfeld, Los Angeles, CA
Ms. Janice L. Gibbs-Reed, Newark, NJ
Dr. Ralph L. Howell, Jr., Suffolk, VA
Dr. Kenneth A. Krebs, Glenview, IL
Dr. Kevin M. Laing, Van Wert, OH
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For more information about ADA CERP or the newsletter, contact ADA CERP staff at 312-440-2869 or cerp@ada.org.

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**Quick Links**
- ADA CERP info
- Resources for CE Providers
- CERP Course Listings
- List of Recognized CERP Providers