

1 **Consent Calendar:** A consent calendar was prepared to expedite the business of the Council. Dr.
 2 Thomas-Moses reminded Council members that any report, recommendation or resolution could be
 3 removed from the consent calendar for discussion. The following reports in their entirety, including
 4 recommendations, were placed on the consent calendar and adopted as received:

5 **Dental Education Committee:**

6 Update on Activities of the Commission on Dental Accreditation (CODA)

7 Consideration of Proposed Revision to the Accreditation Standards for Advanced Dental
 8 Education Programs in Dental Public Health

9 **Action:** The Council directed that written comment be sent to CODA supporting the
 10 proposed revisions to Standard 2-4 of the Accreditation Standards for Advanced Dental
 11 Education Programs in Dental Public Health.

12 Special Care Dentistry Association Letter to CDEL in Response to Resolution 100H-2020
 13 Special Needs Dentistry

14 **Licensure Committee:**

15 Consideration of the Policy on Licensure of Dental Assistants

16 **Action:** The Council directed that the policy titled, "*Policy on Licensure of Dental*
 17 *Assistants*" be retained as written and that this conclusion be reported to the 2022 ADA
 18 House of Delegates.

19 Update on Military Spouse Licensing Relief Bill

20 Update on Bills and Changes in State Regulations

22 **Dental Admission Testing Committee**

23 Dental Admission Test (DAT) Program Activities

24 **Action:** The Council approved the changes to the retest policy as follows:

- 25 • Candidates must wait 60-days between testing attempts on the DAT, with a
 26 maximum of four (4) such administrations permitted during any 12-month period
 27 of time.
- 28 • Candidates with three (3) or more attempts on the DAT must apply for
 29 permission to test again, providing proof of recent application to dental school
 30 with each subsequent application to test.
- 31 • Subsequent to the candidate's fifth DAT attempt, the candidate may retest only
 32 once per 12-month period.
- 33 • The preceding retest policy is not subject to appeal.

34 **Action:** The Council directed the Department of Testing Services (DTS) staff to solicit
 35 applications from individuals willing to serve as fairness and sensitivity reviewers for the
 36 Dental Admission Test (DAT) and Advanced Dental Admission Test (ADAT) programs,
 37 with review and selection of such applicants to take place in 2023.

38 **Action:** The Council approved the fairness and sensitivity review process proposed by
 39 the Department of Testing Services (DTS) staff and direct DTS staff to pilot the process
 40 in 2023 or as soon as logistically feasible, by applying the process to Reading

1 Comprehension Test content from the Dental Admission Test (DAT) and Data, Research
2 Interpretation, and Evidence-based Dentistry content from the Advanced Dental
3 Admission Test (ADAT).

4 **Action:** The Council directed the Department of Testing Services (DTS) staff to survey
5 academic deans and admission deans at U.S. dental schools to determine the
6 desirability of including a Physics section on the Dental Admission Test (DAT).

7 **Action:** The Council adopted the Strategic Goals and Roadmap as setting the strategic
8 direction for the Dental Admission Test (DAT) program.

9 **Action:** The Council directed staff to implement a new results reporting scale for Dental
10 Admission Test (DAT) scores, whereby reported scores for each DAT scale will have a
11 minimum of 200 and a maximum of 600, with scores reported in 10-point increments.

12 **Action:** The Council directed implementation of the new results reporting scale
13 concurrently with the implementation of three-parameter logistic (3PL) IRT model
14 scoring, which will occur as soon as logistically feasible but not before January 2024 in a
15 manner that supports the validity of the DAT program.

16 Advanced Dental Admission Test (ADAT) Program Activities

17 Reports from Committee Liaisons

18 Approval of Test Constructors to Serve in Test Constructor Pools 2023

19 **Action:** The Council appointed the individuals listed in the report to serve in the 2023
20 DAT Test Constructor Pool.

21 **Action:** The Council appointed the individuals listed in the report to serve in the 2023
22 ADAT Test Constructor Pool.

23 **Action:** The Council appointed the individuals listed in the report to serve in the Test
24 Constructor Pool and subject areas indicated.

25 Consideration of Dental Admission Testing Committee Testing Schedule

26 **Action:** The Council approved the new committee member rotation schedule.

27 **Recognition of Specialties and Interests Areas in General Dentistry Committee:**

28 Update on Activities of the National Commission on Recognition of Dental Specialties and
29 Certifying Boards (NCRDSCB)

30 Consideration of Revision to Application for Recognition as an Interest Area in General Dentistry

31 **Action:** The Council approved the proposed revised Recognition as an Interest Area in
32 General Dentistry Application Form (Appendix 1).

33 **Anesthesiology Committee:**

34 Update on Managing Sedations Complications Online Course

35 Update on CODA Pediatric Dentistry Anesthesia Standards

36 Update on the Development of Sedation and Anesthesia Clinical Practice Guidelines

37 **Continuing Education Committee:**

1 Consideration of Department of Continuing Education Business

2 Update on Commission on Continuing Education Provider Recognition (CCEPR)

3 Update on Council and Committee Current and Planned Continuing Education

4 **Emerging Issues, Trends and Miscellaneous Affairs:**

5 Update on the Council's Budget for 2022-2023

6 **Reports of Related Groups**

7 **Greetings from ADA President:** Dr. Sabates greeted the Council and praised the strides the
8 Association has made in the last year in building its relationships with its members. He highlighted the
9 attendance of six dental school deans at the June Board of Trustees meeting as proof of the greater
10 efforts being made in collaborating and moving forward to strengthen the education-practice
11 relationship and supporting membership.

12 **ADA Board of Trustees Liaison:** On the behalf of the Board of Trustees, Dr. Leighty provided the
13 Council with an update on Board activities. Dr. Leighty mentioned significant changes to the House of
14 Delegates communication and file sharing system that align with the ADA Strategic Plan's Digital
15 Transformation goal. He also highlight the other efforts being made to further the ADA's Strategic Plan.
16 Dr. Leighty noted that the Board is receiving ongoing diversity, equity and inclusion training during its
17 meetings, focusing on demonstrating this core value at the national and district levels.

18 **American Association of Dental Boards (AADB):** Dr. Socha-Mower expressed her appreciation for
19 the opportunity to speak to the Council and introduced new AADB staff member, Ms. Jill Schultz. Dr.
20 Socha-Mower noted that AADB continues to participate in the Opioid Regulatory Collaborative and
21 indicated that AADB will soon be announcing new partnerships with federal stakeholders. Information
22 about webinars, initiatives and strategic priorities is included in the AADB's weekly and quarterly
23 newsletters. Dr. Socha-Mower indicated that AADB seeks to work with dental boards in a more
24 strategic rather than reactive way regarding integration of care and technology. The next AADB
25 meeting will be in-person, October 7-9th in Asheville, North Carolina.

26 **American Dental Education Association (ADEA):** Ms. Stolberg highlighted recent ADEA events and
27 activities, beginning with ADEA's 2022 Annual Session. The in-person Annual Session, offered in
28 March 2022, was well-attended. The next ADEA Annual Session will be held on March 11-14, 2023 in
29 Portland, OR and will mark ADEA's 100th Anniversary. ADEA Continues to engage in the following
30 research and policy initiatives, e.g.:

- 31
- 32 • ADEA Survey of Dental School Seniors, Class of 2021
 - 33 • ADEA Dental School Applicants and Enrollees Report, 2021 Entering Class- In May 2022
 - 34 • Integration of Oral Health Care and Primary Health Care
 - 35 • ADEA Journal of Dental Education, June 2022 Issue

36 Dr. Stolberg reported that the Coalition for Modernizing Dental Licensure presented a program at the
37 2022 ADEA Annual Session entitled, "Modernizing Dental Licensure: Pandemic Changes and the
38 Future" with topics covering the review of the Coalition's structure, mission and goals; an update on
39 membership and resources; a focused look at licensure changes during the pandemic; an overview of
40 the dental licensure compact; and a reporting of key state actions. The ADEA eLearn site continues to
41 provide free webinars each month for membership with the "Clever Activities to Promote Active
42 Learning" webinar achieving the highest registration. Dr. Stolberg announced that the participants of the
43 ADEA Leadership Institute Class of 2022 are in the process of preparing for Phase I and Phase II of
44 their year-long program designed to develop the most promising individuals at academic dental

1 institutions to become future leaders in dental and higher education. ADEA is currently accepting
2 applications for its ADEA Emerging Leaders Program designed to provide early-career faculty showing
3 great promise as potential leaders the guidance, insight and skills needed to build an academic career.
4 Additional ADEA Professional Development Programs include: 2022 ADEA Allied Dental Program
5 Directors' Conference, ADEA 2022 Summer Leadership Essentials for Allied Dental Educators, and the
6 ADEA Credentialing Program.

7 As part of its diversity, equity and inclusion initiatives, ADEA conducted its dental education-wide
8 climate assessment survey from January 2022 through March 2022, collecting baseline data on
9 diversity, equity and inclusion at U.S. and Canadian dental schools and allied dental programs and
10 kicked off a series of events aimed at developing and implementing solutions to the lack of men of color
11 in the academic health professions. Ms. Stolberg concluded her report by highlighting the 2022 ADEA
12 GoDental Virtual Fair and summarizing topics of focus during the ADEA Associated American Dental
13 Schools Application Service (AADSAS) Town Hall Meetings.

14 **Joint Commission on National Dental Examinations (JCNDE):** Dr. Waldschmidt shared an update
15 on the activities of the Joint Commission on National Dental Examinations (JCNDE). The Council was
16 reminded of the JCNDE'S mission and vision, the licensure examination programs it oversees, and that
17 it is a Commission of the ADA with independent authority to carry out its program and duties. Ongoing
18 and upcoming JCNDE strategic initiatives include broadening the scope and comprehensiveness of
19 skill evaluation, improvements to scoring precision and increasing the accuracy in assessing candidate
20 skills and ability to practice safely, improvements to measurement and test security, and a focus on
21 JCNDE communications and increasing stakeholder engagement. Dr. Waldschmidt also highlighted the
22 activities of the ADA's Department of Testing Services (DTS) which develops examinations and related
23 content, oversees analysis and scoring of examinations and provides psychometric support in
24 development of new programs. Operational activities of DTS include test administration, test security
25 and fraud prevention, project management, communications and volunteer and meeting coordination.
26 Finally, Dr. Waldschmidt noted the impact on and response of the Department of Testing Services to
27 the cybersecurity incident in April.

28 **Senior Vice President, Education/Professional Affairs:** Dr. Ziebert made a presentation on trends in
29 dental education and reported on the activities of the ADA Division of Education and Professional
30 Affairs. Dr. Ziebert informed the Council that the Board's Finance Committee was reviewing preliminary
31 budgets for the coming year; no major revisions are anticipated. Dr. Ziebert reported that 2023 goals for
32 the division were being finalized in light of the month-long cybersecurity incident in April 2022. He gave
33 an overview of the impact the incident had on the Education Division.

34 **American Student Dental Association (ASDA):** Mr. Cannon reported that during the 2020-2021
35 membership year, ASDA had a total of 22,429 members and 68 chapters. The theme for ASDA's
36 national magazine, Contour, in May was Fight and Flight. ASDA currently has four campaigns where
37 members can act in support of the following bills: H.R. 4439 / S. 3166: Medicaid Dental Benefits Act;
38 H.R. 4122 / S. 3658: Resident Education Deferred Interest (REDI) Act; H.R. 2160: Student Loan
39 Refinancing Act; and H.R. 1918: Student Loan Refinancing and Recalculation Act. Mr. Cannon also
40 highlighted the availability of webinars to ASDA members, both live and on-demand, with the recent
41 webinar offered, "The Ask Me Anything: Adjusting to Post-Graduate Life. ASDA recently launched *The*
42 *ASDA Community* application available via desktop and mobile application, providing members the
43 opportunity to share resources, ideas and meet fellow dental students from across the country at any
44 time from any location. ASDA promoted its Wellness Wednesday program with a spring-cleaning
45 challenge encouraging members to focus on their environmental wellness by reducing clutter in their
46 physical surroundings. Mr. Cannon concluded his report by noting that its Spring meetings took place
47 on April 9-10, 2022 in Chicago with attendees receiving training on essential leadership skills, tips to

1 improve writing and communication, and information on diversity, equity & inclusion in the context of
2 their leadership tenure.

3 **New Dentist Committee:** Dr. Johnson provided an update on the activities of the New Dentist
4 Committee. Dr. Johnson shared that the NDC is working on membership growth opportunities by
5 finding and creating things that add value to new dentists that will entice them to join and remain ADA
6 members (i.e. student loan repayment refinancing). Dr. Johnson reported that the recipients of the 10
7 Under 10 award would be recognized in Houston during SmileCon. The NDC has a subcommittee
8 dedicated to coordinating activities during SmileCon for the new dentist attendees. Some events
9 include meet-ups for networking and areas for open discussion among peers. Dr. Johnson also
10 encouraged the Council to visit the ADAPT Blog for success stories and information about the program.
11 The New Dentist Committee continues to foster a more inclusive and diverse environment for new
12 dentists and encourage them to get involved and started on the pathway to leadership.

13 **Committee Reports:**

14 **Dental Education Committee Summary Report:** Dr. Lepowsky presented the Committee's comments
15 and recommendations to the Council. The following summarizes the agenda items discussed and the
16 Council's actions.

17 **Consideration of Proposed Revision to the Accreditation Standards for Advanced Dental
18 Education Programs in Dental Anesthesiology:** The Council reviewed a written report that detailed
19 CODA's drafted revisions to the current Accreditation Standards for Advanced Dental Education
20 Programs in Dental Anesthesiology based on the findings of the recently conducted validity and
21 reliability study of the standards.

22 The Committee carefully reviewed and supported the proposed revisions. The Dental Education
23 Committee agreed with the Commission and its Dental Anesthesiology Review Committee that subpart
24 2-2i, regarding chronic pain related to the head and neck region and subpart 2-6c, regarding exposure
25 to the management of patients with chronic orofacial pain be considered for deletion noting that these
26 two subparts may be outside the scope of practice for dental anesthesiology and may fall closer within
27 the scope of orofacial pain. However, the Council's Anesthesiology Committee also reviewed the
28 proposed revisions, concluding that familiarity with the diagnosis and treatment of chronic pain
29 conditions in the head and neck region is important and should remain in the standards. After
30 consideration and discussion, the Council agreed with the Anesthesiology Committee and
31 recommended communication be sent urging CODA to retain the standards as currently written.

32 **Action:** The Council directed that written comment be sent to CODA opposing the proposed
33 revisions to the Accreditation Standards for Advanced Dental Education Programs in Dental
34 Anesthesiology and urging that the Standards be retained as written.

35 **Consideration of Nominees for the CDEL Tuition Scholarship to the Academy for Academic
36 Leadership's Institute for Teaching and Learning:** The American Dental Association's
37 CDEL/Academy for Academic Leadership's Institute for Teaching and Learning Tuition Scholarship
38 provides an opportunity to recognize members who are pursuing careers in dental academia. This
39 scholarship program, initiated in 2015, awards three aspiring general dentistry faculty members
40 interested in academic careers.

41 The Dental Education Committee recommended, and the Council concurred, that Dr. Woodstock Tom,
42 was deserving of the 2022 scholarship. Dr. Tom is a graduate of the University of Nevada, Las Vegas
43 School of Dental Medicine where he works full-time as an Assistant Professor in Residence and Course
44 Director for an Operative Dentistry course.

1 **Action:** The Council awarded Dr. Woodstock Tom with the 2022 CDEL Tuition Scholarship to
 2 the Academy for Academic Leadership's Institute for Teaching and Learning.

3 **CODA Workforce Updates:** The Committee reviewed the current Accreditation Standards for Dental
 4 Assisting Education Programs and discussed a possible revision to Standard 2-1 that would allow
 5 dental assisting programs and their sponsoring postsecondary institutions to determine solely the
 6 program's admission criteria, procedures and policies. With this change, a sponsoring postsecondary
 7 institution and program would have the prerogative to matriculate high school students wishing to
 8 enroll, perhaps on a part-time basis, in an accredited dental assisting program. It was noted that
 9 providing this greater flexibility in Standard 2-1 aligns with the Commission's intent to "encourage
 10 curricular experimentation, development of institutional individuality, and achievement of excellence
 11 without establishment of uniformity." The Committee believed that such a change would allow programs
 12 to determine their specific admission requirements which may increase their enrollments and help to
 13 alleviate the ongoing workforce shortage of dental assistants. The Council agreed and supported the
 14 proposed revision to Standard 2-1 of the Accreditation Standards for Dental Assisting Programs
 15 (deletions are ~~stricken~~):

16 **2-1 Admission of students must be based on specific published criteria, procedures and**
 17 **policies that include a high school diploma or its equivalent, or post-secondary degree.**
 18 **Previous academic performance or other predictors of scholastic aptitude and ability must**
 19 **be utilized as criteria in selecting students with the potential to successfully complete the**
 20 **program. Applicants must be informed of the criteria and procedures for selection, goals of**
 21 **the program, curricular content, course transferability, scope of practice and employment**
 22 **opportunities for dental assistants.**

23 In addition, the Committee reviewed the current Accreditation Standards for Dental Hygiene Education
 24 Programs and discussed a possible revision to Standard 2-1 noting that by removing the language
 25 requiring the curriculum to include at least two academic years of full-time instruction or its equivalent
 26 at the postsecondary college level, dental schools would have the option to develop accelerated dental
 27 hygiene programs similar to what occurs in nursing education. The Committee noted that candidates
 28 may already possess a four-year degree and have prerequisites completed or have experience in the
 29 dental field as a certified dental assistant. The Council considered the following proposed revision to
 30 Standard 2-1 of the Accreditation Standards for Dental Hygiene Education Programs (deletions are
 31 ~~stricken~~):

32 ~~**2-1 The curriculum must include at least two academic years of full-time instruction or its**~~
 33 ~~**equivalent at the postsecondary college level. The scope and depth of the curriculum**~~
 34 ~~**must reflect the objectives and philosophy of higher education. The college catalog must**~~
 35 ~~**list the degree awarded and course titles and descriptions.**~~

36
 37 **In a two-year college setting, the graduates of the program must be awarded an associate**
 38 **degree. In a four-year college or university, graduates of the program must be awarded an**
 39 **associate or comparable degree, post-degree certificate, or**
 40 **baccalaureate degree.**

41
 42 The Committee and Council did not support the proposed revision, concluding that the phrase "or its
 43 equivalent" provides sponsoring institutions and their dental hygiene programs the latitude to develop
 44 an accelerated curriculum model if they so wish. Further, the Accreditation Standards for Dental
 45 Hygiene Programs includes language encouraging advanced standing for students who have
 46 completed previously equivalent course work.

1 **Licensure Committee Summary Report:** Dr. Hardesty presented a brief update on the letter sent by
2 the Council after its January meeting to state dental associations that had not yet joined the Coalition
3 for Modernizing Dental Licensure encouraging them to consider membership. In response to the letters
4 sent April 1, 2022 to 34 state dental associations, nine associations have taken action to date with, two
5 joining the Coalition, five noting that they would discuss the issue with their leadership, and two
6 respectfully declining membership.

7 **Dental Admission Testing Committee Report:** Dr. Lepowsky presented the Committee's comments
8 and recommendations to the Council. The Council adopted the majority of the Committee's
9 recommendations by consent. The following summarizes the agenda item discussed and the Council's
10 action.

11 **Consideration of Nominations for a Vacancy on the Dental Admission Testing Committee:** The
12 Council discussed the expiring term of the Dental Admission Testing Committee member, Eugenia E.
13 Mejia, who will complete her term in October 2022. The Council sought nominations to fill the
14 Admissions Officer/Registrar/Administrator position. Accordingly, the Council sought nominees
15 employed by dental education programs and/or advanced dental education programs accredited by the
16 Commission on Dental Accreditation and have knowledge and experience in admission procedures,
17 testing, and predoctoral and/or advanced dental education. The Committee reviewed and supported the
18 nomination of Dr. Cheryline Pezzullo; the Council agreed.

19
20 **Action:** The Council appointed Dr. Cheryline Pezzullo to serve on the Dental Admission Testing
21 Committee for a four-year term commencing at the close of the 2022 ADA House of Delegates.

22 **Recognition Committee Summary Report:** Dr. Otomo-Corgel presented the Committee's comments
23 and recommendations to the Council. The following summarizes the agenda items discussed and the
24 Council's actions.

25 **Consideration of Academy of Operative Dentistry's Application for Continued Recognition as an**
26 **Interest Area in General Dentistry:** ADA protocols require that policy statements be reviewed
27 periodically to ensure accuracy and continued relevance. The Council noted its responsibility for
28 conducting the periodic review of the statement on Operative Dentistry, Cariology and Biomaterials.
29 Accordingly, the Academy of Operative Dentistry (AOD) was requested to submit the Application for
30 Continued Recognition of "operative dentistry, cariology and biomaterials" as an Interest Area in
31 General Dentistry to CDEL no later than May 15, 2022 as a means of demonstrating ongoing
32 compliance with the ADA *Criteria for Recognition of Interest Areas in General Dentistry (Criteria)*. The
33 Recognition Committee carefully considered the Academy's Application for Continued Recognition and
34 concluded that the application demonstrates continued compliance with the *Criteria*. The Council
35 agreed and further concluded that the related policy statement should be maintained as written:

36 **Recognition of Operative Dentistry, Cariology and Biomaterials as an Interest Area in**
37 **General Dentistry** (*Trans.2016:304; 2017:274*)

38 **Resolved**, that operative dentistry, cariology and biomaterials is an interest area in general
39 dentistry recognized by the American Dental Association and sponsored by the Academy of
40 Operative Dentistry.

41 In reviewing the Academy's Application for Continued Recognition, the Committee noted that the
42 definition of this interest area and the competencies and proficiencies defined in the application could
43 be better aligned. The Committee believed that the Council should urge the Academy to continue to
44 collaborate with the advanced dental education programs to ensure that the definition and scope of the
45 interest area complements the competency and proficiency statements, particularly when addressing

1 Criteria 1, 2 and 4 of the ADA *Criteria for Recognition of Interest Areas in General Dentistry*. The
 2 Council concurred with the Committee's recommendation.

3 **Action:** The Council directed that written correspondence be sent to the Academy of Operative
 4 Dentistry noting its conclusion that the Application for Continued Recognition of Operative
 5 Dentistry, Cariology and Biomaterials as an Interest Area in General Dentistry demonstrates
 6 continued compliance with the ADA *Criteria for Recognition of Interest Areas in General*
 7 *Dentistry*.

8 **Action:** The Council directed that the policy statement, Recognition of Operative Dentistry,
 9 Cariology and Biomaterials be retained as written and that this be reported to the 2022 House of
 10 Delegates.

11 **Consideration of Comments from Communities of Interest on ADA's Requirements for**
 12 **Recognition of Dental Specialties and National Certifying Boards for Dental Specialists:** The
 13 ADA's *Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental*
 14 *Specialists (Requirements)* was last reviewed by the Council in 2018 and due for review no later than
 15 2023. However, the 2021 ADA House of Delegates adopted Resolution 108H-2021 calling for the
 16 review to commence in 2022. Accordingly, at its January 2022 meeting, the Council directed that a call
 17 for comment on the *Requirements for*

18 *Recognition of Dental Specialties and National Certifying Boards for Dental Specialists*, including a
 19 proposed amendment previously submitted by the National Commission, be circulated to the
 20 communities of interest for review and comment. The call for comment was circulated to the
 21 communities of interest in February 2022; comments were due April 1, 2022.

22 Dr. Nickman shared that the Committee met on April 27 during which time, the Committee reviewed the
 23 comments received from the communities of interest, including the extensive amendments proposed by
 24 the National Commission on Recognition of Dental Specialties and Certifying Boards (Appendix 2). Dr.
 25 Nickman highlighted that the Committee supported almost all of the extensive amendments proposed
 26 by the National Commission noting the Commission's recent experience applying the *Requirements* in
 27 recognizing three new dental specialties and three new specialty certifying boards. He also shared that
 28 the Committee believed that several of the proposed revisions by the National Commission were too
 29 vague, inconclusive, and/or were already covered by current material and therefore, the Committee did
 30 not support those proposed amendments. The Committee requested that CDEL staff prepare a
 31 document with the proposed revisions to the *Requirements* for the Committee's review at its June 8
 32 meeting. Dr. Nickman reported that the Committee met again on June 8 during which time the
 33 Committee reviewed the document with the proposed revisions to the *Requirements* and recommended
 34 that the Council pursue the amendments as presented in Appendix 3. The Committee also believed
 35 that the Council should express its appreciation to the organizations that responded to the call for
 36 comment. After careful discussion, the Council agreed with the Committee and directed that the
 37 proposed revisions as presented in Appendix 3 be transmitted to the 2022 House of Delegates and that
 38 those communities of interest that commented on the *Requirements* be thanked.

39 **Action:** The Council directed that the proposed revisions (Appendix 3), to the "*Requirements for*
 40 *Recognition of Dental Specialties and National Certifying Boards for Dental Specialists*" be
 41 transmitted to the 2022 House of Delegates.

42 **Action:** The Council directed that those communities of interest that commented on the
 43 *Requirements* be thanked and that the Council's proposed amendments to the *Requirements* be
 44 provided to those organizations once they are available for the 2022 House of Delegates.

45 **Consideration of Nominations for a Vacancy on the Recognition of Dental Specialties and**

1 **Interest Areas in General Dentistry Committee:** The Committee discussed the expiring term of the
2 Recognition Committee member, Dr. Eva F. Ackley, who will complete her term in October 2022.
3 Nomination to fill the General Dentist/Practitioner position were sought. The nominations of Scott Kim,
4 DDS and Richard Taliaferro, DDS were received and considered. The Committee recommended and
5 the Council supported the nomination of Dr. Scott Kim.

6 **Action:** The Council appointed Dr. Scott Kim to serve on the Recognition Committee for a four-
7 year term commencing at the close of the 2022 ADA House of Delegates.

8 **Anesthesiology Committee Report:** Dr. Nielson presented the Committee's comments and
9 recommendations to the Council.

10 **Consideration of AAPD and ASDA Appointments to the Anesthesiology Committee:** Dr. Nielson
11 noted that American Society of Dentist Anesthesiologists (ASDA) representative, Dr. Christine Quinn,
12 and American Academy of Pediatric Dentistry (AAPD) representative, Dr. Travis Nelson, will complete
13 their terms of service on the Anesthesiology Committee at the conclusion of the 2022 ADA House of
14 Delegates meeting in October. The Council reviewed nominations for the upcoming vacancies and
15 agreed with the Committee's recommendations for new ASDA and AAPD appointees.

16 **Action:** The Council appointed James W. Tom, DDS, MS, FACD to serve as the ASDA
17 representative on the Anesthesiology Committee for a four-year term commencing at the close
18 of the 2022 ADA House of Delegates.

19 **Action:** The Council appointed Sarat Thikkurissy, DDS, MS to serve as the AAPD
20 representative on the Anesthesiology Committee for a four-year term commencing at the close
21 of the 2022 ADA House of Delegates.

22 **Consideration of Proposed Revision to the Accreditation Standards for Advanced Dental**
23 **Education Programs in Dental Anesthesiology:** The discussion on the agenda topic, "Consideration
24 of Proposed Revision to the Accreditation Standards for Advanced Dental Education Programs in
25 Dental Anesthesiology" took place during the Dental Education Matters portion of the Council meeting
26 as both the Dental Education Committee and Anesthesiology Committee reviewed the written report
27 that detailed CODA's drafted revisions to the current Accreditation Standards for Advanced Dental
28 Education Programs in Dental Anesthesiology based on the findings of the recently conducted validity
29 and reliability study of the standards. Dr. Lepowsky, chair of the Dental Education Committee, shared
30 that the Dental Education Committee carefully reviewed and supported the proposed revisions. The
31 Dental Education Committee agreed with the Commission and its Dental Anesthesiology Review
32 Committee that subpart 2-2i, regarding chronic pain related to the head and neck region and subpart 2-
33 6c, regarding exposure to the management of patients with chronic orofacial pain be considered for
34 deletion noting that these two subparts may be outside the scope of practice for dental anesthesiology
35 and may fall closer within the scope of orofacial pain. However, the Council's Anesthesiology
36 Committee also reviewed the proposed revisions, concluding that familiarity with the diagnosis and
37 treatment of chronic pain conditions in the head and neck region is important and should remain in the
38 standards. After consideration and discussion, the Council agreed with the Anesthesiology Committee
39 and recommended communication be sent urging CODA to retain the standards as currently written.
40 The Council's action is recorded under the Dental Education Committee's portion of these minutes.

41 **Continuing Education Committee:** Dr. Nickman reminded the Council that the majority of the
42 Committee's business was approved via the consent calendar and provided a brief summary of the
43 Committee's discussion about emerging topics in continuing education. The Committee's charge, in
44 addition to recommending new and revised Association policy on continuing education and lifelong
45 learning, is to set strategy for and oversee ADA-sponsored continuing education. Included in the scope

1 of this responsibility are internally funded and externally funded online and live continuing education
2 courses and events hosted by ADA agencies or subsidiaries outside the ADA annual meeting (i.e.,
3 SmileCon). It was emphasized that the ADA desires to address the continuing education needs of the
4 entire membership and Committee members were encouraged to speak with colleagues at the state
5 and local levels to solicit ideas for new online and live continuing education courses. A basecamp site
6 was established to provide a venue for Committee members to communicate ideas about continuing
7 education content, courses and speakers. At the conclusion of the report, Dr. Nickman and Dr.
8 Thomas-Moses shared comments based on their observations of the recent CE Committee meeting.
9 They noted that while Committee meetings provide a forum for Councils and other ADA agencies to
10 share information and discuss their current and planned continuing education activities, there are few
11 tangible actions taken by the Committee related to creation and innovation of continuing education
12 content and courses; Committee actions are primarily focused on policy review. The Council discussed
13 this issue and directed that an ad hoc committee be created to evaluate and make recommendations
14 for the continuing education enterprise at the ADA.

15 **Action:** The Council directed that an ad hoc committee composed of ADA members and staff
16 be appointed to review the current governance and operational aspects of the ADA's continuing
17 dental education enterprise and make recommendations to improve process efficiencies and
18 enhance the quality and variety of offerings.

19 **Emerging Issues, Trends and Miscellaneous Affairs:**

20 **ADA Executive Director's Update:** Dr. Cohlmia presented "A New Day at the ADA - Creating Our
21 Future." Dr. Cohlmia was joined by Dr. Vujicic who discussed changes in the dental workforce. Dr.
22 Cohlmia stressed the need for the ADA to embrace two goals, i.e., focusing on the member and
23 building a culture of acceptance. Dr. Cohlmia described five principles of business and new "customer
24 groups" for the operations of the ADA.

25 **Dental Education Trends and UIC-ADA Dental Public Health Residency Program:** Dr. Ziebert
26 informed the Council that the University of Illinois-Chicago College of Dentistry submitted a proposal to
27 the American Dental Association for a joint dental public health residency program. He summarized the
28 report and described the rationale for the creation of the program, the ADA's Board of Trustees'
29 decision to negotiate a Memorandum of Understanding, and the terms of the new agreement.

30 In the one-year postdoctoral education program, the ADA will serve as an off-campus site for
31 educational experiences for up to two residents per year for two days per week in the ADA Health
32 Policy Institute and the ADA Division of Government Affairs. The ADA has committed to providing
33 \$100,000 in support of the program for the first three years to help off-set resident stipends. UIC is
34 committed to obtaining federal grant money to replace the ADA contribution after year three of the
35 program. The MOU is for an initial three-year term and will automatically renew from year to year
36 thereafter for ten (10) years unless terminated earlier by either party. The faculty at UIC is currently
37 completing the documentation necessary to apply for initial accreditation. It is anticipated that
38 application will be submitted by the deadline for and entering class of residents in 2023.

39 **Consideration of Workforce Letters by State Dental Associations:** Dr. Lepowsky and Dr. Tanguay
40 led the Council in reviewing correspondence dated May 19, 2022 to the Commission on Dental
41 Accreditation submitted by fifteen state dental associations requesting consideration of revisions to the
42 Accreditation Standards for Dental Assisting Education Programs. The Council appreciated the
43 thoughtful and deliberate nature of the state dental associations' request, recognizing the current
44 shortage of dental assistants and the impact the shortage is having on access to patient care.
45 Accordingly, the Council urges the Commission to also review the Accreditation Standards for Dental

1 Assisting Education Programs regarding faculty-to-student ratios and the qualifications of program
2 administrators as requested in the letter.

3 Further, the Council also reviewed correspondence dated May 19, 2022 to the Commission on Dental
4 Accreditation from sixteen state dental associations requesting consideration of revisions to the
5 Accreditation Standards for Dental Hygiene Education Programs. The Council appreciated the
6 thoughtful and deliberate nature of the state dental associations' request, recognizing the shortage of
7 dental hygienists and its impact on access to patient care. Accordingly, the Council requests the
8 Commission to consider reviewing the Accreditation Standards for Dental Hygiene Education
9 Programs regarding faculty-to-student ratios and the qualifications of clinical faculty members as
10 requested in the letter.

11 **Action:** The Council directed that written comment be transmitted to the Commission on Dental
12 Accreditation requesting CODA consider proposed revisions to Standard 2-1 of the
13 Accreditation Standards for Dental Assisting Education Programs as noted.

14 **Coalition for Modernizing Dental Licensure:** Dr. Strotman provided an update on the Coalition for
15 Modernizing Dental Licensure (Coalition). Members of the Executive Committee presented at the ADEA
16 Annual Session in March, and the chair of the Coalition presented to multiple state dental associations
17 in recent months as part of membership recruitment efforts. The Coalition currently has 119 member
18 organizations. The Coalition Executive Committee met virtually on February 23, 2022 and in-person on
19 June 9, 2022. At the June 9th meeting, the two At-large members and public member were re-elected to
20 serve one year and three year terms, respectively; the Committee reflected on the trends and
21 significant changes that have occurred in the licensure arena in the last two and a half years and
22 affirmed the Coalition's commitment to its two goals related to initial licensure and licensure portability;
23 and it was confirmed that the full Coalition membership will meet virtually the afternoon of September
24 15, 2022. Finally, the newly reimagined Coalition website, www.dentallicensure.org, will be launched in
25 summer 2022.

26 **Licensure Compacts Update:** Council members who serve on the dental and dental hygiene
27 licensure compact Technical Assistance Group, Dr. Lepowsky, Dr. Nielson and Mr. Cannon, provided
28 an update on the progress of the compact development. It was shared that the Council of State
29 Governments (CSG) worked with the ADA and the American Dental Hygienists' Association (ADHA) to
30 form the Compact Document Team which is composed of 12 members representing state officials,
31 stakeholders and issue experts. The Compact Document Team met for the first time in Washington,
32 D.C. in May 2022 and continues to meet regularly to draft the model compact legislative language.
33 When completed, the draft language will be shared with the Technical Assistance Group (TAG) for
34 review and then circulated to all stakeholders and communities of interest for public comment. At the
35 conclusion of the public comment period, the Compact Document Team and the Technical Assistance
36 Group will review all comments and feedback, and revise and finalize the legislative language. The final
37 compact document is expected to be available for consideration and adoption by states in early 2023.

38 **Testing Agencies Updates:** Dr. Thomas-Moses reminded the Council and its guests of the ADA policy
39 on Licensure. Dr. Thomas-Moses highlighted that the policy calls for the elimination of patients from the
40 licensure examination process and urges states to accept the following three requirements for initial
41 licensure:

- 42 1. Completion of a DDS or DMD degree from a university-based dental education program
43 accredited by the Commission on Dental Accreditation.
- 44 2. Successful passage of the National Board Dental Examination, a valid and reliable written
45 cognitive test.
- 46 3. A determination of clinical competency for the beginning practitioner, which may include:

- 1 • Acceptance of clinical examination results from any clinical testing agency; or
- 2 • Graduation from CODA-accredited PGY-1 program, that is, a residency program at least
- 3 one year in length at a CODA-accredited clinically-based postdoctoral general dentistry
- 4 and/or successful completion of at least one year of a specialty residency program; or
- 5 • Completion of a portfolio-type examination (such as employed by the California Dental
- 6 Board) or similar assessment, that uses the evaluation mechanisms currently applied by
- 7 the dental schools to assess student competence; or
- 8 • An Objective Structured Clinical Examination (OSCE), that is, a valid and reliable non-
- 9 patient based examination consisting of multiple, standardized stations that require
- 10 candidates to use their clinical knowledge and skills to successfully complete one or
- 11 more dental problem-solving tasks.

12 The Council then received an update on activities and changes in the following testing agencies:

13 **CDCA-WREB:** Dr. Miles and Dr. Nielson provided an overview of the Commission on Dental
 14 Competency Assessment and the Western Regional Examining Board (CDCA-WREB) to the Council.
 15 Dr. Miles outlined the difference between the testing agency (CDCA-WREB) and the American Board of
 16 Dental Examiners (ADEX). ADEX is a test development agency, serving its member dental boards in
 17 developing initial licensure examinations for dentistry and dental hygiene professionals. Dr. Miles
 18 emphasized that ADEX does not administer examinations whereas CDCA and WREB are testing
 19 agencies that administer to the ADEX examination. Dr. Nielson provided background information on the
 20 progress of the CDCA-WREB merger and mentioned the agency's name could be changing in the near
 21 future.

22 **CRDTS:** Dr. Edwards, Director of Dental Examinations at Central Regional Dental Testing Service, Inc.,
 23 briefed the Council on the activities of his organization. CRDTS celebrates its 50th year of developing
 24 and administering its examinations, Dr. Edwards mentioned how CRDTS started as a part of ADEX.
 25 The CRDTS exam is very similar to the ADEX due to this past relationship. Dr. Edwards emphasized
 26 that the organization's mission and vision is to help and assist students. CRDTS is taking steps toward
 27 a more compassionate and considerate policy on testing and retakes. They are collaborating with the
 28 dental schools to continue to develop efficient testing modules, with as little disruption in the clinic and
 29 lab as possible. Dr. Edward states they are taking the simulated testing model and trying to make it
 30 equivalent to the patient-based model. A psychometric analysis of the CRDTS simulated exam was
 31 provided to the Council. Dr. Edward highlighted the current goal of the organization is to uphold its
 32 history of excellence while reinventing itself by integrating technology into the examination. The
 33 organization has partnered with a virtual haptic technology company to move forward and possibility
 34 transition from examiner grading models into computer grading models.

35 **CITA:** Dr. McVea, President, Council on Interstate Testing Agencies, delivered a report on the activities
 36 and the history of CITA. He reported that the organization was formed in 2005 by independent states
 37 who formerly administered their own licensure examinations. In 2014, they began administering the
 38 ADEX exam. In 2021, the CITA board voted to join the CDCA-WREB merger. Starting in 2023, CITA
 39 will give the same exam as CDCA-WREB.

40 **JCNDE:** Dr. Waldschmidt's report is detailed earlier in the minutes under the Reports to Council
 41 section.

42 **SRTA:** Dr. Muncy, past president of the States Resources for Testing and Assessments (SRTA),
 43 updated the Council on the activities of SRTA. Dr. Muncy provided a brief history of the agency noting
 44 that it was founded in 1975 and has since moved away from being a regional testing agency as the
 45 name change indicates. The SRTA exam is now accepted in 38 states; SRTA is working to increase
 46 that number. As of October 2021, SRTA is working with a third-party vendor to develop and offer a

1 multimodal examination for licensure which utilizes a stimulator. Dr. Muncy also announced that SRTA
2 recently developed a diagnostic skills examination that will be implemented in the next testing cycle.

3 **Value and ValueS: Navigating the Generational Demographic Shift:** The ADA Communications
4 and Membership staff presented a PowerPoint presentation to the Council titled, "Value and ValueS:
5 Navigating the Generational Demographic Membership Shift." The presentation highlighted the
6 following topics: Current State of ADA Membership, Future State of ADA Membership, Transformation
7 of Value and Values at the ADA, and the Council on Dental Practice Efforts to Champion Change at the
8 ADA. The presentation emphasized the importance of the ADA Board, Council and Committees, ADA
9 Team and States/Locals working together to champion change across the Tripartite with the hopes of
10 addressing membership gaps, specifically with new dentists entering the profession.

11 **Chair and Vice-chair Election for 2022-2023:**

12 **Action:** The Council elected Dr. James D. Nickman to serve as its chair and Dr. Najia Usman to
13 serve as vice chair for 2022-2023.

14 **Admission Test for Dental Hygiene:** Dr. Lepowsky provided the Council with an update on the
15 Admission Test for Dental Hygiene. In April 2020, the Board of Trustees approved formation of the
16 ATDH Steering Committee to oversee development of the Admission Test for Dental Hygiene (ATDH)
17 Program. Dr. Lepowsky shared that since its initial meeting in October 2020, the ATDH Steering
18 Committee made considerable progress in accordance with an expedited development and
19 implementation schedule resulting in the ATDH being officially launched on September 1, 2021.
20 Accordingly, at its April 2022 meeting, the Board of Trustees adopted two resolutions, sun setting the
21 ATDH Steering Committee in recognition of the successful fulfillment of its assigned duties and
22 referring oversight of the ATDH to the Council on Dental Education and Licensure. The Council
23 reviewed and amended the charge to its Dental Admission Testing (DAT) Committee to include matters
24 related to the dental hygiene admission test.

25 **Action:** The Council directed that governance oversight of the Admission Test for Dental
26 Hygiene be assigned to its Dental Admission Testing (DAT) Committee, revising the
27 Committee's charge as follows (additions underlined; deletions ~~stricken~~):

28 The Dental Admission Testing Committee sets direction, establishes policy and
29 oversees research related to both the Dental Admission Test (DAT), Admission Test for
30 Dental Hygiene (ATDH) and the Advanced Dental Admission Test (ADAT). Further, the
31 Committee members review content domains, test specifications and examinee
32 aggregate performance information for the DAT, ATDH and ADAT.

33 The Council also considered and supported expanding the composition of the DAT Committee to
34 include a dental hygiene program representative with experience in the admission process.

35 **Action:** The Council approved the expansion of the composition of the DAT Committee to
36 include a dental hygiene program representative with admissions experience.

37
38 **Action:** The Council directed staff to seek dental hygiene representative nominees willing to
39 serve in this capacity for consideration at its fall Council meeting.

40 **Adjournment:** 10:45 AM Friday, June 17, 2022.

41

42

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Appendices

2

Appendix 1: Revised Application for Recognition as an Interest Area in General Dentistry

3

Appendix 2: Comments Received from Communities of Interest on *Requirements for Recognition of*

4

Dental Specialties and National Certifying Boards for Dental Specialists

5

Appendix 3: Proposed Revisions to *Requirements*

Application for Recognition as an Interest Area in General Dentistry

Council on Dental Education and Licensure
American Dental Association
211 East Chicago Avenue
Chicago, Illinois 60611
2022

ADA American Dental Association®
America's leading advocate for oral health

Introduction

This application specifies the information that must be submitted to the American Dental Association's Council on Dental Education and Licensure by those seeking initial recognition as an interest area in general dentistry. A completed application including an application fee (\$12,200 for 2022) must be submitted to constitute a formal request for Council review of the proposed interest area in general dentistry. The Council will consider only fully completed applications.

Background information

The Governance and Organizational Manual of the American Dental Association delegates to the Council on Dental Education and Licensure the authority to study and make recommendations on the recognition of interest areas in general dentistry, based on the ADA *Criteria for Recognition of Interest Areas in General Dentistry*. The ADA House of Delegates makes the final decision to grant or deny this recognition. Applicants for recognition must demonstrate compliance with the five criteria for recognition in order to be granted recognition as an interest area in general dentistry. This application outlines the process by which interest areas in general dentistry are recognized and identifies the criteria that must be satisfied in order to achieve recognition by the ADA.

It should be noted that the *Criteria* pertain only to the recognition of interest areas in general dentistry. The Association's policies regarding ethical announcement of interest areas in general dentistry and limitation of practice by individual practitioners are contained in its *Principles of Ethics and Code of Professional Conduct*.

The Recognition Process

Upon receipt of an application, the Council Chair and staff screen the application to determine whether all sections have been completed and all appendices referenced in the document have been included. Receipt of a completed application will be acknowledged. Applications that are not fully completed will be returned to the sponsor with notification about suitable modifications. The review process includes opportunities for comments on the application by the profession, as well as committee review, prior to consideration by the Council.

Review Procedures

The Council will place a notice in the appropriate ADA publications, advising the profession of submission of the application and inviting comment. In addition, the following organizations will be notified of receipt of the application:

- Presidents and Executive Directors of:
 - Constituent Dental Societies
 - Recognized Dental Specialty Organizations
 - Recognized Dental Specialty Certifying Boards
 - American Association of Dental Boards
 - American Dental Education Association
 - Academy of General Dentistry
 - State Boards of Dentistry
- Deans, Dental Schools
- Directors, Advanced Dental Specialty Education Programs
- Directors, Advanced General Dentistry Education Programs
- ADA Officers and Board of Trustees
- Members, ADA House of Delegates
- Members and Directors, ADA Councils and Commissions

The application and appendices will be available to the communities of interest on ADA.org.

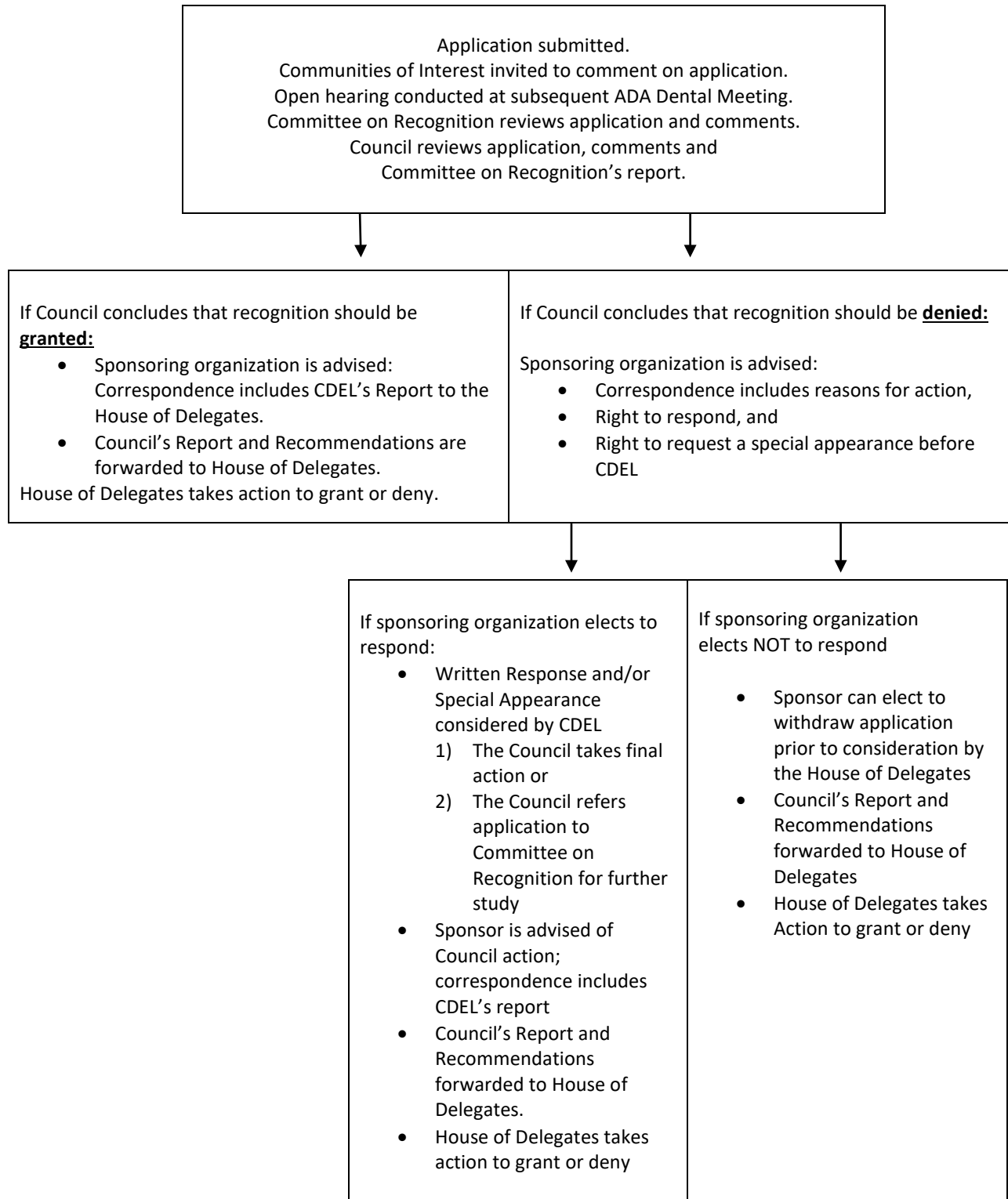
Following receipt of an application for recognition, an open hearing will be conducted at the subsequent annual ADA Dental Meeting, inviting oral testimony and written comment from the broad communities of interest. Comments received from the communities of interest regarding an application for recognition will be posted electronically on ADA.org and be accessible to all interested parties.

The completed application and comments submitted will be considered first by the Council's Committee on Recognition of Dental Specialties and Interest Areas in General Dentistry. The Committee determines its recommendation following in-depth review and discussion of all information provided. Following review of the application and written comments from the broad communities of interest, the Committee reports its findings and recommendation to the Council. The Council concludes whether to recommend granting or denying recognition of the general dentistry interest area. If the Council determines that the applicant has demonstrated compliance with the five criteria for recognition, it will recommend granting recognition by the Association's House of Delegates. In addition, it will advise the sponsor and the House of its recommendation and reasons for its recommendation.

If the Council determines that the sponsor has not demonstrated compliance with the five criteria for recognition, the sponsor is advised of (1) the recommendation and reasons for the recommendation; (2) the sponsor's right to submit a response to the Council's report; and (3) the sponsor's right to a special appearance before the Council to supplement its written response. If the sponsor elects not to respond within the prescribed timeframe, the Council will transmit its detailed report and findings to the Association's House of Delegates. Resolutions transmitted to the Association's House of Delegates are also considered by the ADA Board of Trustees. In its consideration of a resolution, the House is also advised of the Board's comment and recommendation on the resolution. The sponsoring organization may elect to withdraw its application prior to consideration by the Association's House of Delegates.

If the sponsoring organization elects to respond, the Council will take into consideration the sponsor's written response, as well as information provided during a special appearance, before making its final recommendation. If the applicant provides extensive new information in its written response or during the special appearance, the Council can elect to refer the application to the Committee on Recognition for further study. The Council's recommendation for recognition or denial of recognition will then be transmitted through the ADA Board of Trustees to the House of Delegates for final action. The following diagram summarizes the steps in the recognition process.

RECOGNITION PROCESS FOR INTEREST AREAS IN GENERAL DENTISTRY



Application Instructions

General:

The Application for Recognition is structured to collect specific qualitative and quantitative information that will assist the Council on Dental Education and Licensure in determining the extent to which the general dentistry interest area meets the established criteria for recognition.

Format:

The completed application should be submitted in PDF format. Each section of the application should be clearly labeled and the heading and numerical designations of each question indicated. A narrative response with supporting documentation should be provided in response to each question. Bookmarks within the PDF application to organize supporting documentation are encouraged.

Where such supporting documentation is provided, it should be referenced at the end of the narrative statement, clearly labeled and appended to the application.

Responses:

The applicant is expected to respond to all specific requests for information. Individuals responsible for completing the application should review the entire document carefully before completing any part of it. It is not necessary to repeat at length information that can be found elsewhere in the document; cross-referencing information is encouraged.

Some sections of the application request quantitative information. The source of any data provided should be indicated. Estimates may be provided in these sections if definitive statistics are not available, but must include a measure of reliability. However, estimates should be clearly identified and the method for arriving at the estimates should be explained.

Procedures for Reapplication:

If a sponsoring organization withdraws from the process or is denied recognition as a general dentistry interest area:

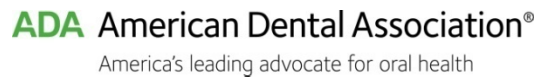
1. A new application may not be submitted until **36 months** after final action on the application has been taken by the House of Delegates or, in the event of voluntary withdrawal, 36 months from the time that action would have been taken by the House of Delegates if the application had not been withdrawn.
2. Resubmission of the application must be in its entirety, including the application fee (\$12,200 for 2022). The applicant is responsible for highlighting new and/or clarifying information since the time of previous submission. Further, the information submitted should address deficiencies noted at the time the application was denied/withdrawn.
3. A revised application will be considered in its entirety as a complete or new application and will include consideration of all sections, not just those sections previously found to be in non-compliance.

Submission of the Completed Application

The completed application, including the Permission to Publish Application form (Appendix 1) and fee should be submitted electronically via email to the Director of the Council on Dental Education and Licensure. Additionally, the application fee should be transmitted via check made payable to the American Dental Association to the Director of the Council.

Director
Council on Dental Education and Licensure
American Dental Association
211 E. Chicago Avenue
Chicago, Illinois 60611
hartk@ada.org

Council staff members are available to answer questions regarding this application and can be reached on the Association's toll-free number: (800) 621-8099, ext. 2698



Application

APPLICATION FOR RECOGNITION OF

(as an Interest Area in General Dentistry)

Application submitted by:

(Sponsor)

(Address)

(City)

(State)

(Zip)

(Signature)

(Contact person)

(Phone number)

(Address)

(City)

(State)

(Zip)

(Email address)

(Date of submission)

Material provided in the application for recognition as an interest area in general dentistry contains statements that represent conclusions of the applicant. Recognition of an interest area in general dentistry by the American Dental Association is based on compliance with established *Criteria* and does not imply concurrence with all of the statements presented in the application.

**APPLICATION FOR RECOGNITION
AS AN INTEREST AREA IN GENERAL DENTISTRY**

Criteria for Recognition of Interest Areas in General Dentistry

- 1. The existence of a well-defined body of established evidence-based scientific and clinical dental knowledge underlying the general dentistry area - knowledge that is in large part distinct from, or more detailed than, that of other areas of general dentistry education and practice and any of the dental specialties recognized by the National Commission on Recognition of Dental Specialties and Certifying Boards.**
 - a. Provide the definition and scope of the general dentistry area
 - b. Provide the educational goals and objectives of the general dentistry area
 - c. Provide the competency and proficiency statements for the general dentistry education area.
 - d. Provide a list of the specific areas of clinical practice, or procedures which you recognize as the essential components of the specific interest area in general dentistry in consideration.
 - e. Describe how scientific dental knowledge in the area is substantive and distinct from other general dentistry areas

- 2. The body of knowledge is sufficient to educate individuals in a distinct advanced education area of general dentistry, not merely one or more techniques.**
 - a. Identify the distinct components of biomedical, behavioral and clinical science in the advanced education area
 - b. Describe why this area of knowledge is a distinct education area of general dentistry, rather than a series of just one or more techniques
 - c. Provide documentation demonstrating that the body of knowledge is unique and distinct from that in other education areas accredited by the Commission on Dental Accreditation
 - d. Provide documentation of the complexity of the body of knowledge of the general dentistry area by identifying specific advanced techniques and procedures, representative samples of curricula from existing programs, textbooks and journals

- 3. The existence of established advanced educational programs with structured curricula, qualified faculty and enrolled individuals for which accreditation by the Commission on Dental Accreditation can be a viable method of quality assurance.**
 - a. Describe the historical development and evolution of educational programs in the area of advanced training in general dentistry
 - b. Provide a listing of the current operational programs in the advanced general dentistry training area, identifying for each, the:
 - i. Sponsoring institution;
 - ii. Name and qualifications of the program director;
 - iii. number of full-time and part-time faculty (define part-time for each program);
 - iv. Curriculum (course outlines, student competencies, class schedules);

- v. Outcomes assessment method;
- vi. Minimum length of the program;
- vii Certificate and/or degree awarded upon completion;
- viii number of enrolled individuals per year for at least the past five years*;
and
- ix. Number of graduates per year for at least the past five years.*

*If the established education programs have been in existence less than five years, provide information since their founding.

- c. Document how many programs in the education area would seek voluntary accreditation review, if available.
4. **The education programs are the equivalent of at least one 12-month full-time academic year in length. The programs must be academic programs sponsored by an institution accredited by an agency recognized by the United States Department of Education or accredited by the Joint Commission on Accreditation of Healthcare Organizations or its equivalent rather than a series of continuing education experiences.**
- a. Document the minimum length of the program for full-time students
 - b. Provide evidence that a certificate and/or degree is awarded upon completion of the program
 - c. Provide copies of the program's recruitment materials (e.g., bulletin, catalogue)
 - d. Provide other evidence that the programs are bona fide higher education experiences, rather than a series of continuing education courses (e.g., academic calendars, schedule of classes, and syllabi that address scope, depth and complexity of the higher education experience, formal approval or acknowledgment by the parent institution that the courses or curricula in the education area meet the institution's academic requirements for advanced education)
5. **The competence of the graduates of the advanced education programs is important to the health care of the general public.**
- a. Describe the need for appropriately trained individuals in the general dentistry area to ensure quality health care for the public
 - b. Describe current and emerging trends in the general dentistry education area
 - c. Document that dental health care professionals currently provide health care services in the identified area
 - d. Provide evidence that the area of knowledge is important and significant to patient care and dentistry
 - e. Document that the general dentistry programs comply with the ADA *Principles of Ethics and Code of Professional Conduct*, as well as state and federal regulations



**COUNCIL ON DENTAL EDUCATION AND LICENSURE
PERMISSION TO PUBLISH APPLICATION
for Recognition as an Interest Area in General Dentistry**

The American Dental Association (“ADA”), through its Council on Dental Education and Licensure, makes recommendations on the recognition of general dentistry interest areas and in that capacity obtains applications for recognition of interest areas in general dentistry including exhibits and supplemental material (the “Application”). The undersigned hereby grants its full permission and authorization to ADA to republish, post and otherwise use or make available the application in various ADA publications, including but not limited to ADA’s website currently located at www.ada.org. Furthermore, the undersigned consents to the reproduction, display, transmission and use of the Application by ADA on a perpetual basis, worldwide, without charge, in any media now existing or hereafter created, including without limitation brochures, periodicals, Internet, Intranet, websites and CD-ROMs, and to receive or otherwise use the Application in electronic format as well as print or any other media.

The undersigned, for itself and all its agents, assigns and successors, hereby waives all rights to any consideration, whether by payment of money or otherwise, for time and expenses, and for the reproduction, display, transmission and use of the Application. Further, the undersigned, for itself and all its agents, assigns and successors, hereby releases and forever discharges ADA and its permittees, their respective subsidiaries, affiliates, officers, trustees, directors, employees, agents, insurance carriers, predecessors, successors, heirs and assigns, and any others acting with their permission or under their authority from: (1) any and all claims arising out of the foregoing, including but not limited to any claims for blurring or distortion or for failure to exercise such right to use the Application; and (2) any and all past and present claims, demands and causes of action of any nature whatsoever that we had, have or may hereafter claim to have, whether directly or indirectly, whether based on statute, tort, contract or otherwise, whether known or unknown, suspected or unsuspected, foreseen or unforeseen, liquidated or unliquidated, asserted or unasserted, arising in connection with the activities described above.

IN WITNESS WHEREOF, the undersigned, through its duly authorized representative, has executed this Agreement on this ____ day of _____, 2022.

Name of Sponsor

Signature: _____

Title: _____

Comment Number	Date Comment was Received	Name of Individual/Organization Submitting Comment	Section Being Referenced in Requirements for Recognition
1	2/14/2022	Clarita Scioscia Executive Director, ABOMP (On behalf of American Board of Oral and Maxillofacial Pathology)	Operation of Boards; Requirement 5; Supports proposed change from "encourage" to "require"
2	2/15/2022	Dr. Jim Phillips President Alabama Dental Association	Operation of Boards; Requirement 5; Supports proposed change from "encourage" to "require"
3	3/11/2022	Keith A. Mays Chair of the Board, ADEA and Karen P. West President & CEO, ADEA (On behalf of the American Dental Education Association)	Operation of Boards; Requirement 5; Agree overall with the revision to require lifelong learning and continuous quality improvement, but there appears to be less specificity as to what fulfills this expectation and how compliance will be monitored.
4	3/23/2022	Charles A. Powell President, ABP and Eileen G. Loranger Executive Director, ABP (On behalf of The American Board of Periodontology)	Operation of Boards; Requirement 5; ABP proposes the following: "Each Board shall encourage <u>require</u> its diplomates to engage in lifelong learning and shall encourage continuous quality improvement."
5	3/28/2022	Reginald W. Taylor, DMD, DMSc Associate Professor Director of Pre-Doctoral Orthodontics Texas A & M College of Dentistry	Page 1, line 18 – Change, “may” be established... to “must” be established... Changing this to a "must" statement gives more consistency with the remainder of the document. Page 2, line 46 – insert “academic,” so the phrase reads, “at least two academic years...” This change makes the sentence consistent with that on page 5, line 111. Page 3, line 78 – change “should” to “must.” Only those who have taken some form of the certifying examination should participate in the administration of the examination.

6	3/29/2022	Alan S. Law President, AAE and Bradford Johnson Secretary, ABE (On behalf of the American Association of Endodontics and American Board of Endodontics)	Operation of Boards; Requirement 5; AAE and ABE proposes the following: "Each board shall <u>encourage require</u> its diplomates to engage in lifelong learning, <u>and to encourage</u> continuous quality improvement."
7	3/29/2022	Frank J. Tuminelli Chair NCRDSCB (On behalf of the National Commission on Recognition of Dental Specialties and Certifying Boards)	Introduction to the Requirements for Recognition; Requirements for Recognition of Dental Specialties: Requirement 1; Requirement 2; Requirement 3; Requirement 4; Requirement 5; Requirement 6; Requirements for Recognition of National Certifying Boards for Dental Specialists: Introduction; Organization of Boards: Requirement 1; Requirement 2; Requirement 3; Requirement 4; Operation of Boards: Requirement 1; Requirement 2; Requirement 3; Requirement 4; Requirement 5; Requirement 6; Requirement 7; Requirement 8; Certification Requirements: Requirement 1; Requirement 2; Requirement 3.
8	4/1/2022	Christopher R. Richardson DMD, MS President AAP (On behalf of the American Academy of Periodontology)	Operation of Boards; Requirement 5; AAP proposes the following: "Each Board shall <u>encourage require</u> its diplomates to engage in lifelong learning and <u>shall encourage</u> continuous quality improvement."

From: [Clarita Scioscia](#)
To: [Puzan, Annette](#)
Subject: RE: CDEL- 2022 Call for Comment on Requirements for Recognition
Date: Monday, February 14, 2022 1:35:44 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Annette,

The American Board of Oral and Maxillofacial Pathology approves the proposed change from “encourages” to “requires”.

Most Sincerely,

Clarita Scioscia

TDAC Coordinator, American Board of Pathology
Executive Director, American Board of Oral & Maxillofacial Pathology
(813) 286-2444 x 230
abpath.org

One Urban Centre, Suite 690
4830 West Kennedy Blvd.
Tampa, FL 33609-2518



Disclaimer - This message is intended only for the recipients named above. If you are not the intended recipient, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Puzan, Annette <puzana@ada.org>
Sent: Thursday, February 10, 2022 2:46 PM
To: Puzan, Annette <puzana@ada.org>
Subject: CDEL- 2022 Call for Comment on Requirements for Recognition

Please see the attached Call for Comment sent on behalf of Dr. Donna Thomas-Moses, chair of the Council on Dental Education and Licensure.

Annette Puzan, MBA puzana@ada.org
Manager, Dental Education & Licensure
EDUC
312.440.2703

American Dental Association 211 E. Chicago Ave. Chicago, IL 60611 www.ada.org

From: [Dr Jim Phillips](#)
To: [Puzan, Annette](#)
Subject: Re: CDEL- 2022 Call for Comment on Requirements for Recognition
Date: Tuesday, February 15, 2022 1:01:15 PM

Annette, I like the change in item 5. Jim Phillips, Jr. DMD

On Thu, Feb 10, 2022 at 1:40 PM Puzan, Annette <puzana@ada.org> wrote:

Please see the attached Call for Comment sent on behalf of Dr. Donna Thomas-Moses, chair of the Council on Dental Education and Licensure.

Annette Puzan, MBA puzana@ada.org
Manager, Dental Education & Licensure
EDUC
312.440.2703

American Dental Association 211 E. Chicago Ave. Chicago, IL 60611 www.ada.org

March 14, 2022

American Dental Association
Council on Dental Education and Licensure

Dear Dr. Thomas-Moses,

Thank you for the opportunity for ADEA to provide comment on the *ADA Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists*.

In reviewing the requirements used by the National Commission on Recognition of Dental Specialties and Certifying Boards, we have the following comments to provide:

Specifically related to the proposed revision noted under Requirement 5 – Operation of Boards, while we agree overall with the revision to require lifelong learning and continuous quality improvement, there appears to be less specificity as what fulfills this expectation and how compliance will be monitored.

For example Operations of Boards: Requirement 2 (lines 84-86) specifies “. . . at least one examination in each calendar year and shall announce such examination at least six months in advance”; Requirement 4 lists in detail what must be submitted annually to the National Commission – “data relative to its financial operations, applicant admission procedures, and examination content and results,” and so forth in other operation of board requirements as to expected, measurable outcomes.

How will the National Commission determine if the intent of requiring diplomates to engage in lifelong learning and continuous quality improvement has been met? What burden will be placed on the specialty boards, and will there be monitoring via the licensure process?

Thank you for your consideration of these comments and concerns. We appreciate the opportunity to provide our comments.

Keith A. Mays, Ph.D., D.D.S., M.S.
Chair of the Board

Karen P. West, D.M.D., M.P.H.
President and CEO

cc: Ms. Annette Puzan, manager, Dental Education and Licensure, Council
on Dental Education and Licensure



March 23, 2022

Dr. Donna Thomas-Moses, Chair
Council on Dental Education and Licensure
American Dental Association
211 E. Chicago Ave
Chicago, IL 60611

Dear Dr. Thomas-Moses:

Thank you for providing an opportunity for comments on the *Requirements for Recognition* used by National Commission on Recognition of Dental Specialties and Certifying Boards. The *Requirements for Recognition of Dental Specialties and National Certifying Board for Dental Specialists* governs the work of the American Board of Periodontology (ABP) and, as such, the ABP Board of Directors appreciates the opportunity to provide comments.

The Requirements for Recognition document presented included one proposed edit. The ABP respectfully requests a modification to that edit. Specifically, the ABP requests the following modification to Operations of Boards paragraph 5:

*“Each Board shall **encourage require** its diplomates to engage in lifelong learning and **shall encourage** continuous quality improvement.”*

The ABP recognizes that lifelong learning is a fundamental component of board certification and requires ABP diplomates to adhere to maintenance of certification requirements every six years. In addition, the ABP Board of Directors recently developed a task force to review all aspects of its maintenance of certification process. Continuous quality improvement, as a mandated requirement, though, does not have a universal definition and does not lend itself to evaluative standards. The proposed edit, noted above, provides support for both concepts while also making enforcement and standards possible.

The ABP Board of Directors noted that the call for comment includes the opportunity to comment on all aspects of the *Requirements for Recognition*, not just the proposed edit presented. The ABP respectfully requests that no further edits to the *Requirements for Recognition* be adopted at this time. The *Requirements for Recognition* provide clear guidance for specialties and specialty boards and are sufficient as written. Should additional comments or edits be presented, it is hoped that review and comment shall be allowed.

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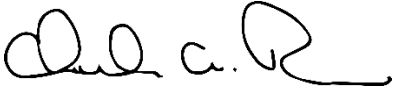
Jeffrey A. Rossmann, DDS., MS
Director, Examinations

Barbara Robinette
Credentialing Program Manager

March 23, 2022
Page Two

Thank you, again, for the opportunity to comment on the *Requirements for Recognition*.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles A. Powell". The signature is fluid and cursive, with a large, stylized initial "C" and "P".

Charles A. Powell
President



3302 Gaston Avenue
Dallas, Texas 75246
Phone: 214.828.8125
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Email: RWTaylor@tamu.edu

Department of Orthodontics

March 23, 2022

RE: Call for Comment on *ADA Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists*

Dear Council on Dental Education and Licensure:

The purpose of this communication is to submit comments on the *Requirements for Recognition*. Please see comments below:

Page 1, line 18 – Change, “may” be established... to “must” be established... Changing this to a “must” statement gives more consistency with the remainder of the document.

Page 2, line 46 – insert “academic,” so the phrase reads, “at least two academic years...” This change makes the sentence consistent with that on page 5, line 111.

Page 3, line 78 – change “should” to “must.” Only those who have taken some form of the certifying examination should participate in the administration of the examination.

Sincerely,

A handwritten signature in black ink that reads 'Reginald W. Taylor'. The signature is written in a cursive style with a large, prominent 'R' and 'T'.

Reginald W. Taylor, D.M.D., D.M.Sc.
Associate Professor
Director of Pre-Doctoral Orthodontics
AAO Representative to CDEL

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Timothy C. Kirkpatrick,
D.D.S.



March 29, 2022

Dr. Donna Thomas-Moses, Chair
Council on Dental Education and Licensure
c/o Ms. Annette Puzan
American Dental Association
Via email to: puzana@ada.org

Dear Dr. Thomas-Moses,

Thank you for inviting the American Association of Endodontists and the American Board of Endodontics to comment on the proposed revision to the *Requirements for Recognition* which would require that recognized certifying boards “require” rather than “encourage” Diplomates to engage in lifelong learning and continuous quality improvement.

The American Board of Endodontics does presently require that Diplomates earn continuing education credits in order to maintain their Board certification, and the ABE and AAE are both supportive of all specialists engaging in lifelong learning. Although we support both the concept of lifelong learning and continuous quality improvement, we feel continuous quality improvement is more nebulous and difficult to measure. We propose the following substitute wording for 5) under the *Operation of Boards* section:

“Each board shall require its diplomates to engage in lifelong learning, and to encourage continuous quality improvement.”

The ABE does have Board certified endodontists who were grandfathered in as Diplomates and are thus not required to report CE credits. The ABE implemented the Recertification requirement (CE) for those Diplomates who began the process with submission of their Preliminary Application after 1996. Therefore, although we support this change in general terms, we would request that such a change to the *Requirements for Recognition* would not impact this particular group of endodontists who submitted their Preliminary Application prior to December 31, 1996.

We have no further proposed edits for the other requirements detailed in the document. If any recommended changes are made by other organizations, we respectfully ask to be able to review those prior to an official adoption.

Thank you again for requesting our input and please do not hesitate to contact us if further information is needed.

Sincerely,

Alan S. Law, D.D.S., Ph.D.
AAE President

Bradford Johnson, D.D.S., M.H.P.E.
ABE Secretary



National Commission on Recognition of
Dental Specialties and Certifying Boards

211 E. Chicago Ave. Chicago, Illinois
60611 T 312.440.2697 • Fax
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March 29, 2022

Dr. Donna Thomas-Moses
Chair
Council on Dental Education and Licensure
211 E. Chicago Avenue
Chicago, IL 60611

Dear Dr. Thomas-Moses,

The National Commission appreciates the opportunity to provide comments on the proposed revisions to the *Requirements for Recognition for Dental Specialties and National Certifying Boards for Dental Specialists*. The National Commissions proposed revisions (**Appendix 1**) are editorial in nature to provide greater clarity to the *Requirements for Recognition* and do not change the Councils original intent. Over the past four (4) years, the National Commission has had the opportunity to utilize the *Requirements for Recognition* to recognize three new dental specialties and three new specialty certifying boards, along with conducting the ten-year periodic review of the specialties. Based on this significant experience, the National Commission has been able to identify proposed revisions which will address recurring *Requirements* interpretation issues with the applicants, the current recognized specialties, and the National Commission itself. Through its proposed revisions to the *Requirements for Recognition*, the National Commissions goal is to make the requirements more complete, understandable and thorough. The National Commission understands that while flexibility in interpretation of the *Requirements for Recognition* is desirable, the experience utilizing the *Requirements* to make recognition decisions has highlighted those are areas of the *Requirements* that need to be further clarified to strengthen the process.

Introduction to the Requirements for Recognition- Page 1, Appendix 1

The National Commission determined the proposed revisions provide a simple and proper understanding of the purpose of the *Requirements for Recognition*, adds proposed language identifying what makes each of the specialties unique, identifies that the *Requirements for Recognition* pertain to both proposed and the recognized specialties and certifying boards and properly identifies the specialties as disciplines in dentistry rather than the outdated terminology “area of dentistry”. Further, the National Commission determined that because the *Requirements for Recognition* are criteria directed at specialty recognition, any reference to general practice is not appropriate.

Lines 12-16: Add the words “The *Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists* contain criteria that specialty applicants and the recognized specialty sponsoring organizations and certifying boards must meet in order to become and/or remain recognized by the National Commission on Recognition of Dental Specialties and Certifying Boards (National Commission)”. The National Commission determined this language simply and properly summarizes the true purpose of the *Requirements for Recognition*.

Lines 18-19: Strike the words “an area” and add the words “a discipline” because this is currently accepted terminology and areas of dentistry is no longer in use. Add the words “that has a separate, distinct and well-defined focus based on unique advanced knowledge, skills and training”. The National Commission determined that the addition of this language is important because it clearly identifies what makes each of the specialties unique from any other discipline in dentistry.

Line 19: Strike the word “has” and add the word “have” because it makes the sentence grammatically correct.

Lines 20-21: Strike the words “on Recognition of Dental Specialties and Certifying Boards” because on line 16 in National Commission’s proposed revisions, the National Commission has been properly identified as the National Commission; therefore, it is not necessary to repeat the entire name of the National Commission.

Lines 23-24: Add the words “in disciplines of dentistry in which advanced knowledge, skills and training are essential to maintain or restore oral health” to clarify what makes the specialties unique. Strike the words “It is the”.

Lines 25-27: Strike the words “Association’s belief that the needs of the public are best served if the profession is oriented primarily to general practice. Specialties are recognized in those areas where advanced knowledge and skills are essential to maintain or restore oral health”. This editorial comment is not pertinent to the purpose of the document.

Lines 29-32: Strike the words “Not all areas in dentistry will satisfy the requirements for specialty recognition. However, the public and professional substantially when non-specialty groups develop and advance areas of interest through education, practice and research. The contributions of such groups are acknowledges by the profession and their endeavors are encouraged”. The National Commission prefers the more direct language inserted beginning on line 34 and as previously stated because the *Requirements for Recognition* are written for and about the specialties, language related to non-specialty groups is not pertinent to the document. Further, it appears to the National Commission that there is some cross-over into the *Requirements for Recognition* related to areas of interest that are acknowledged by the Council; therefore, the language is not appropriate.

Lines 34-38: Add the words “Not all disciplines in dentistry will satisfy the requirements for specialty recognition and there should be no expectation that all disciplines in dentistry will meet the *Requirements for Recognition of Dental Specialties*. Disciplines of dentistry that are not currently recognized as a specialty by the National Commission and believe they can meet **all** of the *Requirements for Recognition of Dental Specialties*”. This amendment by substitution better defines how the National Commission functions and sets realistic expectations for the dental community. Not all disciplines in dentistry should have an assumption of meeting the *Requirements for Recognition*.

Line 38: Strike the words “The sponsoring organization must” and add the words “should contact the”.

Line 39: Add the words “National Commission for a formal Application for Specialty Recognition” because that is the proper name of the National Commission’s document. Strike the words “submit to the National” because proposed language has been added earlier in the sentence.

Lines 40-41: Strike the words “Commission on Recognition of Dental Specialties and Certifying Boards a formal application which demonstrates compliance with all the requirements for specialty recognition” because proposed language has been added to lines 34-39 to address this.

Line 41: Add the word “When”.

Introduction to the Requirements for Recognition-Page 2, Appendix 1

Lines 42-43: Add the words “making decisions related to specialty recognition, the National Commission will only determine compliance with the criteria outlined in the *Requirements for Recognition*”. The National Commission determined it is important to clarify that decisions related to specialty recognition will be only be based on compliance with the criteria outlined in the *Requirements for Recognition*.

Line 45: Add the words “If a discipline of dentistry is granted specialty recognition by the National Commission” because the proposed language properly sets in place next steps and expectations.

Lines 46: Strike the words “Following recognition of a specialty by the National Commission on Recognition of Dental” because the National Commission has been properly identified on line 16 as the National Commission; therefore, there is no need to have the National Commission’s long name referenced.

Line 47: Strike the words “Specialties and Certifying Boards” because the National Commission has been properly identified on line 16 as the National Commission; therefore, there is no need to have the National Commission’s long name referenced.

Line 48: Strike the word “may” and add the word “must” because having a certifying board recognized is not optional.

Lines 49: Strike the words “as specified in this document” because the language is not necessary and add the words “and recognized by the National Commission as the national certifying board for the specialty” because it properly describes the process being following.

Lines 52-53- Strike the words” Association policies regarding ethical announcement of specialization and limitation of practice are contained in the ADA Principles of Ethics and Code of Professional Conduct”. The ethical announcement of specialization and limitation of practice is not relevant to the *Requirements for Recognition*, is related to a different set of ADA policies and is not under the purview of the National Commission.

Requirements for Recognition of Dental Specialties- Page 3, Appendix 1

Introduction

The National Commission determined that the proposed revisions are pertinent to the introduction and editorially correct by adding proposed language that properly identifies the specialties as disciplines of dentistry and not “an area of dentistry”. Further, because the *Requirements for Recognition* are for both proposed specialties and the recognized specialties, the National Commission has determined that it is important to identify both.

Line 56: Strike the words “for” and “an area” and add the words “in a discipline of dentistry” because it identifying the specialties as areas of dentistry is an outdated term.

Line 57: Add the words “that is not currently recognized as a dental specialty” and “be able to provide” and add an “ed” on to the word “document”. The National Commission determined that the proposed revision adds clarity to the statement.

Line 58: Add the word “evidence”, strike the word “requirements” and add the words “*Requirements for Recognition of*” because it properly identifies the name and section of the *Requirements for Recognition*.

Lines 59-61: Add the words “*Dental Specialties*” and add the words” Specialty sponsoring organizations recognized by the National Commission must be able to show continued compliance with the *Requirements for Recognition* specified in this section”. The National Commission determined that this proposed revision appropriately identifies the expectation that once specialty

recognition has been granted, the specialty sponsoring organizations must remain in compliance at all times.

Requirement 1

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 1* and adds proposed language that identifies the specialties as disciplines of dentistry instead of an area of dentistry. Further, because the *Requirements for Recognition* are for both proposed specialties and the recognized specialties, the National Commission has determined that it is important to identify both.

Line 63: Strike the words “an area” and add the words “a discipline of dentistry”, which is the proper identification of the specialties.

Line 65: Strike the word “that” and add the word “the” because the sentence is grammatically incorrect.

Line 67: Add the word “have” and strike the word “have” later in the sentence.

Line 68: Add the words “that is a minimum of two (2) years in length” because it provides clarity that in order to be recognized as a specialty the advanced education programs accredited by the Commission on Dental Accreditation must be at least two (2) years in length as stated in Requirement 6.

Line 69: Strike the word “that” and add the word “the” because the sentence is grammatically incorrect.

Line 70: Add the words “educational and/or practice” because it clarifies the expectation and strike the word “that” and add the word “the” because the sentence is grammatically incorrect.

Line 71- Add the words “through written criteria established” because it clarifies the expectation that specific language must be placed and properly recorded.

Lines 72-76- Add the words “if the sponsoring organization is not recognized by the National Commission. The recognized specialty sponsoring organization must continue to have a recognized certifying board that continually meets the *Requirements for Recognition of National Certifying Boards for Dental Specialists* in order to remain recognized”. The National Commission determined the proposed revision provides clarity to the requirement and addresses the fact that specialty recognition is a two-step process, and that in order for a specialty sponsoring organization to remain recognized, there must be a recognized certifying board that must remain in compliance with the *Requirements for Recognition of National Certifying Boards for Dental Specialists*.

Requirement 2

The National Commission determined that the proposed revisions clarify *Requirement 2* and identifies that the *Requirements for Recognition* are for both proposed and recognized specialties.

Line 78: Add the words “and a recognized specialty” because the *Requirements for Recognition* are for both proposed and the recognized specialties.

Line 79: Strike the word “which”, add the word “that” because the sentence is grammatically incorrect, add the word “advanced”, add the words “skills and training” and strike the words “and skills” because the proposed revisions clarify what is required to show compliance with this requirement.

Requirement 3

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 3* and identifies that the *Requirements for Recognition* are for both proposed and recognized specialties.

Line 84: Add the words “of practice” because it clearly identifies what “scope” is referencing. Strike the word “the” and add the word “a” because the sentence is not grammatically correct. Add the words “and a recognized specialty” because the *Requirements for Recognition* also apply to the recognized specialties.

Line 85: Add the word “skills” and strike the “skills” later in the sentence and add the word “training” because it clarifies expectations and compliance with the Requirement.

Line 86: Add the words “with minimal overlap”, strike the word “from”, add the word “in”, add the word “skills” and strike the word “skills” later in the sentence and add the word “training”. The National Commission determined that it is paramount to add language related to minimal overlap because it adds definition to the Requirement. While the National Commission acknowledges the fact that there is some overlap between the recognized specialties, the expectation is that this overlap is minimal.

Line 88: Strike the word “a”, add the words “any of the”, strike the word “specialty” and the word “specialties”. The National Commission determined that the proposed language properly identifies all of the recognized specialties.

Requirement 4

The National Commission believes this requirement has presented several interpretation issues from both applicants and the National Commission itself. The National Commission determined that the proposed revisions for items b, c, and d address the National Commissions concerns while providing direction to potential applicants. Further, because the *Requirements for Recognition* are for both proposed and the recognized specialties, it is important to identify both.

Line 90: Strike the word “The”, add the words “A proposed”, strike the word “applicant” and add the words “and a recognized specialty”. The National Commission determined that the word “applicant” should be stricken because it is not consistent with how proposed specialties have been identified in the document. Further, the National Commission determined that it is important to identify both proposed and the recognized specialties.

Line 92: Strike the words “professional education” and add the word “the”.

Line 93: Add the words “educational needs of the discipline at the predoctoral, postdoctoral and continuing”. The National Commission understands that the *Requirements for Recognition* are not to be prescriptive; however, as this Requirement is currently written it is vague and needs to provide proposed and the recognized specialties with more guidance so that they clearly understand what the expectation is and how to achieve compliance.

Line 94: Add the words “education level”, strike the words “contributes to”, add the words “engages in”, strike the words “needs of the profession” and add the word “that”. The National Commission determined the proposed revision provides more guidance to proposed specialties and the recognized specialties so that they can understand what the expectation is and how compliance can be reached.

Line 95: Add the words “establishes evidence-based validity of therapy used by practitioners in the”. The National Commission determined the proposed revision provides proposed and the recognized specialties with a more guidance so that they clearly understand what the expectation is and how to achieve compliance.

Line 96: Add the words “proposed/recognized specialty” and strike the words “provides oral health services in the field of study”.

Line 97: Strike the words “the public” and add the words “demonstrates a need for service that is not currently being met by general” to provide greater clarity to requirements.

Requirement 4 Continued on Page 4, Appendix 1

Lines 98-100: Add the words “practitioners or any of the recognized dental specialties” and strike the words “each of which the specialty applicant must demonstrate would not be satisfactorily met except for the contributions of the specialty applicant”. The National Commission determined that the proposed revisions in lines 90-97 are adequate; therefore, the language is redundant.

Requirement 5

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 5* and because the *Requirements for Recognition* are for both proposed and the recognized specialties, the National Commission determined it is important to maintain consistency throughout the document when identifying both proposed and the recognized specialties.

Line 102: Add the words “and a recognized specialty”, strike the word “directly” and add the words “have a direct” and add the word “impact” because not only does a specialty need to have a direct benefit on patient care, it also needs to have an impact in order to be recognized.

Line 103: Strike the words “some aspect of”, add the word “on” and add the words “and meet the needs of its patient population”. The National Commission determined that in order to be a recognized specialty, the discipline must be able to meet the needs of its patient population. If the needs of a patient population are being met by general dentists or any of the other recognized specialties, there is no need to have a specialty that is not needed by the patient population.

Requirement 6

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 6* and because the *Requirements for Recognition* are for both proposed and the recognized specialties, it is important to identify both.

Line 105: Add the words “A proposed specialty and a recognized specialty must have”, strike the word “Formal” and add the word “formal” because it is important to identify both proposed and recognized specialties.

Line 106: Add the words “accredited by the Commission on Dental Accreditation that are a”

Lines 107-109: Add the words “minimum of two (2) years in length and strike the words “of at least two years accredited by the Commission on Dental Accreditation must exist to provide the specialty knowledge and skills required for practice of the proposed specialty” because proposed language has been added elsewhere in the Requirements to address this.

Requirements for Recognition of National Certifying Boards for Dental Specialists
Page 5-Appendix 1

Introduction

The National Commission determined the proposed revisions underscore the intent of the introduction. The National Commission questions why the introduction states that “a national certifying board shall have a sponsoring organization that meets all of the elements of Requirement (1) of the *Requirements for Recognition of Dental Specialties*”, because in order to become and remain recognized by the National Commission, the sponsoring organization must remain in compliance with all six (6) of the *Requirements for Recognition of Dental Specialties*. Further, because the *Requirements for Recognition* are for both proposed and the recognized certifying boards, it is important to identify both.

Line 115: Strike the word “on”.

Line 116: Strike the words “Recognition of Dental Specialties and Certifying Boards” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 117: Strike the word “shall”, add the word “must” and add the word “recognized”. The definition of the word “shall” is expressing the future tense and is not the proper word choice. Further, adding the word “must” makes the statement stronger.

Line 118: Strike the words “elements of Requirement (1) of the” because the recognized specialty sponsoring organization must be in compliance with all six (6) *Requirements for Recognition* in order to remain recognized.

Line 119: Strike the word “shall” and add the word “must” because the close working relationship is not option and it must occur and an add the word “recognized”.

Lines 120-124- Add the words “A certifying board seeking recognition must be able to provide documented evidence showing that it satisfies all the *Requirements for Recognition of National Certifying Boards for Dental Specialists* specified in the section. Certifying boards recognized by the National Commission must be able to show continued compliance with all of the *Requirements for Recognition* specified in this section. The National Commission determined this provides clarity to the requirement.

Line 124: Strike the word “Additionally” because it is not needed.

Line 125- Strike the words “the following requirements must be fulfilled” because the language is not necessary.

Organization of Boards

Requirement 1:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 1*. Further, because the *Requirements for Recognition* are for both proposed and the recognized certifying boards it is important to identify both.

Line 129: Strike the word “Each”, add the words “Applicant certifying boards and the recognized certifying boards” because it is important to identify both, strike the word “Boards”, add the word “boards” and strike the word “shall” and add the word “must”. The National Commission determined that because meeting and/or maintaining compliance with the Requirement is not optional, the word “must” is stronger and clarifies that it is not optional.

Line 130- Add the number “(5)”, strike the word “or”, add the words “and no”, add the word “twelve” and add the word “officers”. The National Commission determined that because some boards call their board members directors and some call them officers, the addition of the word “officer” encompasses current identification of the Board of Directors.

Line 132: Strike the words “on Recognition of Dental Specialties and Certifying Boards” because National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 133- Add the word “National” because it is the proper reference of the National Commission, strike the word “prescribes” and replace with the word “recommends” because the National Commission does not “prescribe” anything, it makes recommendations.

Line 134- Add the word “officers”, strike the word “member” and add the words “directors/officers”.

Line 135- Add the word “cumulative” to provide clarity because there have been recognized certifying boards that have questioned whether the term was cumulative. Add the number “(9) and strike the words “Membership on the board shall be in accordance with”.

Line 136- Strike the words “with a prescribed method endorsed by the sponsoring organization” because as outlined in Operation of the Boards Requirement 7, the certifying board has full responsibility for conducting its certification program; therefore, any language related to the sponsoring organization endorsing how the certifying board establishes its Board of Directors is in conflict with the certifying board being an independent entity. Strike the word “board” and add the word “voting” because it provides clarity that all voting directors must be diplomates.

Line 137: Add the word “officers”, strike the word “shall” add the word “must”, add the words “specific certifying” and strike the word “only”. The National Commission determined that the word directors and officers are used interchangeably by the recognized certifying boards and the addition of the word “must” makes the requirement stronger.

Line 138- Strike the words “sponsoring organizations of”, add the word “certifying” and strike the “s” in the word “boards”.

Line 139- Add the word “criteria” because criteria and qualifications are used interchangeably by the recognized certifying boards.

Requirement 2:

The National Commission determined that the proposed revisions provide better understanding of *Requirement 2*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission determined that it is important to identify both. Further, the National Commission determined it was important to add language related to the “close working relationship” between the recognized sponsoring organization and the proposed/recognized certifying board.

Line 141: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying”, strike the “s” in “boards” and strike the words “shall submit in”. The National Commission determined that it is proper to identify both proposed and the recognized certifying boards. Further, the use of the word “shall” is not proper based on its definition and the word “must” clarifies that this is an absolute requirement and not an option.

Line 142: Strike the words “writing to the National Commission”, add the words “must have” and strike the words “on Recognition of Dental Specialties” because proposed and the recognized certifying boards understand that they are working with the National Commission and National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 143: Strike the words “Certifying Boards” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced. Add the word “certification” because that properly identifies the program the certifying boards are conducting”, add the words “that is” and strike the word “sufficiently” because the expectation is that the certifying boards certification program is comprehensive in scope, and add the word “and”.

Line 144: Add the words “needs of the diplomate practitioners in the recognized specialty, the profession” because it clarifies the role of the certifying board and the intended audience.

Line 145: Add the words “and protects the public” because it clarifies the role of certifying board and strike the words “requirements established by the American Dental Association” because the proposed and recognized certifying boards understand that the National Commission has not been given the authority to draft the *Requirements for Recognition*.

Lines 146-148: Strike the words “for the operation of a certifying board. This statement should include evidence of sponsorship of a boards by a national organization that meets all elements of” because the language is repetitive and not necessary.

Line 148: Strike the words “Requirement (1) of the” because compliance with all of the *Requirements for Recognition* is required. Add the words “Further, the certifying board must provide evidence of a close” because it identifies the close working relationship between the recognized sponsoring organization and certifying board.

Line 149: Add the words “working relationship with a recognized specialty sponsoring organization that meets all” because it finishes the sentence in line 149.

Line 150: Strike the words “of the”

Requirement 3:

The National Commission has determined that the proposed revisions provide greater clarity to *Requirement 3*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission has determined that it is important to identify both. Further, this requirement is related to the “financial viability” of the certifying boards, which is a better use of terminology than “financial support”.

Line 152: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying” because it is important to identify both. Add an “s” to the word “boards”, strike the word “shall” and add the word “must” because “must” clearly points out that this not optional.

Line 153: Strike the words “submit to the National Commission on Recognition of Dental Specialties and” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 154: Strike the words “Certifying Boards”, add the word “provide”, strike the word “support” and add the word “viability”. The Requirement addresses the financial viability of the certifying board; therefore, the proper term to use is “viability” instead of the word “support”.

Requirement 3 Continued on Page 6, Appendix 1

Line 155: Add the word “certification” and strike the words “of certification” to make the statement grammatically correct.

Requirement 4:

The National Commission has found that not all of the recognized certifying boards understand the intent of Requirement 4; therefore, the National Commission proposes that additional language be added in an effort to provide clarity to the requirement. Further, because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission determined it is important to identify both.

Line 157: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards” because the *Requirements for Recognition* are for both, add an “s” to the word “board” and add the word “outsource”.

Line 158: Add the words “administrative duties to suitable external consultants and/or external agencies” to add clarity to the statement and strike the word “select”.

Line 159: Strike the words “suitable consultants or agencies” because this was clarified in Line 158, add the word “daily” in an effort to provide clarity and strike the words “such as the”.

Line 160: Strike the words “preparation and administration of examinations and the evaluation of records and” because the statement is not necessary and it is addressed in lines 161-164.

Line 161: Strike the words “examinations of candidates” and add the words “and/or examination functions. Add the words “If the certifying board does” to provide clarity.

Lines 162-164: Add the words “outsource administrative and/or examination functions; the certifying board must submit documentation describing the process of selecting consultants or agencies and the duties of these individual(s)/agencies” to provide clarification to the Requirement and add the word “External”.

Line 164: Strike the large case “C” in the word “Consultants” and make it a lower case “c”.

Line 165: Add the words “the development and/or administration of” strike the word “clinical” and add the word “certification” because there is a recognized specialty that does not perform clinical dentistry.

Line 166: Strike the word “should”, add the word “must” because this not optional and add the words “in the specialty that is being examined” to provide clarity to the statement.

Operation of Boards**Requirement 1:**

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 1*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying boards, the National Commission determined that it is important to identify both.

Line 170: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, strike the word “shall” and the words “must only” to provide clarity and strengthen the requirement.

Line 171: Strike the word “only”, strike the word “special” and the word “specialty” and strike the words “of dental”.

Line 172: Strike the words “practice approved”, add the word “recognized” and strike the words “on Recognition of Dental”

Line 173: Strike the words “Specialties and Certifying Boards for such certification” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced. Further, add “(1) after the word “one” and add the word “certifying”.

Line 174: Strike the word “shall” and replace with the word “will”, add the words “by the National Commission” to provide clarity to the statement.

Line 175: Strike the words “single area of practice” and add the words “recognized specialty area of practice” for clarity that this is a recognized specialty area of practice.

Requirement 2:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 2*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission determined that it is important to identify both. Further, the National Commission operates differently than the Council with regard to specialty and certifying board recognition; therefore, the proposed revision makes this operational difference clear.

Line 177: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board” and strike the words “except by”.

Line 178: Strike the words “waiver of the National Commission on Recognition of Dental Specialties and” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 179: Strike the words “Certifying Boards” and “shall” and add the word “must” and add (1)” after the word “one” because the word “shall” is not appropriate and properly announcing the examination details is not optional.

Line 180: Strike the word “shall” and add the word “must” because “shall” is not the proper word to use, strike the word “such”, add the word “details” and add “(6)” after the word “six”.

Lines 181-182: Add the words “of the examination. Recognized certifying boards may request a conditional one (1) time waiver of exception from the National Commission” to provide clarity because there are some certifying boards that appear to not understand *Requirement 2*.

Requirement 3:

The National Commission determined the proposed revisions provide greater clarity to *Requirement 3*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying boards, the National Commission determined that it is important to identify both.

Line 184: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, and strike the word “shall” and add the word “must. The word “shall” does not fit in this statement and the word “must” identifies that this not optional.

Requirement 4:

The National Commission is aware that in 2018 *Requirement 4* had major revisions. The National Commission believes this requirement is extremely important; however, through experience of interpreting it, the National Commission has found this requirement to be vague and unclear. The certifying boards have had difficulty understanding and therefore implementing this particular requirement. The National Commission understands the *Requirements for Recognition* are not meant to be prescriptive; however, this requirement as it is currently written needs clarification.

Line 187: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, and strike the word “shall” and add the word “must. The word “shall” does not fit in this statement and the word “must” identifies that this not optional. Further, because the *Requirements for Recognition* are for both proposed and the recognized certifying boards, the National Commission determined that it is important to identify both.

Line 188: Strike the word “annually” and strike the words “on Recognition of Dental Specialties and” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 189: Strike the words “Certifying Boards”, add the word “viability and” strike the word “applicant”.

Line 190: Strike the word “admission” and add the words “written examination procedures, candidate examination guidelines and” to add clarity to the requirement.

Line 191: Strike the word “and” and add the words “certification and recertification” and add the word “test construction” to provide clarity to the requirement.

Line 192: Add the words “and evaluation,” and add the words “the reporting of” to provide clarification to the requirement.

Line 193: Add the word “and” because the proper name of the standards are Standards for Educational and Psychological Testing.

Line 194: Add the words “in good standing” and add the word “written” to provide clarity that only diplomates in good standing are eligible to receive this information in writing.

Line 195: Add the word “examination” in front of the word “technical” because the proper name of the report is the Examination Technical Report, and add the word “certifying”.

Lines 196-197: Add the words “The recognized certifying boards will submit the required documentation on a cycle established by the National Commission” because specialty and certifying board recognition is the business of the National Commission and the National Commission is within its rights to develop its timelines.

Requirement 5 Page 7, Appendix 1

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 5*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying boards, the National Commission determined that it is important to identify both.

Line 198: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, and strike the word “shall” and replace it with the word “must.

Line 199: **The National Commission supports the Councils proposed revision to strike the word “encourage” and replace it with the word “require”;** however, there is some confusion within the National Commission about the timing of this change, given that the National Commission initially requested this exact revision in 2020.

Requirement 6:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 6*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission has determined that it is important to identify both. Further, timelines associated with the recognition process are under the purview of the National Commission and this requirement, as written, could potentially be in conflict with the National Commission’s timelines established within its own policies and procedures.

Line 202: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, and strike the word “shall” and replace it with the word “must. Because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission has determined that it is important to identify both.

Line 203: Strike the word “periodically” and strike the words “on Recognition of Dental Specialties” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 204: Strike the words “and Certifying Boards”.

Line 205: Strike the words “its continuing” and add the words “of and”.

Line 206: Add the words “continued recognition” for clarity and strike the words “on Recognition of Dental Specialties” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Lines 207-208: Strike the words “and Certifying Boards” and add the words “The recognized certifying boards will submit the required documentation on a cycle established by the National Commission” because timelines associated with the recognition process are under the purview of the National Commission.

Requirement 7:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 7*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission determined that it is important to identify both.

Line 210: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, and strike the word “shall” and add the word “must. The *Requirements for Recognition* are for both proposed certifying boards and the recognized certifying board and the addition of the word “must” shows that this is not optional.

Line 211: Strike the word “full”, add the words “sole authority and”, strike the word “the”, add “ing” to the word “conducting”, strike the word “of” and add the word “certification”.

Requirement 8:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 8*. Because the *Requirements for Recognition* are for both proposed and the recognized certifying board, the National Commission determined that it is important to identify both.

Line 215: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, and strike the word “shall” and replace it with the word “must. The *Requirements for Recognition* are for both proposed certifying boards and the recognized certifying board and the addition of the word “must” shows that this is not optional.

Line 216: Strike the word “in” and add the word “with”

Line 217: Strike the words “supported financially” and add the words “the continued financial viability of” because the words “financial viability” properly describe what the certifying boards need to show, and strike the words “continued programs of the”.

Line 218: Add the word “certifying”.

Certification Requirements

Requirement 1:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 1*. The National Commission has determined that *Requirement 1* is extremely long and as it is currently written tends to be vague. The *Requirements for Recognition* are for both proposed certifying boards and the recognized certifying board and it is important to identify both.

Line 222: Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying boards”, add an “s” at the end of the word “board”, and strike the word “shall” and add the word “must. The *Requirements for Recognition* are for both proposed certifying boards and the recognized certifying board and the addition of the word “must” shows that this is not optional.

Line 223: Strike the word “for” and add the word “in”.

Line 224: Add the words “that is two (2) or more years in length”

Line 225: Add a period after the word Accreditation and strike the words “of two or more academic years in length, as” because it was addressed in line 224.

Line 226: Strike the words “specified by the Commission” because it is not necessary.

Line 228: Add the words “full-time, continual attendance in a Commission on Dental Accreditation” to add clarity to the statement.

Line 229: Add the words “accredited advanced education program” to add clarity to the statement and strike the word “study” because the word “education” on line 230 is more appropriate.

Line 230: Add the word “education”

Line 231: Add the words “(2) or more” to provide clarity of the required program length.

Line 233: Add (4) after the word “four”.

Line 234: Strike the words “continuation and” because this is addressed in line 235.

Line 235: Strike the word “refresher” and add the words “continuation, refresher, (educational experience only obtained through) to provide clarity that this is not acceptable.

Line 236: Add the words “continuing education”, add the word “a”, strike the “s” in departments and strike the word “dental”.

Line 237: Strike the word “school” and add the words “dental education facility” because advanced education programs are not exclusive to only dental schools.

Line 240: Strike the word “Each” and add the words “A certifying”, add the words “alternative pathway” for to clarify that this portion of the requirement is addressing alternative pathways.

Requirement 1 Continued on Page 8, Appendix 1

Line 241: Strike the word “specialty” because in 2018 the Commission on Dental Accreditation removed the word “specialty” from the title of the advanced education programs.

Line 242: Add the words “that is two (2) or more years in length” because that is what Requirement 6 in the *Requirements for Recognition of Dental Specialties* requires.

Line 243: Strike the words “has not met this requirement per se” because it is irrelevant.

Line 244: Strike the word “but” and add the words “comparable educational and/or training requirements” to provide clarity that the expectation of the requirement is that the certifying boards use comparable measures to determine equivalency.

Line 245: Strike the words “equivalent advanced specialty education” because this is addressed in Line 244 and in 2018 the Commission on Dental Accreditation removed the word “specialty” from the title of the advanced education programs.

Line 246: Add the words “submit a separate” and strike the word “on” because this addresses National Commission procedures.

Line 247: Strike the words “Recognition of Dental Specialties and Certifying Boards” because the National Commission has been properly identified as the National Commission on line 16; therefore, it is not necessary to have the entire name of the National Commission referenced.

Line 248: Add the words “and/or revise”, strike the words “such a policy” and add the words “policy on alternative pathways” to clarify the requirement.

Requirement 2:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 2* and provides proper language that identifies the recognized specialties and any proposed specialties as disciplines, not areas of dentistry. Because the *Requirements for Recognition* are both proposed and the recognized certifying boards, the National Commission determined that it is important to identify both.

Line 250- Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying, add an “s” to the word board and strike the word “shall” and add the word “must”. The *Requirements for Recognition* are for both proposed certifying boards and the recognized certifying board and the addition of the word “must” shows that this is not optional.

Line 252- Strike the words “this area” and add the words “the discipline specific” because the specialties should be properly identified as disciplines.

Line 253- Add the word “specialty”

Requirement 3:

The National Commission determined that the proposed revisions provide greater clarity to *Requirement 3*. Because the *Requirements for Recognition* are both proposed and the recognized certifying boards, the National Commission determined that it is important to identify both.

Line 255-Strike the word “Each” and add the words “Applicant certifying boards and the recognized certifying and add an “s” to the word board.

Line 256- Add the words “recognized specialty”, strike the word “shall” and replace with the word “must” to show that this is not optional.

Line 257- Strike the word “its” and add the word “joint” and add the words “Commission on Dental Accreditation educational” to clarify intent and compliance with the requirement.

Line 258- Add the words “standards for the advanced”, add the words “for that specialty” and strike the words “and experience” to provide clarity to the statement.

Line 259: Strike the words “requirements which candidates will be expected to meet” because it is not necessary.

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank J. Tuminelli, DMD, FACP". The signature is fluid and cursive, with the first name "Frank" being the most prominent.

Frank J. Tuminelli, DMD, FACP

Chair

National Commission on Recognition of Dental Specialties and Certifying Boards

cc: Dr. Anthony Ziebert, senior vice president, Educational and Professional Affairs

Ms. Catherine Baumann, director, National Commission on Recognition of Dental Specialties
and Certifying Boards



(Proposed Deletions are ~~stricken~~; additions are underlined)

Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists

(*Trans.2001:470; 2004:313; 2009:443; 2013:328; 2018:326*)

Adopted as Amended by the ADA House of Delegates, October 2018

Introduction

The Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists contain criteria that specialty applicants and the recognized specialty sponsoring organizations and certifying boards must meet in order to become and/or remain recognized by the National Commission on Recognition of Dental Specialties and Certifying Boards (National Commission).

A specialty is ~~an area~~ a discipline of dentistry that has a separate, distinct and well-defined focus based on unique advanced knowledge, skills and training that ~~has~~ have been formally recognized by the National Commission ~~on Recognition of Dental Specialties and Certifying Boards~~ as meeting the "Requirements for Recognition of Dental Specialists" specified in this document. Dental specialties are recognized to protect the public, nurture the art and science of dentistry, and improve the quality of care in disciplines of dentistry in which advanced knowledge, skills and training are essential to maintain or restore oral health. ~~It is the Association's belief that the needs of the public are best served if the profession is oriented primarily to general practice. Specialties are recognized in those areas where advanced knowledge and skills are essential to maintain or restore oral health.~~¹

~~Not all areas in dentistry will satisfy the requirements for specialty recognition. However, the public and profession benefit substantially when non-specialty groups develop and advance areas of interest through education, practice and research. The contributions of such groups are acknowledged by the profession and their endeavors are encouraged.~~

Not all disciplines in dentistry will satisfy the requirements for specialty recognition and there should be no expectation that all disciplines in dentistry will meet the Requirements for Recognition of Dental Specialties. Disciplines of dentistry that are not currently recognized as a specialty by the National Commission and believe they can meet all of the Requirements for Recognition of Dental Specialties, The sponsoring organization must should contact the National Commission for a formal Application for Specialty Recognition. submit to the National Commission on Recognition of Dental Specialties and Certifying Boards a formal application which demonstrates compliance with all the requirements for specialty recognition. When

42 making decisions related to specialty recognition, the National Commission will only determine
43 compliance with the criteria outlined in the *Requirements for Recognition*.

44
45 If a discipline of dentistry is granted specialty recognition by the National Commission
46 Following recognition of a specialty by the National Commission on Recognition of Dental
47 Specialties and Certifying Boards a national board for certifying diplomates in accordance with
48 the "*Requirements for National Certifying Boards for Dental Specialists*" ~~may~~ must be
49 established ~~as specified in this document~~ and recognized by the National Commission as the
50 national certifying board for the specialty.

51
52 [‡] ~~Association policies regarding ethical announcement of specialization and limitation of~~
53 ~~practice are contained in the *ADA Principles of Ethics and Code of Professional Conduct*.~~

Requirements for Recognition of Dental Specialties

A sponsoring organization seeking specialty recognition ~~for in an area a discipline of dentistry that is not currently recognized as a dental specialty~~ must be able to provide documented evidence that the discipline satisfies all the ~~requirements~~ Requirements for Recognition of Dental Specialties specified in this section. Specialty sponsoring organizations recognized by the National Commission must be able to show continued compliance with the Requirements for Recognition specified in this section.

- (1) In order for ~~an area a discipline of dentistry~~ t to become and/or remain recognized as a dental specialty, it must be represented by a sponsoring organization: (a) whose membership is reflective of ~~that the~~ proposed or recognized dental specialty; (b) in which the privileges to hold office and to vote on any issue related to the specialty are reserved for dentists who have either ~~have~~ completed an advanced education program that is a minimum of two (2) years in length accredited by the Commission on Dental Accreditation in ~~that the~~ proposed or recognized specialty or have sufficient educational and/or practice experience in ~~that the~~ specialty as deemed appropriate through written criteria established by the sponsoring organization and its certifying board; and (c) that demonstrates the ability to establish a certifying board, if the sponsoring organization is not recognized by the National Commission. The recognized specialty sponsoring organization must continue to have a recognized certifying board that continually meets the Requirements for Recognition of National Certifying Boards for Dental Specialists in order to remain recognized
- (2) A proposed specialty and a recognized specialty must be a distinct and well-defined field ~~which that~~ requires unique advanced knowledge, skills and training and skills beyond those commonly possessed by dental school graduates as defined by the Commission on Dental Accreditation's Accreditation Standards for Dental Education Programs.
- (3) The scope of practice of ~~the a~~ proposed specialty and a recognized specialty requires advanced knowledge, skills and ~~skills training~~ that: (a) in their entirety are separate and distinct, with minimal overlap from in the knowledge, skills and skills training required to practice in any recognized dental specialty; and (b) cannot be accommodated through minimal modification of ~~a~~ any of the recognized dental specialty specialties.
- (4) ~~The A proposed~~ specialty ~~applicant~~ and a recognized specialty must document scientifically, by valid and reliable statistical evidence/studies, that it: (a) actively contributes to new knowledge in the field; (b) actively contributes to professional education the educational needs of the discipline at the predoctoral, postdoctoral and continuing education levels; (c) actively ~~contributes to~~ engages in research ~~needs of the profession that establishes evidence-based validity of therapy used by practitioners in the proposed/recognized specialty~~; and (d) ~~provides oral health services in the field of study for the public~~ demonstrates a need for service that is not currently being met by general

98 ~~practitioners or any of the recognized dental specialties. ; each of which the specialty~~
99 ~~applicant must demonstrate would not be satisfactorily met except for the contributions of~~
100 ~~the specialty applicant.~~

101
102 (5) A proposed specialty and a recognized specialty must ~~directly~~ have a direct benefit/impact
103 ~~some aspect of~~ on clinical patient care and meet the needs of its patient population.

104
105 (6) A proposed specialty and a recognized specialty must have Formal formal advanced
106 education programs accredited by the Commission on Dental Accreditation that are a
107 minimum of two (2) years in length. ~~of at least two years accredited by the Commission on~~
108 ~~Dental Accreditation must exist to provide the special knowledge and skills required for~~
109 ~~practice of the proposed specialty.~~

110
111

Requirements for Recognition of National Certifying Boards for Dental Specialists

In order to become, and remain, eligible for recognition by the National Commission ~~on Recognition of Dental Specialties and Certifying Boards~~ as a national certifying board for a dental specialty, the specialty ~~shall~~ must have a recognized sponsoring organization that meets all of the ~~elements of Requirement (1) of the~~ Requirements for Recognition of Dental Specialties. A close working relationship ~~shall~~ must be maintained between the recognized sponsoring organization and the certifying board. A certifying board seeking recognition must be able to provide documented evidence showing that it satisfies all the Requirements for Recognition of National Certifying Boards for Dental Specialists specified in this section. Certifying boards recognized by the National Commission must be able to show continued compliance with all of the Requirements for Recognition specified in this section. Additionally, the following requirements must be fulfilled.

Organization of Boards:

- (1) ~~Each Applicant certifying boards and the recognized certifying Board boards shall must~~ have no less than five ~~(5) or and no~~ more than ~~twelve (12)~~ voting directors/officers designated on a rotation basis in accordance with a method approved by the National Commission ~~on Recognition of Dental Specialties and Certifying Boards~~. Although the National Commission does not ~~prescribe~~ recommend a single method for selecting directors/officers of boards, ~~members~~ directors/officers may not serve for more than a cumulative total of nine ~~(9)~~ years. ~~Membership on the board shall be in accordance with a prescribed method endorsed by the sponsoring organization.~~ All ~~board~~ voting directors/officers ~~shall~~ must be diplomates of that specific certifying board and ~~only~~ the ~~sponsoring organizations of certifying~~ boards may establish additional criteria/qualifications if they so desire.
- (2) ~~Each Applicant certifying boards and the recognized certifying boards shall submit in writing to the National Commission must have on Recognition of Dental Specialties and Certifying Boards~~ a certification program that is sufficiently comprehensive in scope and meets the needs of the diplomate practitioners in the recognized specialty, the profession and protects the public. ~~requirements established by the American Dental Association for the operation of a certifying board. This statement should include evidence of sponsorship of the board by a national organization that meets all the elements of Requirement (1) of the~~ Further, the certifying board must provide evidence of a close working relationship with a recognized specialty sponsoring organization that meets all of the Requirements for Recognition of Dental Specialties.
- (3) ~~Each Applicant certifying boards and the recognized certifying boards shall must submit to the National Commission on Recognition of Dental Specialties and Certifying Boards~~ provide evidence of adequate financial ~~support~~ viability to conduct

155 its certification program ~~of certification.~~

- 156
- 157 (4) ~~Each Applicant certifying boards and the recognized certifying boards~~ may outsource
- 158 administrative duties to suitable external consultants and/or external agencies ~~select~~
- 159 ~~suitable consultants or agencies~~ to assist in its daily operations, ~~such as the~~
- 160 ~~preparation and administration of examinations and the evaluation of records and~~
- 161 ~~examinations of candidates~~ and/or examination functions. If the certifying board does
- 162 outsource administrative and/or examination functions; the certifying board must
- 163 submit documentation describing the process of selecting consultants or agencies and
- 164 the duties of these individual(s)/agencies. ~~External-Consultants~~ consultants who
- 165 participate in the development and/or administration of clinical certification
- 166 examinations ~~should~~ must be diplomates in the specialty that is being examined.
- 167

168 Operation of Boards:

- 169
- 170 (1) ~~Each Applicant certifying boards and the recognized certifying boards~~ shall ~~must~~ only
- 171 certify qualified dentists as diplomates ~~only~~ in the special specialty area ~~of dental~~
- 172 ~~practice approved~~ recognized by the National Commission ~~on Recognition of Dental~~
- 173 ~~Specialties and Certifying Boards for such certification.~~ No more than one (1) certifying
- 174 board ~~shall will~~ be recognized by the National Commission for the certification of
- 175 diplomates in a ~~single area of practice~~ recognized specialty area of practice.
- 176
- 177 (2) ~~Each Applicant certifying boards and the recognized certifying boards, except by~~
- 178 ~~waiver of the National Commission on Recognition of Dental Specialties and~~
- 179 ~~Certifying Boards, shall must~~ give at least one (1) examination in each calendar year
- 180 and ~~shall must~~ announce ~~such~~ examination details at least six (6) months in advance
- 181 of the examination. Recognized certifying boards may request a conditional one (1)
- 182 time waiver of exception from the National Commission.
- 183
- 184 (3) ~~Each Applicant certifying boards and the recognized certifying boards~~ shall ~~must~~
- 185 maintain a current list of its diplomates.
- 186
- 187 (4) ~~Each Applicant certifying boards and the recognized certifying boards~~ shall ~~must~~
- 188 submit annually to the National Commission ~~on Recognition of Dental Specialties and~~
- 189 ~~Certifying Boards~~ data relative to its financial viability and operations, ~~applicant~~
- 190 ~~admission~~ written examination procedures, candidate examination guidelines and
- 191 procedures, and certification and recertification examination content, test construction
- 192 and evaluation, and the reporting of results. Examination procedures and results should
- 193 follow the Standards for Educational and Psychological Testing, including validity and
- 194 reliability evidence. A diplomate in good standing may, upon written request, obtain a
- 195 copy of the annual examination technical and financial reports of the certifying board.
- 196 The recognized certifying boards will submit the required documentation on a cycle
- 197 established by the National Commission.

- 198 (5) ~~Each Applicant certifying boards and the recognized certifying boards shall must~~
 199 ~~encourage~~ require its diplomates to engage in lifelong learning and continuous quality
 200 improvement.
- 201
- 202 (6) ~~Each Applicant certifying boards and the recognized certifying boards shall must~~
 203 provide ~~periodically~~ to the National Commission ~~on Recognition of Dental Specialties~~
 204 ~~and Certifying Boards~~ evidence of its examination and certification of a significant
 205 number of additional dentists in order to warrant ~~its continuing~~ approval of and
 206 continued recognition by the National Commission ~~on Recognition of Dental Specialties~~
 207 ~~and Certifying Boards~~ The recognized certifying boards will submit the required
 208 documentation on a cycle established by the National Commission.
- 209
- 210 (7) ~~Each Applicant certifying boards and the recognized certifying boards shall must~~ bear
 211 ~~full sole authority and~~ responsibility for ~~the conducting of~~ its certification program, the
 212 evaluation of the qualifications and competence of those it certifies as diplomates, and
 213 the issuance of certificates.
- 214
- 215 (8) ~~Each Applicant certifying boards and the recognized certifying boards shall must~~ require
 216 an annual registration fee from each of its diplomates intended to assist ~~in~~ with
 217 supporting financially the continued financial viability of the ~~continued program of the~~
 218 certifying board.

Certification Requirements:

- 222 (1) ~~Each Applicant certifying boards and the recognized certifying boards shall must~~
 223 require, for eligibility ~~for~~ in certification as a diplomate, the successful completion of an
 224 advanced education program that is two (2) or more years in length accredited by the
 225 Commission on Dental Accreditation. ~~of two or more academic years in length, as~~
 226 ~~specified by the Commission.~~
- 227
- 228 Although full-time, continual attendance in a Commission on Dental Accreditation
 229 accredited advanced education program is desirable, the period of advanced ~~study~~
 230 education need not be continuous, nor completed within successive calendar years. An
 231 advanced educational program equivalent to two (2) or more academic years in length,
 232 successfully completed on a part-time basis over an extended period of time as a
 233 graduated sequence of educational experience not exceeding four (4) calendar years,
 234 may be considered acceptable in satisfying this requirement. Short ~~continuation and~~
 235 ~~refresher~~ continuation, refresher courses (educational experience only obtained through
 236 continuing education) and teaching experience in a specialty departments in dental
 237 schools a dental education facility will not be accepted in meeting any portion of this
 238 requirement.
- 239
- 240 ~~Each~~ A certifying board may establish an exception (alternative pathway) to the

241 qualification requirement of completion of an advanced ~~specialty~~ education program
242 that is two (2) or more years in length accredited by the Commission on Dental
243 Accreditation for the unique candidate who ~~has not met this requirement per se,~~
244 ~~but~~ can demonstrate comparable educational and/or training requirements to the
245 satisfaction of the certifying board, ~~equivalent advanced specialty education~~. A
246 certifying board must submit a separate petition the National Commission ~~on~~
247 ~~Recognition of Dental Specialties and Certifying Boards~~ for permission to establish
248 and/or revise such a policy ~~policy on alternative pathways~~.

249
250 (2) ~~Each Applicant certifying boards and the recognized certifying~~ boards ~~shall~~ must
251 establish its minimum requirements for years of practice in the area for which it grants
252 certificates. The years of advanced education in ~~this area~~ the discipline specific
253 specialty may be accepted toward fulfillment of this requirement.

254
255 (3) ~~Each Applicant certifying boards and the recognized certifying~~ boards, in cooperation
256 with its recognized specialty sponsoring organization, ~~shall~~ must prepare and publicize
257 ~~its~~ joint recommendations on the Commission on Dental Accreditation educational
258 standards for the advanced education programs for that specialty ~~and experience~~
259 ~~requirements which candidates will be expected to meet~~.

March 31, 2022

Dr. Donna Thomas-Moses, Chair
Council on Dental Education and Licensure
American Dental Association
211 E. Chicago Ave
Chicago, IL 60611

VIA EMAIL: Ms. Annette Puzan, puzana@ada.org

Dear Dr. Thomas-Moses:

Thank you for providing an opportunity to comment on the *Requirements for Recognition* used by the National Commission on Recognition of Dental Specialties and Certifying Boards.

The American Academy of Periodontology (AAP) acknowledges that significant training and a commitment to lifelong learning are fundamental to providing safe and effective specialized dental care. As a result, upholding stringent standards for what constitutes a recognized dental specialty is crucial.


While the *Requirements for Recognition* provide clear guidance for specialties and specialty boards, the AAP supports the modification to Operations of Boards paragraph 5 brought forth by its certifying body, the American Board of Periodontology:

“Each Board shall **encourage require** its diplomates to engage in lifelong learning and **shall encourage** continuous quality improvement.”

The American Academy of Periodontology encourages the rigorous process of obtaining Board Certification and sees the value in this simple, yet impactful, recommended change.

Thank you, again, for the opportunity to provide feedback on the *Requirements for Recognition*. Please let us know if you require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris R. Richardson". The signature is written in a cursive, flowing style.

Christopher R. Richardson, DMD, MS
President
American Academy of Periodontology

cc:

Ms. Catherine Baumann, Director, NCRDSCB
Erin O'Donnell Dotzler, Executive Director, AAP

Proposed Revisions to Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists

Introduction

The Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists contain criteria that specialty applicants and the recognized specialty sponsoring organizations and certifying boards must meet in order to become and/or remain recognized by the National Commission on Recognition of Dental Specialties and Certifying Boards (National Commission).

A specialty is a discipline of dentistry that has a separate, distinct and well-defined focus based on unique advanced knowledge, skills and training that has been formally recognized by the National Commission as meeting the "*Requirements for Recognition of Dental Specialists*" specified in this document. Dental specialties are recognized to protect the public, nurture the art and science of dentistry, and improve the quality of care in disciplines of dentistry in which advanced knowledge, skills and training are essential to maintain or restore oral health.

Not all disciplines in dentistry will satisfy the requirements for specialty recognition and there should be no expectation that all disciplines in dentistry will meet the Requirements for Recognition of Dental Specialties. Disciplines of dentistry that are not currently recognized as a specialty by the National Commission and believe they can meet **all** of the Requirements for Recognition of Dental Specialties, should contact the National Commission for a formal Application for Specialty Recognition. When making decisions related to specialty recognition, the National Commission will only determine compliance with the criteria outlined in the Requirements for Recognition.

If a discipline of dentistry is granted specialty recognition by the National Commission a national board for certifying diplomates in accordance with the "*Requirements for National Certifying Boards for Dental Specialists*" must be established and recognized by the National Commission as the national certifying board for the specialty.

Requirements for Recognition of Dental Specialties

A sponsoring organization seeking specialty recognition in a discipline of dentistry that is not currently recognized as a dental specialty must be able to provide documented evidence that the discipline satisfies all the Requirements for Recognition of Dental Specialties specified in this section. Specialty sponsoring organizations recognized by the National Commission must be able to show continued compliance with the Requirements for Recognition of Dental Specialties specified in this section.

- (1) In order for a discipline of dentistry to become and/or remain recognized as a dental specialty, it must be represented by a sponsoring organization: (a) whose membership is reflective of the proposed or recognized dental specialty; (b) in which the privileges to hold office and to vote on any issue related to the specialty are reserved for dentists who have either completed an advanced education program that is a minimum of two (2) academic years in length accredited by the Commission on Dental Accreditation in the proposed or recognized specialty or have sufficient educational and/or practice experience in the specialty as deemed appropriate through written criteria established by the sponsoring organization and its certifying board; and (c) that demonstrates the ability to establish and maintain a certifying board, if the sponsoring organization is not recognized by the National Commission. The recognized specialty sponsoring organization must continue to have a recognized certifying board that continually meets the Requirements for Recognition of National Certifying Boards for Dental Specialists in order to remain recognized.
- (2) A proposed or recognized specialty must be a distinct and well-defined field that requires unique advanced knowledge, skills and training beyond those commonly possessed by dental school graduates as defined by the Commission on Dental Accreditation's Accreditation Standards for Dental Education Programs.
- (3) The scope of practice of a proposed or recognized specialty requires advanced knowledge, skills and training that: (a) in their entirety are separate and distinct from the knowledge, skills and training required to practice in any recognized dental specialty; and (b) cannot be accommodated through minimal modification of any of the recognized dental specialties.
- (4) A proposed or recognized specialty must document scientifically, by valid and reliable statistical evidence/studies, that it: (a) actively contributes to new knowledge in the field; (b) actively contributes to the educational needs of the discipline at the predoctoral, postdoctoral and continuing education levels; (c) actively engages in research that establishes evidence-based validity of therapy used by practitioners in the proposed or recognized specialty; and (d) demonstrates a need for service that is not currently being met by general practitioners or any of the recognized dental specialties.
- (5) A proposed or recognized specialty must have a direct benefit/impact on clinical patient care and meet the needs of its patient population.
- (6) A proposed or recognized specialty must have formal advanced education programs accredited by the Commission on Dental Accreditation that are a minimum of two (2) academic years in length.

Requirements for Recognition of National Certifying Boards for Dental Specialists

In order to become, and remain, eligible for recognition by the National Commission as a national certifying board for a dental specialty, the specialty must have a recognized sponsoring organization that meets all of the Requirements for Recognition of Dental Specialties. A close working relationship must be maintained between the recognized sponsoring organization and the certifying board. A certifying board seeking recognition must be able to provide documented evidence showing that it satisfies all the Requirements for Recognition of National Certifying Boards for Dental Specialists specified in this section.

Certifying boards recognized by the National Commission must be able to show continued compliance with all of the Requirements for Recognition of National Certifying Boards for Dental Specialists as specified in this section.

Organization of Boards:

- (1) An applicant and a recognized certifying board must have no less than five (5) and no more than twelve (12) voting directors/officers designated on a rotation basis in accordance with a method approved by the National Commission. Although the National Commission does not recommend a single method for selecting directors/officers of boards, directors/officers may not serve for more than a total of nine (9) years. All voting directors/officers must be diplomates of that specific certifying board and the certifying board may establish additional criteria/qualifications if they so desire.
- (2) An applicant and a recognized certifying board must have a certification program that is comprehensive in scope and meets the needs of the diplomate practitioners in the recognized specialty and the profession and protects the public. Further, the certifying board must provide evidence of a close working relationship with a recognized specialty sponsoring organization that meets all of the Requirements for Recognition of Dental Specialties.
- (3) An applicant and a recognized certifying board must provide evidence of adequate financial viability to conduct its certification program.
- (4) An applicant and a recognized certifying board may outsource administrative duties to suitable external consultants and/or external agencies to assist in daily operations, and/or examination functions. If the certifying board does outsource administrative and/or examination functions, the certifying board must submit documentation describing the process. External and internal consultants who participate in the development and/or administration of certification examinations must be diplomates in the specialty that is being examined.

Operation of Boards:

- (1) An applicant and a recognized certifying board must only certify qualified dentists as diplomates in the specialty area recognized by the National Commission. No more than one (1) certifying board will be recognized by the National Commission for the certification of diplomates in a recognized specialty area of practice.
- (2) An applicant and a recognized certifying board, must give at least one (1) examination in each calendar year and must announce examination details at least six (6) months in advance of the examination. In extraordinary circumstances, recognized certifying boards may request a conditional waiver of exception from the National Commission.

- (3) An applicant and a recognized certifying board must maintain a current list of diplomates.
- (4) An applicant and a recognized certifying board must submit to the National Commission data relative to financial viability and operations, written examination procedures, candidate examination guidelines and procedures, certification and recertification examination content, test construction and evaluation, and the reporting of results. Examination procedures and results should follow the Standards for Educational and Psychological Testing, including validity and reliability evidence. A diplomate in good standing may, upon written request, obtain a copy of the annual examination technical and financial reports of the certifying board. The recognized certifying boards will submit the required documentation on a cycle established by the National Commission.
- (5) An applicant and a recognized certifying board must require diplomates to engage in lifelong learning and shall encourage continuous quality improvement.
- (6) An applicant and a recognized certifying board must provide to the National Commission evidence of examination and certification of a significant number of additional dentists in order to warrant approval of and continued recognition by the National Commission. The recognized certifying boards will submit the required documentation on a cycle established by the National Commission.
- (7) An applicant and a recognized certifying board must bear sole authority and responsibility for conducting the certification programs, the evaluation of the qualifications and competence of those certified as diplomates, and the issuance of certificates.

Certification Requirements:

- (1) An applicant and a recognized certifying board must require, for eligibility for certification as a diplomate, the successful completion of an advanced education program that is two (2) or more academic years in length accredited by the Commission on Dental Accreditation.

Although full-time, continual attendance in a Commission on Dental Accreditation accredited advanced education program is desirable, the period of advanced education need not be continuous, nor completed within successive calendar years. An advanced educational program equivalent to two (2) or more academic years in length, successfully completed on a part-time basis over an extended period of time as a graduated sequence of educational experience not exceeding four (4) calendar years, may be considered acceptable in satisfying this requirement. Short continuation, refresher courses (educational experience only obtained through continuing education) and teaching experience in a specialty department in a dental education facility will not be accepted in meeting any portion of this requirement.

A certifying board may establish an exception (alternative pathway) to the qualification requirement of completion of an advanced education program that is two (2) or more academic years in length accredited by the Commission on Dental Accreditation for the unique candidate who can demonstrate comparable educational and/or training requirements to the satisfaction of the certifying board. A certifying board must submit a separate petition to the National Commission for permission to establish and/or revise policy on alternative pathways.

- (2) An applicant and a recognized certifying board must establish minimum requirements for years of practice in the area for which certificates are granted. The years of advanced education in the discipline specific specialty may be accepted toward fulfillment of this requirement.
- (3) An applicant and a recognized certifying board, in cooperation with their recognized specialty sponsoring organization, must prepare and publicize joint recommendations on the Commission on Dental Accreditation educational standards for the advanced education programs for that specialty.