

1 ADA Council on Dental Benefit Programs
2 Code Maintenance Committee (CMC)
3 Composition, Responsibilities and Meeting Protocol

4 Effective: May 15, 2026

5
6 **Notes:** This publication documents the Code Maintenance Committee's role in maintaining the
7 ADA intellectual property known as the *Code on Dental Procedures and Nomenclature*
8 (CDT Code). Content updates will be made as needed to ensure that this purpose is
9 achieved.
10 All materials concerning CDT Code maintenance are maintained and stored by the ADA
11 as the CMC Secretariat.

TABLE OF CONTENTS

1		
2	1.0	Introduction 1
3	2.0	Scope of CMC Responsibilities 1
4	3.0	Committee Composition 1
5	4.0	Member Organization Obligations 2
6	5.0	Meetings 2
7	5.1.	Annual (In-Person) 2
8	5.2.	Conference Calls 3
9	6.0	CMC Chair 3
10	7.0	Secretariat 3
11	8.0	Voting 3
12	8.1.	General 3
13	8.2.	Editorial Actions 4
14	8.3.	Substantive Actions 4
15	8.4.	Introduction of Substantive Amendments to Submitted Action
16		Items 4
17	8.5.	Rationales for CDT Code Action Request Vote Outcome 4
18	9.0	CDT Code Maintenance Process Overview 5
19	9.1.	Flowchart 5
20	9.2.	Timeline 6
21	9.3.	Substantive Action Request 6
22	9.4.	Editorial Action Request 6
23	9.5.	Action Report 7
24	9.6.	Submission for Reconsideration 7
25	10.0	CDT Code Action Request Evaluation Guidelines 7
26	11.0	Ad-Hoc Working Groups 7
27	12.0	Non-Member (Observer) Protocol 7
28	12.1.	Written Public Comment 7
29	12.2.	Intra-Meeting Observer Participation 8
30	13.0	Parliamentary Procedures 8
31		Appendix 1 – CMC Member Organizations as of May 15, 2026 9
32		Appendix 2 – Requests for CMC Membership 10
33		Appendix 3 – CMC Member Organization Ongoing Participation Requirements 11

1.0 INTRODUCTION

PL 104-191, the Health Insurance Portability and Accountability Act of 1996 (HIPAA), was enacted on August 21, 1996. The Secretary, Health and Human Services, under the law's Administrative Simplification provisions, published the final rule on HIPAA standard transactions and code sets in the August 17, 2000, Federal Register. This rule addressed changes to 45CFR Parts 160 and 162, which established standards for electronic health care transactions and code sets used in these transactions. According to the regulatory text:

- 162.1002 Medical Data Code Sets – The Secretary adopts the following code set maintaining organization's code sets as the standard data code sets:
 - (d) *Code on Dental Procedures and Nomenclature*, as maintained and distributed by the American Dental Association, for dental services.

The purpose of the CDT Code is to achieve uniformity, consistency and specificity in accurately recording and reporting dental treatment. One use of the CDT Code is to provide for the efficient processing of dental claims, and another is to populate an Electronic Health Record. The dental profession has been using the CDT Code since 1969 to report dental procedures for a variety of reasons and is therefore familiar with this code set. The CDT Code satisfies the dual aims of profession-wide standardization in reporting, and the administrative simplification that stems from a universally recognized taxonomy.

The Code Maintenance Committee (CMC) is a standing committee of the ADA's Council on Dental Benefit Programs (CDBP) This committee:

- Enables the Council to fulfill its ADA Governance and Organization Manual responsibility
- Has broad representation from the dental community in accordance with ADA policy
- Follows protocols that are in accordance with requirements for the maintenance of named HIPAA medical code sets
- Is chaired by a current or past Council member

2.0 SCOPE OF CMC RESPONSIBILITIES

The CMC is responsible for maintaining the narrative components of a CDT code entry – 1) the required "Nomenclature," the written title of a Procedure Code; and 2) the optional "Descriptor," a written narrative that further defines the nature and intended use of a single Procedure Code To fulfill this responsibility the CMC:

1. Determines what action to take on all substantive and editorial action requests concerning individual CDT code content (e.g., addition of new; revision to existing; deletion of existing).
2. Initiates and makes decisions on its own CDT Code action requests.
3. Suggests the location (e.g., Category of Service) where CDT Code additions would be placed.

3.0 COMMITTEE COMPOSITION

The Code Maintenance Committee is comprised of organizations (i.e., legal entities) in the categories listed within this section. There are no individual (i.e., natural person) members.

- American Dental Association (5 representatives, one of whom will serve as CMC chair)
- Dental specialty organizations (e.g., those recognized by the "National Commission on Recognition of Dental Specialties and Certifying Boards" – 1 representative each)

- Dental professional organizations representing practitioners and dental educators (1 representative each)
- Third-party payer and dental benefits organizations (1 representative each)

Appendix 1 contains the list of current CMC member organizations.

Appendix 2 describes the process to be followed by organizations that seek to become CMC members.

Appendix 3 outlines the requirements for and policy concerning ongoing CMC membership.

4.0 MEMBER ORGANIZATION OBLIGATIONS

A CMC member organization:

- Appoints, at its full discretion, the individual who will represent its interests and exercise the organization's vote during the committee's meetings.
 - Representatives are not subject to ratification by the CMC or other entity before being seated.
 - Member organizations may appoint their representative on a continuing or meeting-by-meeting basis, or ad-hoc during a meeting, to ensure that all member organizations present are able to cast their ballot.
- Names the individual(s), which may include staff, to whom all CMC related materials and information will be conveyed.
- Is responsible for all expenses, individual and otherwise, incurred in their CDT Code maintenance activities.
- Is responsible for educating its representatives on the CMC's processes as described in this document.
- Is expected to review and discuss all CDT Code Action Requests within their constituency prior to the CMC's annual meeting.
- Must ensure that its representative is present to engage in discussion and cast a vote on all business that comes before the committee.

Appendix 3 describes the process to be followed when a member organization does not fulfill its membership obligations.

5.0 MEETINGS

5.1 Annual (In-Person)

The CMC annual business meeting is the scheduled event during which the committee determines which of the substantive and editorial action requests will be included in the CDT Code's next version. Meetings convene during the 1st quarter of each calendar year at ADA Headquarters in Chicago on dates that present minimal conflict with other major dental events. Each annual CMC meeting is scheduled to be in session for two consecutive days, a Thursday and Friday. Early adjournment is possible, and dependent on time needed to complete committee discussion and action on all agenda items.

Note: Under special circumstances virtual participation by member organization representatives or staff may be accommodated. However, a member organization must be represented in-person to cast a vote on any business before the committee.

5.2 Conference Calls

The CMC may convene by conference call when an urgent matter is identified for discussion by all member organizations.

6.0 CMC CHAIR

This individual is named by the Council on Dental Benefit Programs and is also a voting member representing the ADA. The Chair:

- Determines the agenda for all CMC meetings
- Participates in discussion of action requests and other matters addressed by the CMC
- Must cast a vote as an ADA representative on motions to accept a CDT Code Action Request, and on other matters that come to ballot
- Performs other administrative functions as required to complete CMC meeting work in a timely and efficient manner
- May establish ad-hoc working groups when needed to support CMC work
- When absent, she or he may designate another ADA representative to serve as the Temporary Chair, with the same responsibilities

7.0 SECRETARIAT

ADA staff serve as the CMC Secretariat that is responsible for:

- Process Administration – Includes: meeting and conference call arrangements; preparation and distribution of meeting notices, action request submissions, agenda and other discussion material, and action reports; records maintenance; form creation and update (e.g., Action Requests; Summary Reports).
- Action Request “Triage” – Includes: identification of required information errors or omissions so that only submissions that adhere to the submission and evaluation guidelines, as specified in the Preface of the CDT Code Action Request form’s most current version, are conveyed to the CMC for consideration. The most current version of the request form is posted on the ADA’s CDT Code internet site (www.ada.org/cdt) – [Request to Change to the Code | American Dental Association \(ada.org\)](http://www.ada.org/cdt).

Note: Secretariat “triage” is performed on all action requests, substantive and editorial –

1. Received by the November closing date for submissions.
 2. During the CMC meeting before the CMC Chair calls for a vote on:
 - a. Received requests that the CMC has amended.
 - b. New requests initiated by a CMC member organization.
- CDT Code Maintenance Portal Updates (<http://www.ada.org/en/publications/cdt/> or www.ada.org/cdt) Includes: information on CMC meetings; action request inventories; reports of CMC decisions on requested actions.

8.0 VOTING

CMC business items will be addressed in accordance with the meeting agenda as adopted by the committee, and in accordance with the following protocols.

8.1. General

- A simple majority of CMC member organizations present shall constitute a quorum for conducting business

- All motions on CDT Code actions must be worded in the affirmative (e.g., Move to accept substantive inventory item # 99 as submitted.)
- CMC member organizations represented at the meeting must vote Yea, Nay, or Abstain on motions to accept a CDT Code action, or other committee business
- The member organization representative must be present to cast a vote
- No proxy votes are permitted
- A simple majority of the member organizations present and voting will determine the outcome of a motion to accept an action request, or for other committee business as needed
- Abstentions do not count when the majority is determined
- The Chair determines how votes are to be cast during a meeting (e.g., vote cards; raised hands).
- A tie vote means the motion or requested action is not accepted
- A motion to reconsider may be entertained prior to the adjournment of the meeting when a CMC member wishes to discuss an action taken during the meeting

8.2. Editorial Actions (See 9.4 for definition of an editorial action)

- These actions are presented as part of the meeting's consent calendar
- Any CMC member organization may request one or more editorial actions be removed from the consent calendar and be addressed individually

8.3. Substantive Actions (See 9.3 for definition of a substantive action)

- These actions are addressed in the order presented on the Substantive Inventory, or in groups of similar or related requests when determined by the Chair
- A separate motion to accept each substantive request is required
- A single motion to accept a group of similar or related requests is permissible when determined by the Chair

8.4. Introduction of Substantive Amendments to Submitted Action Items

- In instances where a CMC member organization has a substantive amendment that was not included in the published supplemental packet, that amendment may be introduced prior to Observer Comment Period, subject to the following conditions:
 - The amendment must be formally moved and seconded by CMC member representatives.
 - The Chair must determine that introduction of the amendment at that time does not materially impede fair participation or orderly conduct of the meeting.
 - Observers shall be afforded an opportunity to comment on the amendment during the open observer comment period.
 - Once observer comment has closed, further substantive amendments may be introduced in accordance with parliamentary rules.

8.5. Rationales for CDT Code Action Request Vote Outcome

- The CMC will review the Secretariat's draft rationale for declining a request prior to release of a meeting's final action report.
- Unless decided otherwise by the Secretariat, no rationale is needed for accepted requests as the presumption is the submitter's rationale is considered persuasive

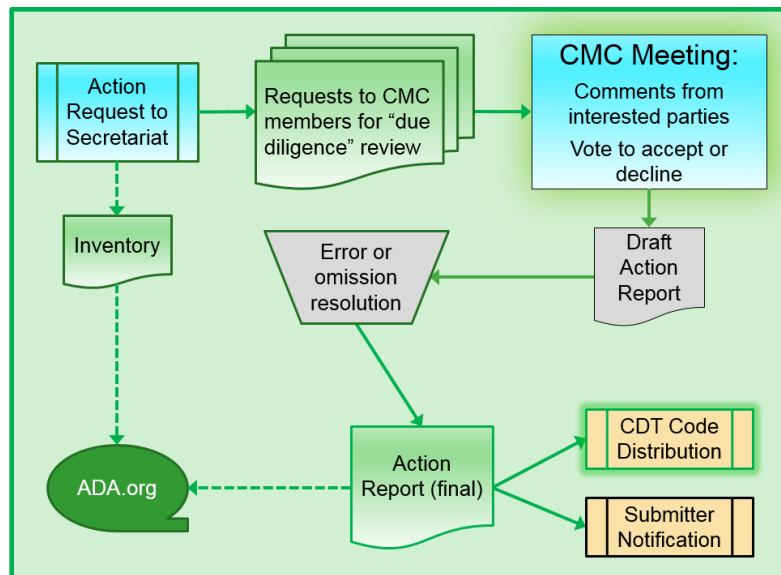
9.0 CDT CODE MAINTENANCE PROCESS – OVERVIEW

The Council has created a CDT Code maintenance process that incorporates the best practices of processes established by other organizations (e.g., AMA for CPT) that maintain HIPAA named medical code sets. The CDT's process was presented to the National Committee on Vital and Health Statistics, the federal agency with HIPAA implementation oversight, in June 2012.

NCVHS, during its hearing, favorably accepted the ADA testimony and responses to questions, and acknowledged that the Council's process has the openness and broad participation sought by HIPAA regulations.

9.1. Flowchart

Key features of the CDT Code maintenance process are in the following illustration.



9.2. Timeline

Process milestones leading to a new CDT Code version are listed in this sample timeline for a future version.

CDT Code Annual Review and Revision Process Tasks and Timeline CDT Code Version Effective January 1, 2030	
Event / Activity Description	Date(s)
Closing date (fixed) for submission of CDT Code Action Requests for this review and revision cycle. <ul style="list-style-type: none"> Requests received after this date will be considered in the next annual review and revision cycle. 	November 1, 2028
Distribution date (fixed) of all Action Request Forms to CMC member organizations to enable their due diligence review prior to the annual committee meeting. <ul style="list-style-type: none"> Request forms also posted on ADA.org/cdt for public information. 	December 1, 2028
Annual CMC meeting at ADA Headquarters in Chicago <ul style="list-style-type: none"> Two-day meeting on dates of first Thursday-Friday of the month. 	March 2029 (mid-month)

Draft CMC Action Report review by CMC member organizations. • Circulated within two weeks of annual meeting's adjournment.	March 2029 (month end)
Final CMC Action Report distributed to CMC member organizations and posted on ADA.org/cdt for public information. • Individual notification of CMC decision (including rationale for declined request) sent to CDT Code Action Request submitters.	April 2029 (mid-month)
No further CMC activity for this CDT Code version (e.g., 2030)	
Version content electronic distribution to CDT Code licensees.	June 2029

1 9.3. Substantive Action Request

2 A substantive CDT Code action is one that results in either a new CDT Code entry, complete deletion of
3 a CDT Code entry, or revision to any part of a CDT Code entry. A substantive Revision affects the
4 nature and scope of a current CDT Code entry.

5 Any individual or organization may submit a substantive action request for consideration, and the
6 request must be on the specified form posted on-line at: [http://www.ada.org/en/publications/cdt/request-](http://www.ada.org/en/publications/cdt/request-to-change-to-the-code)
7 [to-change-to-the-code](http://www.ada.org/en/publications/cdt/request-to-change-to-the-code). Supporting information may be included, accompanied by a written permission
8 to reproduce, and distribute for matter protected by copyright.

9 9.4. Editorial Action Request

10 An editorial CDT Code action is one that addresses grammatical and syntax errors, or other corrections
11 that in the submitter's opinion do not affect the nature and scope of the CDT Code entry. Only CMC
12 member organizations may submit an editorial action.

13 The Editorial change process features a short form action request (illustration following) with CMC
14 adoption by Consent Calendar as noted in the "VOTING" provisions in section 8.2 above.

Editorial			
Inventory #	(CMC Secretariat Use Only)	Date Submitted:	
Submitted By			
CDT Code Entry	D		
Proposed Editorial Revision			
<ul style="list-style-type: none"> Mark-up as follows: Added text – <u>blue underline</u>; deleted text – red strike-through; unchanged text – black 			
Nomenclature			
Descriptor			
Rationale:			

1 9.5. Action Report

2 Action Reports record final decisions on all submissions addressed during the meeting. Report drafts,
3 which include rationales for actions prepared by the Secretariat based on meeting discussion, are
4 circulated via electronic means for CMC member organization review and ratification. When in final
5 form the Substantive Action Report and the Editorial Action Report are distributed to all CMC member
6 organizations. A separate Summary Action Report is posted on ADA.org for public information

7 9.6. Submission for Reconsideration

8 Declined requests may be resubmitted, with new information identified, for consideration during the next
9 (or later as determined by the submitter) review and revision cycle.

10 **10.0 CDT CODE ACTION REQUEST SUBMISSION AND EVALUATION GUIDELINES**

11 These guidelines are in the Preface of CDT Code Action Request form's most current version, which is
12 posted on the ADA's CDT Code internet site (www.ada.org/cdt) – Request to Change to the Code |
13 American Dental Association (ada.org). The Code Maintenance Committee member organization must
14 incorporate these guidelines, in conjunction with information on a request form (e.g., rationale for the
15 addition, revision or deletion), in determining their position when the CMC votes to accept or reject an
16 action request.

17 **11.0 AD-HOC WORKING GROUPS**

18 Working groups may be formed by the Chair to expedite the CMC's work. Scope and deliverables are
19 established when the ad-hoc body is established. A working group dissolves upon preparation of its
20 deliverables.

21 **12.0 NON-MEMBER PUBLIC PARTICIPATION AND OBSERVER PROTOCOL**

22 The CDT Code maintenance process is conducted in an open and transparent manner, providing
23 opportunities for meaningful non-member public participation. The CMC meeting is open to the public
24 for observation and includes structured mechanisms for input from interested non-members, including
25 the submission of written public comments prior to the meeting and limited verbal participation during
26 the meeting when recognized by the Chair. These opportunities are intended to inform committee
27 deliberations while preserving the orderly conduct of meetings and the committee's responsibility for
28 decision-making.

29 The CMC has an obligation to maintain the integrity of the CDT Code maintenance process. Lobbying,
30 undue influence or any contact outside of the defined procedures by third-parties is prohibited.

31 12.1 Written Public Comment

32 A written public comment period shall be made available prior to each CMC meeting. Submission
33 instructions and deadline will be posted online. Written comments related to agenda items submitted
34 during this period will be compiled and distributed to CMC members as part of the supplemental
35 meeting packet. All written comments received by the posted submission deadline will be provided to
36 the CMC for consideration. Comments received after the posted submission deadline will not be
37 transmitted to the CMC.

1 12.2 Intra-Meeting Observer Participation

2 The CMC meeting is open to any person interested in the proceedings to observe the process and
3 listen to discussions. Observers are not CMC members but may have an interest in one or more of the
4 CDT Code Action Requests on the meeting agenda.

5 Such individuals may not disturb the proceedings by interacting with any CMC member organization
6 representative or staff. Any such individual interaction may only occur during a break in the proceedings
7 called by the Chair.

8 When recognized by the Chair, any interested party may comment on a CDT Code action request being
9 discussed by the CMC.

10 Interested parties are asked to make their comments at the time an action item is being addressed by
11 the committee. Such comments are an integral component of the meeting's proceedings; there is no
12 separate period solely for observers to voice their views on any action request. The Chair may also ask
13 observers to address specific committee questions, as needed.

14 **13.0 PARLIAMENTARY PROCEDURES**

15 *The American Institute of Parliamentarians Standard Code of Parliamentary Procedure* is used to
16 expedite due process on matters not addressed by this document.

Appendix 1 – CMC Member Organizations

This is the list of current CMC member organizations (the ADA, 12 dental specialties, 2 dental professional organizations, and 5 third-party payer organizations). When all are represented at a CMC meeting the total number of votes that may be cast on matters that come before the committee is 24.

- American Dental Association – ADA – 5 representatives, one of whom will serve as chair
- Dental specialties – 1 representative each
 1. American Academy of Oral and Maxillofacial Pathology – AAOMP
 2. American Academy of Oral and Maxillofacial Radiology – AAOMR
 3. American Academy of Oral Medicine – AAOM
 4. American Academy of Orofacial Pain – AAOP
 5. American Academy of Pediatric Dentistry – AAPD
 6. American Academy of Periodontology – AAP
 7. American Association of Endodontists – AAE
 8. American Association of Oral and Maxillofacial Surgeons – AAOMS
 9. American Association of Orthodontists – AAO
 10. American Association of Public Health Dentistry – AAPHD
 11. American College of Prosthodontists – ACP
 12. American Society of Dentist Anesthesiologists – ASDA
- Other dental professional organizations – 1 representative each
 1. Academy of General Dentistry – AGD
 2. American Dental Education Association – ADEA
- Third-party payer and dental benefits organizations – 1 representative each
 1. America's Health Insurance Plans – AHIP
 2. Blue Cross and Blue Shield Association – BCBSA
 3. Centers for Medicare and Medicaid Services – CMS
 4. Delta Dental Plans Association – DDPA
 5. National Association of Dental Plans – NADP

Appendix 2 –Requests for CMC Membership

An organization interested in becoming a CMC member must prepare a written request on the entity's letterhead addressed to –

Council on Dental Benefit Programs
American Dental Association
401 N Michigan Avenue
Suite 3300
Chicago, IL 60611

The request must be transmitted in electronic form (i.e., PDF) via email to dentalcode@ada.org. This email address should also be used to convey any questions concerning membership.

Each membership request will be reviewed by the Council and its written decision will be returned electronically.

1 Appendix 3 – CMC Member Organization Ongoing Participation Requirements

2 All CMC member organizations are expected to fulfill their membership obligations and attend
3 committee meetings. The following policy applies when any member organization is not present to vote
4 at a CMC meeting.

5 Any CMC member organization absent from at least one official CMC meeting following two
6 independent attempts by the ADA Secretariat to invite the designated representative shall
7 forfeit their voting representation on the CMC.

8 Failure of a CMC member organization to be present for all agenda items and associated votes
9 until the Chair calls the meeting as officially adjourned may also result in forfeiture of that
10 organization's voting representation on the CMC. Member organizations are strongly
11 encouraged to designate and utilize alternate appointees to ensure full participation in all
12 agenda items.

13 Written notification of the forfeit will be sent on ADA letterhead, signed by the Council on Dental Benefit
14 Programs chair, and transmitted both electronically.

15 A member organization that forfeits its voting representation must request membership in accordance
16 with the "Requests for Membership" process described in Appendix 2.