

Submitting Comments on
Applications for Specialty Recognition
and
Interpretation of the *Requirements for Recognition
of Dental Specialties*

November 2022



National Commission on Recognition of
Dental Specialties and Certifying Boards

Introduction

- As part of the National Commission's Application Process for Recognition of a Dental Specialty, after the Review Committee on Specialty Recognition makes the determination that the application is complete, the National Commission will invite public comment on the applicant's compliance with the *Requirements for Recognition of Dental Specialties* for a sixty (60) day period.
- All comments must be objective and pertain only to the applicant's compliance with the *Requirements for Recognition of Dental Specialties*. The National Commission will disregard comments that are not related to the *Requirements for Recognition of Dental Specialties*.
- Comments that include Protected Health Information (PHI) and/or Personally Identifiable Information (PII), contain unprofessional remarks or anecdotal information related to personal experiences or violate the National Commission's Policy on Integrity will not be considered by the Review Committee on Specialty Recognition or the National Commission Board of Commissioners.



Policy on Integrity

- The National Commission expects that integrity and decorum will be exhibited by all organizations and individuals throughout the recognition process.
- During the public comment period of the recognition process, individuals and/or organizations that wish to make public comments **must** provide factual comments based on compliance with the *Requirements for Recognition of Dental Specialties* and **must** refrain from making comments that are false, unprofessional and/or disparaging about the National Commission, the American Dental Association (ADA), any of the recognized dental specialty sponsoring organizations and/or certifying boards and the applicant organization.
- If the National Commission believes that an individual and/or organization has submitted false, unprofessional and/or disparaging comments, the National Commission will consider the submission a violation of its Policy on integrity and will disregard the entire submission.
- The National Commission reserves the right to report egregious violations of the ADA's Professional Conduct Policy to the ADA Council on Ethics, Bylaws and Judicial Affairs if the individual is an ADA member in good standing.



National Commission Communities of Interest

- As outlined in the National Commission's Application Process for Recognition of a Dental Specialty, the following communities of interest will be notified of the comment period:
 - 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 Education Programs
 - ADA Officers and Board of Trustees
 - Members, ADA House of Delegates
 - Members and Director, ADA Council on Dental Education and Licensure
- The National Commission will place an announcement in the ADA News and on the National Commission website at <https://ncrdscb.ada.org/news-and-meetings>



Comments on Applications for Recognition

- The National Commission will only accept signed written comments.
- If the National Commission receives form letters with duplicate content signed by different individuals, the letters will be counted as one (1) letter signed by multiple submitters.
- All comments are to be sent to the National Commission office via electronic mail at nationalcommission@ada.org prior to the close of the comment period.
- Comments received after the close of the comment period will not be considered by the Review Committee or Board of Commissioners.
- Individuals and/or organizations are prohibited from contacting members of the National Commission Board of Commissioners related to applications for recognition that are out for public comment.
- To better assist the communities of interest with interpreting the *Requirements for Recognition of Dental Specialties* and providing comments on applications for recognition, the National Commission designed a comment sheet that is posted on the National Commission's website during the comment period at <https://ncrdscb.ada.org/recognized-dental-specialties>



Requirements for Recognition of Dental Specialties

- There are six (6) *Requirements for Recognition for Dental Specialties* with some requirements having multiple components.
- Comments do not need to address all six (6) requirements for recognition.
- Comments must be relevant and succinctly address whether or not the application for recognition meets a specific *Requirement for Recognition*.

For example:

- Requirement 6 addresses whether the applicant organization has formal advanced education programs of at least two (2) academic years in length accredited by the Commission on Dental Accreditation (CODA).
 - A relevant response would be to state that the applicant organization either does or does not have CODA accredited advanced education programs that are a minimum of two (2) or more academic years in length in the discipline.
 - An irrelevant response would be to state that the advanced education programs are not needed when CODA accredited advanced education programs in the discipline currently exist.



Requirement 1

There are three (3) separate components to **Requirement 1** that must be met.

Please note that the absolute number of specialists and/or the number of members associated with the applicant sponsoring organization is not a consideration for this requirement.

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;

Interpretation: There may be different types of membership offered by the applicant sponsoring organization; however, a majority of the organizations active members must be made up of members in the area of practice that is seeking recognition.

Comments should be related to the following recommended documentation:

- Membership categories outlined in *Bylaws/Governance Manual*.
- Survey results of current members indicating the number practicing primarily in the proposed specialty.
- Trends in membership showing growth in the number of active members.



Requirement 1

(b) in which the privileges to hold office and to vote on any issue related to the specialty are reserved for dentists who have 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

Interpretation: Only dentist members who have completed a Commission on Dental Accreditation (CODA) accredited advanced education program or have sufficient experience in the proposed specialty can hold office and vote.

Comments should be related to the following recommended documentation:

- *Bylaws* provide clear language related to only dentists being allowed to hold office and vote.
- List of current officers of the applicant sponsoring organization.



Requirement 1

(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.

Interpretation: The applicant sponsoring organization has established a separate certifying board and/or has the ability to establish a separate certifying board.

Comments should be related to the following recommended documentation:

- *Bylaws* acknowledge a certifying board that has a close working relationship with the applicant sponsoring organization.



Requirement 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.

Interpretation: Comparison of the current CODA Accreditation Standards for Dental Education Programs (Predoctoral) to the current Accreditation Standards for Advanced Dental Education Programs in the proposed specialty to determine if the training, knowledge and skill is beyond that of dental school graduates.

Comments should be related to the following recommended documentation:

- Definition of the proposed specialty.
- Written documentation comparing and contrasting how the CODA Accreditation Standards for Advanced Dental Education Programs in the proposed specialty provides knowledge, skills and training that are greater than that of dental school graduates.



Requirement 3

There are two (2) separate components to **Requirement 3** that must be met.

The National Commission acknowledges that there is limited degree of overlap among all the recognized dental specialties.

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

Interpretation: Comparison of the current CODA Accreditation Standards for Advanced Dental Education Programs in the proposed specialty to the Advanced Dental Education Accreditation Standards of all the recognized dental specialties to ensure the proposed specialty has distinct knowledge, skills and training.

Comments should be related to the following recommended documentation:

- Written documentation explaining how the proposed specialty has distinct knowledge, skills and training that are unique to the proposed specialty.
- Written documentation comparing and contrasting the advanced knowledge, skills and training of the proposed specialty to each of the recognized specialties.



Requirement 3

(b) cannot be accommodated through minimal modification of any of the recognized dental specialties.

Interpretation: None of the recognized dental specialties could be modified to encompass the knowledge, skills and training provided in a proposed specialty.

Comments should be related to the following recommended documentation:

- Written documentation explaining how the proposed specialty has unique knowledge, skills and training that could not be modified to encompass the proposed specialty.
- Written parameters of care for the proposed specialty.



Requirement 4

There are four (4) separate components to **Requirement 4** that must be met.

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;

Interpretation: The proposed specialty promotes improvement in the field through sponsorship of a peer reviewed scientific journal, development of parameters of care, continuing education requirements, recertification requirements and engages in evidence-based, peer reviewed publications that contributes to the knowledge of the field.

Comments should be related to the following recommended documentation:

- Written evidence of sponsorship of a peer reviewed scientific journal.
- Written Parameters of Care for the proposed specialty.
- Written continuing education requirements for practitioners in the field.
- Written recertification/certification maintenance requirements for diplomates.
- List of evidence based, peer reviewed publications.



Requirement 4

(b) actively contributes to the educational needs of the discipline at the predoctoral, postdoctoral and continuing education levels;

Interpretation: Contributes to the education needs of the discipline at the predoctoral, postdoctoral and continuing education levels.

Comments should be related to the following recommended documentation:

- Survey results showing the number of part-time and full-time faculty members in the field employed by dental schools and/or post-graduate dental education programs that contribute to the teaching programs.
- List of sustained and ongoing continuing education programs that are utilized by the profession that are CCEPR/Joint Accreditation/State Dental Board recognized.

(c) actively engages in research that establishes evidence-based validity of therapy used by practitioners in the proposed or recognized specialty; and

Interpretation: Engages in current research that establishes the validity of therapy used by the practitioners in the proposed specialty.

Comments should be related to the following recommended documentation:

- List of research in the field that has been actively conducted and continually published over a period of years (15 years) in peer-reviewed journals up to the present time.

The expectation of the National Commission is that the published research is in widely known professional journals.



Requirement 4

(d) demonstrates a need for service that is not currently being met by general practitioners or any of the recognized dental specialties.

Interpretation: Shows a need for service that is not currently being met by general practitioners and/or the currently recognized dental specialties.

Comments should be related to the following recommended documentation:

- Written evidence showing a need for services by the proposed specialty that are not currently being met by general practitioners or recognized dental specialists.
- Written evidence showing new and emerging trends in the field.
- Referral patterns including documentation that identifies who normally refers patients to practitioners in the proposed specialty and the frequency of these referrals.



Requirement 5

A proposed or recognized specialty must have a direct benefit/impact on clinical patient care and meet the needs of its patient population.

Interpretation: The proposed specialty has a direct benefit/impact on clinical patient care and can meet the needs of its patient population.

Comments should be related to the following recommended documentation:

- Written evidence showing that the proposed specialty impacts clinical patient care and meets the needs of patients through the current and future number of practitioners in the field.
 - Number of dentists currently in practice who received two (2) or more academic years of formal advanced education in the proposed specialty.
 - Number of individuals who devote the majority (greater than 50%) of time to practice the discipline.
 - Projection of the need for practitioners in the specialty over the next five (5) years, taking into account disease trends, demographic changes and other pertinent factors.
 - Practice settings of the proposed specialty.



Requirement 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.

Interpretation: The proposed specialty must have advanced educational programs accredited by CODA that are a minimum of two (2) years in length.

Comments should be related to the following recommended documentation:

- Current copy of the CODA Standards for Advanced Dental Education Programs in the discipline.
- List of currently operational advanced education programs in the proposed specialty.
- Letter from each institution that has a CODA accredited advanced education program chief executive officer verifying sponsorship of the program.
- Written documentation discussing the adequacy of advanced education program enrollment, including future trends.
- Written description of minimum biomedical, behavioral and clinical science requirements.



Final Comments

- Following a comprehensive review of the application for recognition and public comments, the Review Committee on Specialty Recognition will make a recommended action to grant or deny specialty recognition to the Board of Commissioners.
- The Review Committee on Specialty Recognition is an advisory committee to the Board of Commissioners and the committee's recommended action is merely a recommendation. Only the Board of Commissioners can make the final decision.
- The recommended action of the Review Committee on Specialty Recognition is reviewed by the Board of Commissioners at its next regularly scheduled meeting.
- Within two (2) days of the conclusion of the Board of Commissioners regularly scheduled meeting, the National Commission will announce its decision if specialty recognition is granted. If specialty recognition is denied, the Board of Commissioners will not announce its decision based on the applicant's right to appeal the decision (See Policy on Due Process).
- Any comments, questions or concerns about the process should be submitted to the National Commission at nationalcommission@ada.org

