



National Commission on Recognition of
Dental Specialties and Certifying Boards

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Dr. Donna Thomas-Moses
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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specialties and certifying boards and properly identifies the specialties as disciplines in dentistry rather than the outdated terminology “area of dentistry”.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 diplomats.

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.

Dr. Donna Thomas-Moses

March 29, 2022

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Sincerely,

A handwritten signature in blue ink, appearing to read "Frank J. Tuminelli, DMD, FACP". The signature is stylized and cursive.

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~~ 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.
- 219

Certification Requirements:

- 220
- 221
- 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.~~