

Submitting Comments on
Applications for Specialty Certifying Board Recognition
and
Interpretation of the *Requirements for Recognition of
National Certifying Boards for Dental Specialists*

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 Certifying Board, after the Review Committee on Specialty Certifying Board 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 National Certifying Boards for Dental Specialists* 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 National Certifying Boards for Dental Specialists*. The National Commission will disregard comments that are not related to the *Requirements for Recognition of National Certifying Boards for Dental Specialists*.
- 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 Certifying Board 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 National Certifying Boards for Dental Specialists* 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 Certifying Board, 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 Certifying Board 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 National Certifying Boards for Dental Specialists* 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-certifying-boards>



Requirements for Recognition of National Certifying Boards for Dental Specialists

- The *Requirements for Recognition of National Certifying Boards for Dental Specialists* contains 14 requirements that are divided into three (3) sections:
 - Organization of Boards (4 requirements)
 - Operation of Boards (7 requirements)
 - Certification Requirements (3 requirements)
- Comments do not need to address all 14 *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:

Organization of Board- Requirement 2 addresses whether the applicant certifying board has a close working relationship with the specialty sponsoring organization that is recognized by the National Commission.

- A relevant comment would be to state that the applicant certifying board either does or does not have a close working relationship with the recognized specialty sponsoring organization.
- An irrelevant comment would be to state that another certifying board does not need to be recognized and there are other certifying boards that recognize dentists in the specialty.



Organization of Boards-Requirement 1

An applicant and a recognized certifying board must have no less than five (5) and no more than twelve (12) voting directors/officers designated on a rotation basis in accordance with a method approved by the National Commission. Although the National Commission does not recommend a single method for selecting directors/officers of boards, directors/officers may not serve for more than a total of nine (9) years. All voting directors/officers must be diplomates of that specific certifying board and the certifying board may establish additional criteria/qualifications if they so desire.

Interpretation: (a) There are no more than twelve (12) of voting directors/officers, (b) whose terms do not exceed a total of nine (9) years and (c) all directors/officers are diplomates.

Comments should be related to the following requested documentation: *Bylaws* provide language related to:

- The required number of voting directors/officers, which is no less than five (5) and no more than twelve (12) voting directors.
- The length of the directors/officers terms, which is no longer than nine (9) years total.
- The requirement that each director/officer is a diplomate of that specific certifying board.

Further requested documentation outside of the *Bylaws*:

- Written documentation outlining the boards selection process and membership criteria/qualifications and diplomate status requirement for directors/officers.
- A list of current voting directors/officers of the board.



Organization of Boards-Requirement 2

An applicant and a recognized certifying board must have a certification program that is comprehensive in scope and meets the needs of the diplomate practitioners in the recognized specialty and the profession and protects the public. Further, the certifying board must provide evidence of a close working relationship with a recognized specialty sponsoring organization that meets all of the *Requirements for Recognition of Dental Specialties*.

Interpretation: There is a specialty sponsoring organization recognized by the National Commission and there is a close working relationship between the applicant certifying board and recognized specialty sponsoring organization.

Comments should be related to the following requested documentation:

- Current Board *Bylaws* that provides evidence of the certifying boards close working relationship with the recognized specialty sponsoring organization that meets all of the *Requirements for Recognition of Dental Specialties*.



Organization of Boards-Requirement 2

Examples of a close working relationship may include:

- A statement of sponsorship of the certifying board by the recognized specialty sponsoring organization.
- Formal policy statements by the sponsoring organization and certifying board recognizing each other.
- Sponsoring organization and certifying board engaging in regular, formal communications.
- Attendance of leadership/liaisons representing the sponsoring organization/certifying board at annual meetings.
- The sponsoring organization's ability to make nominations to the certifying board's board of directors.
- Procedures acknowledging that the sponsoring organization may establish additional qualifications for diplomates who serve on the certifying board.
- Sponsoring organization providing continuing education courses that prepare diplomates for examination of the board as well as review courses as part of the re-credentialing process.
- Collaboration of review and revision of accreditation standards for advanced education programs in the specialty discipline. Although collaboration between the sponsoring organization and the certifying boards is the certifying board must be independent, bearing full responsibility for its required, program; the evaluation of qualifications and competence of those it certifies as diplomats; and financially independent from the sponsoring organization.



Organization of Boards-Requirement 3

An applicant and a recognized certifying board must provide evidence of adequate financial viability to conduct its certification program.

Interpretation: Examines financial viability of the certifying board.

Comments should be related to the following requested documentation:

- Copy of the previous year Financial Statement and/or Audit Report.



Organization of Boards-Requirement 4

This requirement only applies to certifying boards that outsource administrative functions and/or examination functions to individual(s) and/or agencies outside of the certifying board.

An applicant and a recognized certifying board may outsource administrative duties to suitable external consultants and/or external agencies to assist in daily operations and/or examination functions. If the certifying board does outsource administrative and/or examination functions, the certifying board must submit documentation describing the process. External and internal consultants who participate in the development and/or administration of certification examinations must be diplomates in the specialty that is being examined.

Interpretation: Outsourcing of administrative duties of the certifying board to external consultants/agencies to assist in daily operations and/or examination functions.

Comments should be related to the following requested documentation:

If the certifying board **does** outsource administrative and/or examination functions:

- The *Bylaws* or written documentation describes the process of selecting consultants or agencies and the duties these individuals/agencies fulfill for the organization.
- A copy of the Annual Report from the individual(s)/agency.

If the certifying board **does not** outsource administrative or examination functions to outside agencies, no evidence of compliance is required.



Operation of Boards-Requirement 1

An applicant and a recognized certifying board must only certify qualified dentists as diplomates in the specialty area recognized by the National Commission. No more than one (1) certifying board will be recognized by the National Commission for the certification of diplomates in a recognized specialty area of practice.

Interpretation: The certifying board is only certifying dentists as diplomates.

Comments should be related to the following requested documentation:

- Mission Statement
- Copy of *Bylaws* and/or documents providing evidence that the certifying board is only certifying dentists as diplomates.



Operation of Boards-Requirement 2

An applicant and a recognized certifying board must give at least one (1) examination in each calendar year and must announce examination details at least six (6) months in advance of the examination. In extraordinary circumstances, recognized certifying boards may request a conditional waiver of exception from the National Commission.

Interpretation: The certifying board gives at least one (1) examination yearly and properly posts announcements related to examination dates at least six (6) months in advance.

Comments should be related to the following requested documentation:

- Copy of announcement of examination(s) date and place posted by the certifying board
- Written description of where the information is posted
- Screenshot of certifying board website showing posting



Operation of Boards-Requirement 3

An applicant and a recognized certifying board must maintain a current list of diplomates.

Interpretation: The certifying board keeps a current list of diplomates.

Comments should be related to the following requested documentation:

- Current list of diplomates.



Operation of Boards-Requirement 4

An applicant and a recognized certifying board must submit to the National Commission data relative to financial viability and operations, written examination procedures, candidate examination guidelines and procedures, certification and recertification examination content, test construction and evaluation, and the reporting of results. Examination procedures and results should follow the Standards for Educational and Psychological Testing, including validity and reliability evidence. A diplomate in good standing may, upon written request, obtain a copy of the annual examination technical and financial reports of the certifying board. The recognized certifying board will submit the required documentation on a cycle established by the National Commission.

Interpretation: Validity and reliability of the examination to ensure the examination is properly testing what it is meant to be tested and whether all aspects of the test is unbiased.

The requirement also addresses a diplomates ability to be given access, via written request, to the annual technical report of the examination and the financial reports of the board.



Operation of Boards-Requirement 4

Comments should be related to the following requested documentation:

- Policy and/or public statement demonstrating the ability of diplomates who are in good standing, upon written request, to obtain information of the certifying boards' financial viability and examination technical reports.
- Written Examination Procedures
- Candidates Brochure/ Guidelines/Procedure for Certification Examination
- Certification and Recertification Examination Content Guidelines and Procedures, if Candidate Guide is not submitted

Requested documentation related to Test Construction and Evaluation:

- Validity and Reliability Evidence provided by a psychometrician/statistician who has included an introductory letter to accompany documents provided in support of this requirement
- Examination Technical Report
- Documentation/Policy related to Test Development and Revision
- Documentation/Policy related to Test Administration, Scoring and Reporting
- Policies on Fairness in Testing and Test Use
- Policies in the Rights and Responsibilities of Test Takers
- Policies on Testing Individuals of Diverse Linguistic Backgrounds
- Policies on Testing Individuals with Disabilities



Operation of Boards-Requirement 5

An applicant and a recognized certifying board must require diplomates to engage in lifelong learning and shall encourage continuous quality improvement.

Interpretation: Continuing education and recertification/certification requirements related to lifelong learning.

Comments should be related to the following requested documentation:

- Written Recertification/Certification Maintenance Policies.
- Written Continuing Education Practices and Requirements.



Operation of Boards-Requirement 6

An applicant and a recognized certifying board must provide to the National Commission evidence of examination and certification of a significant number of additional dentists in order to warrant approval of and continued recognition by the National Commission. The recognized certifying boards will submit the required documentation on a cycle established by the National Commission.

Interpretation: The certifying board gives a certification examination (at least once a year) for a number of additional practitioners commensurate to its size.

Comments should be related to the following requested documentation:

- Evidence of holding at least one (1) certification examination.

Please note that the number of practitioners in each of the recognized specialties varies, which has an impact on the number of examinations given in a year and the number of examinees in a specific discipline.



Operation of Boards-Requirement 7

An applicant and a recognized certifying board must bear sole authority and responsibility for conducting certification programs, the evaluation of the qualifications and competence of those certified as diplomates, and the issuance of certificates.

Interpretation: The certifying board is autonomous from the sponsoring organization and has sole authority to conduct its business related to the evaluation of qualification and competence of diplomates and the issuance of certification.

Comments should be related to the following requested documentation:

- Documentation showing the certifying board is an independent entity or *Bylaws* showing independent authority to act independently as the certification body (articles of incorporation)
- Certificate that clearly indicates proof as certifying body and not sponsoring organization



Certification Requirements-Requirement 1

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

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

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



Certification Requirements-Requirement 1

Interpretation: Provides analysis into the following areas:

- Eligibility requirements for diplomates that have successfully completed an advanced education program accredited by the Commission on Dental Accreditation (CODA) that is a minimum of two (2) academic years in length..
- Eligibility requirements for diplomates who attended an advanced education program on a part-time basis and completed the program with four (4) academic years in length.

Please note that not all advanced education programs accredited by CODA allow for part-time attendance

- Alternate pathways to certification for diplomates that have not graduated from a CODA accredited advanced education program.

Comments should be related to the following requested documentation:

- Written eligibility requirements for certification showing completion of a CODA accredited advanced education program that is two (2) or more years in length.
- If the recognized specialty does allow part-time attendance, there is written evidence related to eligibility and the length of the part-time program.
- Alternative Pathways to Certification
 - If there are alternate pathways to certification, there is written evidence related to equivalency or other measures to demonstrate equal scope and level of knowledge.



Certification Requirements-Requirement 1

Please note the following with regard to Alternative Pathways to Certification:

An alternate pathway is an eligibility pathway for individuals with **unique** circumstances such as an internationally-educated dentist who has accepted a full-time, teaching appointment in the discipline in a CODA accredited predoctoral or postdoctoral education program or for individuals who have been practicing exclusively in the discipline for many years prior to the establishment of the CODA-accredited programs.

Alternative pathways are not for individuals who have graduated from non-accredited, U.S. based advanced education programs.



Certification Requirements-Requirement 2

An applicant and a recognized certifying board must establish minimum requirements for years of practice in the area for which certificates are granted. The years of advanced education in the discipline specific specialty may be accepted toward fulfillment of this requirement.

Interpretation: Review of minimum eligibility requirements for certification.

Comments should be related to the following requested documentation:

- Written documentation related to minimum requirements for certification.



Certification Requirements-Requirement 3

An applicant and a recognized certifying board, in cooperation with their recognized specialty sponsoring organization, must prepare and publicize joint recommendations on the Commission on Dental Accreditation educational standards for the advanced education programs for that specialty.

Interpretation: Evaluates whether the certifying board and sponsoring organization work together in developing educational standards and experiential requirements.

Comments should be related to the following recommended documentation:

- Comments made to Commission on Dental Accreditation discipline specific Accreditation Standards
- Evidence that certifying board and sponsoring organization meet on a regular basis to review educational program standards and experiential requirements



Final Comments

- Following a comprehensive review of the application for recognition and public comments, the Review Committee on Specialty Certifying Board Recognition will make a recommended action to grant or deny specialty recognition to the Board of Commissioners.
- The Review Committee on Specialty Certifying Board 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 Certifying Board 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 certifying board recognition is granted. If specialty certifying board 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

