

CONFIDENTIALITY POLICY

Certain materials generated and received by the National Commission on Recognition of Dental Specialties and Certifying Boards are confidential and must not be improperly disclosed. The National Commission's Confidentiality Policy applies to all documentation generated by the National Commission Board of Commissioners, the Review and Standing Committees and the Appeal Board. Confidential materials are maintained to ensure the integrity of the specialty recognition process, and may be shared by the National Commission in instances related to responding to state or federal legal requirements, as appropriate. Confidentiality applies without limitation, to the following documents and to the information contained in those documents:

Specialty Recognition Applications: After an application for recognition has been reviewed by the director of the National Commission to ensure that the required documentation including appendices have been submitted, the National Commission will publish an announcement to the public that the application has been received but will not release any information contained in the document. In the case of incomplete applications, receipt of the application will remain confidential and no public announcement will occur. The National Commission will not release any information contained in the application without first informing the sponsoring organization. Applications rejected by the National Commission are not released, unless prior written approval is obtained by the sponsoring organization. All documentation in the application for recognition is confidential until the respective Review Committee has reviewed the documentation for completeness and the application is ready to be circulated for public comment. If an application for recognition has been circulated for comment, all comments will remain confidential.

Protected Health Information: The National Commission does not accept documents with Patients' Protected Health information (PHI) and/or Personally Identifiable Information (PII) in the application/annual reports/periodic reviews by a sponsoring organization or a certifying board. Applications/annual reports/periodic reviews will be returned to the organization for removal of any PHI/PII contained within the document. The National Commission does not accept comments from the communities of interest that contain PHI/PII. The submitting organization or individual will be informed that the comment has been destroyed and that a new comment needs to be submitted without any PHI/PII.

Surveys: Routinely gathered data is used in the recognition of the certifying boards. The National Commission may release to the public any portion of survey data that is collected annually unless the terms of confidentiality for a specific section are clearly indicated on the survey instrument. Subsections of each survey instrument containing data elements which are confidential are clearly marked.

Meeting Materials and Discussions: Background reports and informational materials related to the recognition of proposed dental specialties, the recognized dental specialties, proposed certifying boards and the recognized certifying boards are regularly prepared for review by the National Commission. These materials and all discussions related to recognition and/or re-recognition shall remain confidential. The National Commission determines when, and the manner in which, newly adopted policy and informational reports will receive public distribution.

Meetings: All business conducted during the National Commission Board of Commissioners meeting including the review of policy, finances and discussions related to the recognition and/or re-recognition of dental specialties and certifying boards is confidential and conducted in closed session. All deliberations of the Appeal Board are confidential and conducted in closed session. All business conducted during Review and Standing Committee meetings is confidential and conducted in closed session.

Adopted 5/18; Revised 3/19, 3/20, 3/22