National Commission on Recognition of Dental Specialties and Certifying Boards Guidelines for Submitting Comments on Applications for Recognition

As part of the National Commission's Application Process for Recognition of a Dental Specialty Certifying Board, after the Review Committee makes the determination that the application is complete, as part of the review process, 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 **<u>objective</u>** and pertain only to the applicant's compliance with the *Requirements for Recognition of Dental Specialties*. The National Commission will disregard comments that are not related to the *Requirements for Recognition of Dental Specialties*. Comments that are not objective and/or include Protected Health Information (PHI) and/or Personally Identifiable Information (PII), or violate the American Dental Association's Principles of Ethics and Code of Professional Conduct, or contain unprofessional remarks will be disregarded. 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.

To better assist the communities of interest with interpreting the *Requirements for Recognition of National Certifying Board for Specialists* and providing comments on applications for recognition, the National Commission has designed the following comment sheet that is to be submitted for all public comments.

Requirement for Recognition	Interpretation of Requirement	Initial Compliance with this Requirements Necessitates
Organization of Boards- Requirement 1:		
Each Board shall have no less than five or more than 12 voting directors, 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 Commission does not prescribe a single method for selecting directors of boards, members may not serve for more than a total of nine years.	This requirement addresses whether the number of voting directors, whose terms shall not exceed a total of nine (9) years are all diplomates.	The applicant's Bylaws meet the required number of voting directors. The terms on the board directors in the applicants Bylaws meets the maximum nine (9) year term limit.

Requirements for Recognition of National Certifying Boards for Dental Specialists

Membership on the board shall be in accordance with a prescribed method endorsed by the sponsoring organization. All board directors shall be diplomates of that board and only the sponsoring organizations of boards may establish additional qualifications if they so desire. Organization of Boards- Requirement 2:		The applicant provided evidence that the board directors are all diplomates.
Each board shall submit in writing to the National Commission on Recognition of Dental Specialties and Certifying Boards a program sufficiently comprehensive in scope to meet the requirements established by the American Dental Association for the operation of a certifying board. This statement should include evidence of sponsorship by the board by a national organization that meets all the elements of Requirement 1 of the <i>Requirements for</i> <i>Recognition of Dental</i> <i>Specialties.</i>	This requirement addresses the close working relationship between the certifying board and sponsoring organization.	The applicant provided evidence of a close working relationship with the sponsoring organization that is recognized by the National Commission.

Organization of Boards- Requirement 3: Each Board shall submit to the National Commission on Recognition of Dental Specialties and Certifying Boards evidence of adequate financial support to conduct its	This requirement addresses the financial viability of the certifying board.	The applicant provided a copy of its previous year Financial Statement or Audit Report.
Organization of Boards- Requirement 4:	This requirement only applies to certifying boards that outsource administrative functions and/or development of examinations to agencies outside of the certifying board.	
Each Board may select suitable consultants or agencies to assist in its operations, such as the preparation and administration of examinations and the evaluation of records and examination of candidates.	The requirement addresses the outsourcing of administrative duties of the certifying board to external agencies to run the daily operations and/or develop the examination content.	The applicant does not outsource administrative or examination functions to outside agencies. If the applicant does outsource administrative and/or examination functions the organizations Bylaws describe the process of selecting consultants or agencies, the duties of these individuals/agencies and a copy of the Annual Report
Consultants who participate in clinical examinations should be diplomates.	This requirement also addresses that consultants participating in the development and administration of the examination are diplomates.	from the individual(s)/agency.

Operation of Boards- Requirement 1: Each board shall certify qualified dentists as diplomates only in the special area of dental practice approved by the National Commission on recognition of Dental Specialties and Certifying Boards for such certification. No more than one board be recognized for the certification of diplomates in a single area of	This requirement addresses whether the mission and/or Bylaws of the organization provides evidence that it is only certifying dentists as diplomates.	The applicant provided a copy of the mission statement and Bylaws showing proof that the organization only certifies dentists as diplomates.
practice. Operation of Boards- Requirement 2: Each board, except by waiver of the National Commission on Recognition of Dental Specialties and Certifying Boards, shall give at least one examination in each calendar year and shall announce such examination at least six months in advance.	This requirement addresses whether 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.	The applicant provided a copy of the announcement of examination(s) date/place and a written description of where the information is posted.
Operation of Boards- Requirement 3: Each board shall maintain a current list of its diplomates.	This requirement addresses whether the certifying board keeps a current list of diplomates.	The applicant provided a current list of applicants.

Operation of Boards- Requirement 4: Each Board shall submit annually to the National Commission on Recognition of Dental Specialties and Certifying Boards data relative to its financial operations, applicant admission procedures, and examination content and results.	This requirement has numerous components related to different reports and polices.	
Examination procedures and results should follow the Standards for Educational Psychological Testing, including validity and reliability evidence.	This requirement addresses the validity and reliability of the examination to ensure the examination is properly testing what it is meant to be testing and whether all aspects of the test is unbiased.	 The applicant provided the following documentation: Candidate Brochure/Guidelines/Procedures for Certification or Examination Content Examination Technical Report Test Development and Revisions Process Test administration, Scoring and Reporting Process Policy on Fairness in Testing and Test Use Policy on Rights and Responsibilities of Test Takers Policy on Testing Individuals of Diverse Linguistic Backgrounds Policy on Testing Individuals with Disabilities
		The applicant provided policy and/or public statements demonstrating diplomates ability to obtain information on the annual financial report.
	This requirement also addresses whether the certifying board has	The applicant Provided policy and/or public statements demonstrating diplomates ability to obtain information on the technical report of the examination.

A diplomate may, upon request, obtain a copy of the annual technical and financial report of the board.	policy or public statements demonstrating that upon written request, diplomates can obtain information on the boards annual financial reports and technical report of the examination.	
Operation of Boards- Requirement 5:		
Each board shall encourage its diplomates to engage in lifelong learning and continuous quality improvement.	This requirement addresses whether the certifying board has continuing education and recertification/certification requirements related to lifelong learning.	The applicant provided recertification/certification requirements encouraging lifelong learning for diplomates. The applicant provided continuing education requirements encouraging lifelong learning for diplomates.

Operation of Boards- Requirement 6: Each board shall provide periodically to the National Commission on Recognition of Dental Specialties and Certifying Boards evidence of its examination and certification of a significant number of additional dentists in order to warrant its continued approval by the National Commission on Recognition of Dental Specialties and Certifying Boards.	It is important to 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 area. This requirement addresses whether the certifying board gives a certification examination (at least once a year) for a significant number of additional practitioners based on its size.	The applicant provided evidence of holding at least yearly a certification examination. The applicant provided evidence of certification of additional practitioners based on its size.
Operation of Boards- Requirement 7:		
Each board shall bear full responsibility for the conduct of its program, the evaluation of the qualifications and competence of those it certifies as diplomates, and the issuance of certificates.	This requirement addresses whether the certifying board is independent from the sponsoring organization and has full authority to conduct its business related to the evaluation and competence of diplomates and the issuance of certification.	The applicant provided evidence of its full authority and independence from the sponsoring organization to conduct its business in the evaluation and competence of diplomates and issuance of certification.
Operation of Boards- Requirement 8:		
Each board shall require an annual registration fee from each of its diplomates intended to assist in supporting financially the continued program of the board.	This requirement addresses the financial viability of the board with regard to charging diplomates an annual registration fee.	The applicant provided evidence of an annual registration fee for diplomates.

Certification Requirements- Requirement 1:		
Each board shall require, for eligibility for certification as a diplomate, the successful completion of an advanced education program accredited by the Commission on Dental Accreditation of two or more academic years in length, as specified by the Commission.	This requirement addresses eligibility requirements for diplomates that have successfully completed an advanced education program accredited by CODA.	The applicant provided eligibly requirements for certification showing completion of a CODA accredited advanced education program that is two (2) or more years in length.
Although desirable, the period of advanced study need not be continuous, nor completed within successive calendar years. An advanced education program equivalent to two 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 calendar years, may be considered acceptable in satisfying this requirement. Short continuation and refresher courses and teaching experience in specialty departments in dental schools will not be accepted in meeting any portion of this requirement.	This requirement also addresses diplomates who attended an advanced education program on a part-time basis and completed the program with four (4) years. <i>Please note that not all advanced education programs accredited by</i> <i>CODA allow for part-time attendance.</i>	The specialty allows part-time attendance in an advanced education program. If the the specialty does allow part-time attendance, the applicant provided evidence related to the length of the part- time program.

Each board may establish an exception to the qualification requirement of completion of an advanced specialty education program accredited by the Commission on Dental Accreditation for the unique candidate who has not met this requirement per se, but can demonstrate to the satisfaction of the certifying board, equivalent advanced specialty education. A certifying board must petition the National Commission on Recognition of Dental Specialties and Certifying Boards for permission to establish such a policy.	This requirement addresses whether there are alternate pathways to certification for diplomates that have not graduated from a CODA accredited advanced education program.	The applicant does not have alternate pathways to certification. All diplomates must have graduated from a CODA accredited program. The applicant does have alternate pathways to certification and provided evidence of these alternate pathways to certification for diplomates who have graduated from a CODA accredited institution.
Certification Requirements- Requirement 2: Each board shall establish its minimum requirements for years of practice in the area for which is grants certificates. The years of advanced education in this area may be accepted toward fulfillment of this requirement.	This requirement addresses minimum eligibility requirements for certification.	The applicant provided evidence related to the establishment of minimum requirements for certification.

Certification Requirements- Requirement 3:		
Each board, in cooperation with its sponsoring organization, shall prepare and publicize its recommendations on the educational program and experience requirements which candidates will be expected to meet.	This requirement addresses whether the certifying board and sponsoring organization work together in developing the educational standards and the experiential requirements.	The applicant provided evidence that the certifying board and sponsoring organization work together to provide comments to the Commission on Dental Accreditation on advanced education program. The applicant provided evidence that the certifying board and sponsoring organization meet on a regular basis to review educational program standards and experiential requirements.