

January 11, 2011

CALL FOR WRITTEN COMMENTS

Proposed Changes to the ADA CERP Eligibility Criteria

Proposed Changes

The ADA's Council on Dental Education and Licensure (CDEL) and its Continuing Education Recognition Program (CERP) Committee are considering modifications to the Eligibility Criteria for participation in ADA CERP. The Council is proposing that "commercial entities," defined by CERP as companies that produce, market, re-sell or distribute health care goods or services consumed by, or used on, patients should no longer be eligible to apply to become ADA CERP approved providers of continuing dental education (CE).

The proposed change would only apply to companies that manufacture or market healthcare products or services. It would not apply to dental organizations or schools, education companies, or providers of patient care such as hospitals, group practices, etc. A list of the types of continuing education providers that would continue to be eligible to apply for ADA CERP recognition is contained in the proposed revisions to the CERP Eligibility Criteria below. The proposed change to the Eligibility Criteria would *not* prohibit commercial entities from supporting CE activities. Commercial support would still be acceptable in accordance with existing CERP guidelines outlined in Standard V of the ADA CERP Recognition Standards.

Why is the CDEL proposing these changes?

The Council is considering this change in response to increased public, professional and governmental concerns regarding conflicts of interest and commercial bias in the healthcare professions. Concerns that some relationships between industry and healthcare professionals create conflicts of interest that may adversely affect professionals' objectivity and undermine the public trust have lead professional organizations, regulatory agencies and several state governments to call for stronger measures to regulate these relationships to minimize conflicts of interest.

The Council believes that collaboration between industry and dental professionals may have many benefits and lead to improvements in oral healthcare. Commercial entities will still be able to provide support (grants or equipment, for example) for CE activities offered by *independent* CE providers, such as dental schools and dental societies, in accordance with guidelines outlined in Standard V of the [ADA CERP Recognition Standards](#). Standard V describes acceptable procedures for managing external support for CE and minimizing potential conflicts of interest. Commercial entities could also continue to offer training. However, if the revised Eligibility Criteria are implemented, they would no longer be eligible to be ADA CERP approved providers of CE.

How would these changes impact current CE providers?

If approved, the revised ADA CERP Eligibility Criteria would also be consistent with those of accrediting agencies for certain other healthcare professions. The Accreditation Council for Continuing Medical Education (ACCME), the Accreditation Council for Pharmacy Education (ACPE), and the American Nurses Credentialing Center (ANCC) do not consider the manufacturers and marketers of drugs and medical devices eligible for accreditation. The Council would phase in the revised Eligibility Criteria in 2 stages. Beginning in January 2013 no new applications for recognition would be accepted from providers considered commercial entities. The recognition status of currently approved commercial entities could be maintained through December 2013.

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How will the final decision be made?

In accordance with established procedures, the Council has directed that the proposed revisions to the ADA CERP Eligibility Criteria be circulated among the communities of interest for review and comment. The Council will consider comments and take action on the revisions at its November 2011 meeting.

Let the CDEL know what you think about the proposed changes

All interested parties are invited to submit written comments on the attached proposed revisions by **July 1, 2011**. Comments may be forwarded by e-mail, fax or mail to cerp@ada.org, Fax: 312-440-2915, or ADA CERP, 211 East Chicago Ave, Chicago, IL 60611. If you have any questions, please contact the ADA CERP manager, Ms. Mary Borysewicz, at borysewicz@ada.org or 800-622-8099, x2704.

Sincerely,

Dr. Brian Kennedy
Chair, Council on Dental Education and Licensure

Dr. Jade Miller
Chair, ADA CERP Committee

Proposed Revisions to ADA CERP Eligibility Criteria

November 2010

Proposed additions underlined; proposed deletions in ~~strikethrough~~

ELIGIBILITY:

The ADA CERP approves providers as defined in the Lexicon of Terms in the ADA CERP *Recognition Standards and Procedures*. The ADA CERP recognizes providers of continuing dental education (CDE), not individual courses. Institutions, organizations or major units or departments within an institution/organization (e.g., an oral and maxillofacial surgery department of a medical center) are eligible to apply for recognition. Any provider of CDE meeting the ADA CERP standards and criteria and the following requirements will be eligible to apply for recognition. CDE providers submitting an application must meet the following eligibility criteria:

1. ADA CERP considers the following types of continuing education providers to be eligible to apply for recognition:

- Dental schools
- Colleges and universities
- ADA constituent societies
- ADA component societies
- Government organizations
- National dental professional membership organizations
- Dental education companies
- Communications/publishing companies
- Non-health care related companies
- Insurance companies
- Group dental or medical practices
- Hospitals
- Managed care companies
- Health care delivery systems
- Study clubs
- Dental labs
- 501c non-profit organizations
- Individuals who are continuing dental education providers

Commercial interests are *not* eligible for recognition. A commercial interest is defined in the ADA CERP Lexicon of Terms as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by or used on patients. ADA CERP does not consider providers of clinical service directly to patients to be commercial interests.

A continuing education provider affiliated with a commercial interest may be ineligible for ADA CERP recognition; for example, if the provider is employed by a commercial interest to provide a continuing education course, or provides a course as an agent of or advocate for a commercial interest or pursuant to a contract with a commercial interest.

- 4 ~~2~~. The CDE provider must offers a planned program of continuing dental education activities consistent with the definition of continuing dental education provided in the Lexicon of Terms. ~~The CDE provider must demonstrate oversight by an independent advisory committee~~ The provider must present continuing dental education on a regular and recurring basis. The provider must have offered a planned program of CDE activities for at least 12 months. If the provider organization has not offered a course during the 12 months immediately preceding the application date the provider may apply for a one-year term of recognition. The CDE provider must demonstrate oversight by an independent advisory committee.
- ~~2~~ 3. A CDE provider must ensure that all courses offered have a sound scientific basis in order to adequately protect the public. ADA CERP reserves the right to require that the applicant provide documentation that courses offered by the provider have a sound scientific basis, proven efficacy, and promote public safety.
- ~~3~~ 4. The CDE provider must demonstrate that it assumes the financial and administrative responsibility of planning, publicizing and offering the continuing education program consistent with the definition of provider in the Lexicon of Terms.
- 4 5. The CDE provider must ensure that the educational methods are appropriate to the stated objectives for the activity and, when participation is involved, enrollment must be related to available resources to assure effective participation by enrollees.
- ~~5~~ 6. The CDE provider must ensure that the facilities selected for each activity are appropriate to accomplishing the educational method(s) being used and the stated educational objectives.

When there is a question regarding eligibility, ADA CERP reserves the right to make decisions on the issue.

Although ADA CERP may not directly benefit some smaller groups, such as local CE study clubs, such groups are encouraged to explore possible affiliation agreements with their local or state dental societies.