



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
PO Box 47852 · Olympia Washington 98504-7852

## DENTAL QUALITY ASSURANCE COMMISSION DENTAL CONTINUING COMPETENCY COMMITTEE WEBINAR MEETING AGENDA

**DATE:** Wednesday, July 8, 2020

**TIME:** 12:00 p.m.

**LOCATION:** Webinar

**CONTACT:** Jennifer Santiago, Health Services Consultant 4  
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Times and Order: The meeting will commence at 12:00 p.m. on July 8, 2020 and continue until agenda items are completed. Public comment will be taken during the committee meeting. This agenda is subject to change.

Accessibility: This meeting is accessible to persons with disabilities. Special aids and services can be made available upon request. If you need assistance with special needs and services, you may leave a message with that request at 1-800-525-0127. If calling from outside Washington State, dial 360-236-4052. TDD may also be accessed by calling the TDD relay service at 1-800-833-6388. If you need assistance due to a speech disability, Speech-to-Speech provides human voices for people with difficulty being understood. The Washington Speech-to-Speech toll free access number is 1-877-833-6341. If you wish to receive general information about this meeting, please call the program at 360-236-4893.

### **OPEN SESSION - 12:00 p.m.**

#### **1. CALL TO ORDER – Dr. Marsh, Committee Chairperson**

- 1.1. Roll call of committee members and staff.
- 1.2. Approval of agenda.
- 1.3. Approval of the March 6, 2020 meeting minutes.

#### **2. SPECIALTY ADVERTISING**

- 2.1. The committee will discuss, commission, committee, and stakeholder comments.
- 2.2. The committee will discuss rule modifications to WAC 246-817-420 Specialty representation.

### **3. FUTURE BUSINESS**

The committee will determine information needed for the next committee meeting.

### **4. ADJOURN**

Webinar Instructions:

Please register for Dental Continuing Competency Committee on Jul 8, 2020 12:00 PM PDT at:

<https://attendee.gotowebinar.com/register/1250794939925479180>

After registering, you will receive a confirmation email containing information about joining the webinar.



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**DENTAL QUALITY ASSURANCE COMMISSION  
DENTAL CONTINUING COMPETENCY COMMITTEE  
MEETING MINUTES  
Friday, March 6, 2020**

**MEMBERS PRESENT**

Ronald Marsh, DDS, Committee Chair  
Julia Richman, DDS  
David Carsten, DDS

**MEMBERS ABSENT**

Karla Briggs, Public Member  
Lyle McClellan, DDS

**STAFF PRESENT**

Jennifer Santiago, Program Manager  
Trina Crawford, Executive Director  
Becky McElhiney, Assistant Program  
Manager  
Heather Carter, Assistant Attorney General  
Bill Kellington, Supervising Staff Attorney

**OTHERS PRESENT**

Emily Lovell, Washington State Dental  
Association (WSDA)  
Sophie Doumit, WSDA  
Bryan Edgar, DDS, WSDA  
Michelle Neal, DDS, Washington State  
Society of Orthodontists (WSSO)  
Jennifer Zbaraschuk, Washington Dental  
Hygienists' Association (WDHA)  
Danielle Mora, WDHA  
Gianna Hartwig, American Association of  
Orthodontists (AAO)  
Charlie Hall, DDS  
Terre Harris, Harrisbiomedical

**OPEN SESSION**

1. **CALL TO ORDER** – The meeting was called to order at 8:07 a.m.
  - 1.1. The committee, staff and attendees were introduced.
  - 1.2. The committee approved the agenda as presented.
  - 1.3. The committee approved the October 25, 2019 meeting minutes as presented.
  
2. **SPECIALTY ADVERTISING RULE**
  - 2.1. The committee discussed commission, committee and stakeholder comments.
    - Ms. Hartwig indicated that the American Association of Orthodontists (AAO) urges the committee to consider the language from their draft.
    - Ms. Hartwig shared positions about the rule held by the AAO:

- The AAO discourages including section 4c and believes the information in items 1-4(b) sufficiently cover what needs to be addressed.
  - The only Department of Education (DOE) accredited organization is the Commission of Dental Accreditation (CODA), so naming the organization is redundant.
  - The language in the draft is stronger because it defers to a federal agency rather than a private organization.
  - The public equates specialties with higher education.
  - Other states such as Louisiana, Wyoming, Utah and Oregon are adopting the language in sections 1-4(b).
  - Dr. Edgar indicated that the Washington State Dental Association (WSDA) supports the comments submitted by the AAO.
  - The committee discussed comments submitted by the WSDA
    - Ms. Lovell indicated that the letter is reiterating comments made previously by the WSDA.
    - The WSDA does not think the rule should be based on a situation that does not yet exist.
    - The WSDA has concerns with the dental commission being an approving authority to recognize specialties.
    - Dr. Edgar indicated that he agreed with Ms. Lovell's comments and that the recognition of specialties in section 4(b) allows for specialties outside the ten called out specifically by CODA.
    - Dr. Richman indicated that she is more comfortable recognizing specialties that have two years of education from a CODA accredited program.
    - Dr. Richman expressed her priority of the rule being defensible and expressed concerns about relying on the ADA versus a federal agency.
    - Dr. Edgar shared that oral medicine is being considered by the ADA as a potential newly recognized specialty and the ADA is not politicized.
  - The committee discussed comments received from the Washington State Society of Oral and Maxillofacial Surgeons (WSSOMS) and the American Association of Oral and Maxillofacial Surgeons (AAOMS).
    - Dr. Edgar indicated that the WSDA supports this approach.
    - The letter from WSSOMS is not recommending any changes to WAC 246-817-420.
    - Ms. Hartwig clarified that the two letters are not in disagreement, the difference is regarding recognizing new specialties.
- 2.2. The committee discussed proposed rule modifications to WAC 246-817-420 Specialty representation.
- Dr. Richman expressed her opinion that if section 4(c) were left out, the result would be a strong, defensible rule. Dr. Richman shared that she would be in support of taking the draft to the commission for approval without subsection 4(c).
  - Ms. Carter shared that the language came about as a result of litigation, and that previously the commission was designated to approve new specialties.

- Dr. Marsh expressed concerns that not all dentists are American Dental Association (ADA) members, and that CODA may not mean much to them. Dr. Marsh expressed his opinion that the first two sentences in section 4(c) are the points of contention and suggested the commission make modifications to sections 1(a) and 4(c) to add an explanatory or reason statement.
- Dr. Marsh shared the recommendations made by the ADA in 2018 to establish minimum standards, conclusion, and flexibility.
- Dr. Marsh suggested deleting the word “general” from section 4(b) as recommended by a stakeholder.
- Dr. Edgar shared information about the DOE process and stated that they recognize accreditors such as CODA but do not recognize specialties specifically.
- Dr. Richman expressed her opinion that the topic has been discussed thoroughly and it is clear that there will not be complete consensus. Dr. Richman suggested removing section 4(c) and presenting to the commission for approval.
- Dr. Marsh suggested leaving section 4(c) but deleting the first two sentences.
  - Ms. Carter clarified that would still designate the commission to approve new specialties.
  - Dr. Richman expressed concerns that specialty approval activity would take up a lot of commission and committee time.
- Ms. Lovell stated her support for removing section 4(c).
- Ms. Hartwig stated her support for removing section 4(c), as well as her opinion that it complies with the ADA recommendations, is defensible and minimal, and that it is not the commission’s responsibility to recognize specialists.
- Ms. Carter stated that section 4(a) has uses “or” in the verbiage inappropriately, she will work with Ms. Santiago to revise.

### 3. FUTURE BUSINESS

The committee will bring the proposed rule to the commission for further discussion.

### 4. ADJOURN

The meeting was adjourned at 8:46 a.m.

Submitted By:

Committee Approval By:

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Jennifer Santiago, Program Manager

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Ronald Marsh, DDS, Committee Chair

# Item 2.1

Specialty Representation  
WAC 246-817-420  
COMMENTS Received  
April – June 2020

#	Date	From	Summary	Action
1	3/30/20	Rashmi Mishra	Oral medicine has been recognized as a dental specialty by ADA. Will it be included in the specialty by the WA department of health.  <a href="https://www.ada.org/en/publications/ada-news/2020-archive/march/oral-medicine-recognized-as-a-dental-specialty">https://www.ada.org/en/publications/ada-news/2020-archive/march/oral-medicine-recognized-as-a-dental-specialty</a>	
2				
3				

## Item 2.2

AMENDATORY SECTION (Amending WSR 95-21-041, filed 10/10/95, effective 11/10/95)

**WAC 246-817-420 Specialty representation.** (~~((1) It shall be misleading, deceptive or improper conduct for a dentist to represent or imply that he/she is a specialist or use any of the terms to designate a dental specialty such as:~~

- ~~(a) Endodontist~~
- ~~(b) Oral or maxillofacial surgeon~~
- ~~(c) Oral pathologist~~
- ~~(d) Orthodontist~~
- ~~(e) Pediatric dentist~~
- ~~(f) Periodontist~~
- ~~(g) Prosthodontist~~
- ~~(h) Public health~~

~~or any derivation of these specialties unless he/she is entitled to such specialty designation under the guidelines or requirements for specialties approved by the Commission on Dental Accreditation and the Council on Dental Education of the American Dental Association, or such guidelines or requirements as subsequently amended and approved by the DQAC, or other such organization recognized by the DQAC.~~

~~(2) A dentist not currently entitled to such specialty designation shall not represent that his/her practice is limited to providing services in a specialty area without clearly disclosing in the representation that he/she is a general dentist. A specialist who represents services in areas other than his/her specialty is considered a general dentist.) In order to protect the public from inherently misleading claims of specialty expertise by dentists who are not adequately trained and experienced, the following requirements allow dentists to avoid deception of the public with accurate advertising and representation.~~

(1) A licensed dentist has the legal authority to practice in all areas of dentistry as defined in RCW 18.32.020 and also the authority to confine their practice in areas within the scope of their education, training, and experience and in accordance with chapters 18.32 RCW and 246-817 WAC.

(2) A licensed dentist may advertise or represent themselves as a specialist if the dentist meets the standards listed in subsection (4) of this section.

(3) A licensed dentist who does not meet the standards listed in subsection (4) of this section shall be considered a general dentist. A general dentist is permitted to render specialty services but shall not advertise or represent themselves as a specialist in the areas listed in subsection (4) of this section.

(4) A licensed dentist must comply with one of the following requirements before advertising or representing themselves as a specialist in Washington:

(a) Successfully complete a commission on dental accreditation postdoctoral education program at least two years in length, and is recognized by the National Commission on Recognition of Dental Specialties and Certifying Boards in one of the following specialty areas:

- (i) Dental anesthesiology;
- (ii) Dental public health;
- (iii) Endodontics;
- (iv) Oral and maxillofacial pathology;

- (v) Oral or maxillofacial surgery;
- (vi) Oral and maxillofacial radiology;
- (vii) Orthodontics and dentofacial orthopedics;
- (viii) Pediatric dentistry;
- (ix) Periodontics; or
- (x) Prosthodontics.

(b) Successfully complete a commission on dental accreditation advanced educational program or program of any other accreditors recognized by the United States Department of Education which is at least two years in length in a special interest area of dentistry not listed in (a) of this subsection.

(5) It shall be misleading, deceptive, or unprofessional conduct for a licensed dentist to advertise or represent themselves by adopting or using any title to the public as a dental specialist, expert, board certified, or diplomate practicing in an area when they have not successfully completed the requirements specified for the dental specialty listed in subsection (4) of this section.

(a) A licensed dentist in a group practice must be identified as a general dentist or a specialist as listed in subsection (4) of this section.

(b) A licensed dentist in a group practice whom meets the standards listed in subsection (4) of this section shall include the area of their specialty.

(c) Names and qualification of any licensed dentist must be made available to the public upon request.