



2015 ADHA Strategic Plan

EDUCATION

Goal: Dental hygiene professionals will be prepared for the evolving scope of professional practice and settings.

ALLIANCES

Goal: ADHA is better positioning the profession to be viewed as an integrated part of the healthcare system through strategic partnerships.

ADVOCACY

Goal: The profession of dental hygiene will advance at the state and federal level.

The Federal Trade Commission & The Commission on Dental Accreditation





BACKGROUND

The Commission on Dental Accreditation (CODA)
accredits dental schools as well as advanced dental education programs and allied dental education programs in the United States.

- ADHA encouraged CODA to fully develop accreditation standards that reflect the progress and current practice of dental therapy education programs.
- CODA releases first draft of accreditation standards.
- First set of standards do **NOT** include a dental hygiene track.
- In 2013, ADHA led the effort for CODA to strongly consider a modification of the proposed dental therapy standards to provide for a dental hygiene-based dental therapy track.



ADHA Approaches United States Federal Trade Commission

March 2013

December 2013

February 2014



FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS



Outside Federal Trade Commission headquarters in Washington, D.C., are left to right: ADHA Executive Director Ann Battrell, MSDH; ADHA Director of Governmental Affairs Ann Lynch and ADHA Director of Education Pam Steinbach, RN, MS.

"You are not here merely to make a living. You are here in order to enable the world to live more amply, with greater vision, with a finer spirit of hope and achievement. You are here to enrich the world, and you impoverish yourself if you forget the errand."

— Woodrow Wilson





FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS

BACKGROUND

The Federal Trade Commission's (FTC) *mission is to prevent business practices that are anticompetitive or deceptive or unfair to consumers; to enhance informed consumer choice and public understanding of the competitive process; and to accomplish this without unduly burdening legitimate business activity.*

The Federal Trade Commission (FTC), in response to the development of additional mid-level practitioners and the possible passage of similar provisions in other states, **submitted 15 pages of written comments to CODA on the proposed dental therapy education standards.**

"FTC staff urges the ADA and CODA to avoid exercising their current authority in a way that could impede the development of this potentially valuable and innovative model of dental care delivery." - FTC Letter of Comment

**To read the full FTC
comment letter please
visit:**

<http://alturl.com/3pfct>



Office of Policy Planning
Bureau of Competition
Bureau of Economics

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

December 2, 2013

Sherin Tooks, Ed.D., M.S.
Director, Commission on Dental Accreditation
211 East Chicago Avenue, 19th Floor
Chicago, IL 60611

Dear Dr. Tooks:

The staffs of the Federal Trade Commission Office of Policy Planning, Bureau of Economics, and Bureau of Competition¹ (collectively, "FTC staff") appreciate the opportunity to comment on the *Accreditation Standards for Dental Therapy Education Programs* proposed by the Commission on Dental Accreditation ("CODA").² Dental therapists are a relatively new type of "mid-level" provider that offers some of the same basic dental services offered by dentists. Expanding the supply of dental therapists by facilitating the creation of new dental therapy training programs, therefore, is likely to increase the output of basic dental services, enhance competition, reduce costs, and expand access to dental care. This could especially be true for underserved populations. Recognizing this potential, a number of state legislatures have expressed interest in creating dental therapy educational and training programs. At least one jurisdiction, the State of Minnesota, has created new training programs and has urged CODA to develop accreditation standards that would apply to its programs. The promulgation of accreditation standards could have a significant impact on the success of such programs. It would enhance the attractiveness of such programs to prospective students because it could more easily allow dental therapists licensed in one state to obtain licensing in another state. It could also spur the development of additional training programs.

As currently worded, however, the proposed CODA accreditation standards might be interpreted in ways that could impede competition. For example, the proposed standards state that diagnosis and treatment planning are the responsibility of a supervising dentist, even though such statements ordinarily are not found in the accreditation standards of education programs for other allied dental professionals who are also supervised by dentists. Such statements could have two interrelated effects. First, they may constrain states' discretion to select the level of supervision that they determine is appropriate for different types of dental training programs that they may create, and to define broadly dental therapists' scope of practice to include oral evaluation and treatment planning. Accordingly, we are concerned that such statements may hamper efforts to promote the use of dental therapists to enhance competition and expand access to dental services, especially in underserved areas where dentists are scarce or unavailable. Second, such statements may deter the development of dental education programs that would



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"The standards' effectiveness may be limited, however, by unnecessary statements on supervision, evaluation, and treatment planning. We respectfully suggest that CODA consider dropping such statements."

- FTC Letter of Comment



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FTC made several recommendations to CODA including the development of standards that do not effectively and unnecessarily constrain the discretion of states to determine dental therapy scope of practice and authority.

- CODA should not take the unusual step of including supervision and scope of practice limitations in an education program accreditation standard.¹
- Additionally, FTC recommends CODA to consider omitting categorical statements regarding a supervising dentist's responsibility for diagnosis and treatment planning.²
- Furthermore CODA should consider developing accreditation standards for master's or graduate level programs that train dental therapists to conduct oral evaluations and develop treatment plans without requirements for an on-site supervising dentist.



- **January 30, 2014 CODA Open Session:** CODA modified the proposed standards for dental therapy education programs and directed that the newly modified standards be circulated again for comment to the communities of interest until December 1, 2014.
- Open hearings will be conducted at:
 - ADEA Annual Session
 - ADHA Annual Session
 - ADAA Annual Session
 - ADA Annual Session

CODA Releases Revised Draft Dental Therapy Standards

NOTABLE CHANGES

- **Supervision**

- The FTC echoed ADHA’s concern regarding supervision. The FTC suggested that CODA should consider omitting categorical statements regarding a supervising dentist's responsibility for diagnosis and treatment planning, topics that are typically addressed by the individual states in their licensure and scope of practice laws.
- **Revision:** ADHA is supportive of CODA’s decision to remove the onerous and **restrictive supervision** requirements which would have in effect prohibited direct access for this new provider.

CODA Releases Revised Draft Dental Therapy Standards

NOTABLE CHANGES

- **Baccalaureate Requirement**
 - The curriculum for dental therapy programs, as modified, will support the overall education, training, and assessment to a level of competency within the scope of dental therapy practice.
 - **Revision:** ADHA supports CODA's changes to the criteria for the curriculum which removes the restrictive language specifying terminal degree requirement.

CODA Releases Revised Draft Dental Therapy Standards

NOTABLE CHANGES

- **Advanced Standing**

- The advance standing will serve as an opportunity for programs to provide for the educational mobility of students through articulation arrangements allowing for greater career opportunities.
- **Revision:** ADHA supports CODA's inclusion of a curriculum that results in **advanced standing** for dental hygienists.

CODA Releases Revised Draft Dental Therapy Standards

NOTABLE CHANGES

•Educational Program Director

- ADHA advocated for removal of the provision mandating that a dentist must be the dental therapy program director.
- **Revision:** The program director **must** be a licensed dentist (DDS/DMD), or either **a licensed dental hygienist** or **licensed dental therapist** possessing a master's or higher degree.



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