

December 2, 2024

Ohio State Dental Board
77 High Street, 17th Floor
Columbus, OH 43215

Re: Opposition to Proposed Revisions to Specialty Advertising Laws (OAC-4715-5-04)

Dear Members of the Ohio State Dental Board:

On behalf of the undersigned dental organizations representing thousands of dental specialists in Ohio, **we strongly oppose the Ohio State Dental Board’s proposed revisions to Ohio Administrative Code 4715-5-04.** These changes pose significant risks to patient safety, threaten the integrity of dental specialty practice, and lack transparency in their development process. Despite their far-reaching impact on providers and patients, we are concerned that these revisions were drafted without consultation from Ohio’s dental and dental specialty organizations, whose missions include promoting optimal oral health by upholding the highest standards of patient care.

Our principal concern is the grave risk these revisions pose to patient safety, directly contradicting the Board’s mission to “protect the oral health of Ohioans and promote access to care.” Dentists are trusted healthcare leaders in their communities, and patients depend on accurate, transparent information about their providers’ training, education, and qualifications to make informed healthcare decisions. The proposed changes undermine this trust, fostering misinformation and potentially jeopardizing patient outcomes.

Oral health literacy remains a significant challenge for many Ohioans, who often struggle to differentiate between dental providers – these proposed revisions exacerbate that problem. A 2020 survey revealed that 73% of Ohio residents would assume a dentist advertising as a specialist had completed an accredited residency program. Notably, 70% of patient respondents indicated they would be less likely to seek specialty care if they learned the dentist had yet to complete such training.¹ Current specialty truth-in-advertising laws protect patients by ensuring clarity and preventing misleading claims about providers’ education and qualifications. The proposed amendments, however, would dismantle these safeguards, exposing patients to greater confusion and harm.

We oppose the provisions that eliminate the requirement for dentists to complete a Commission on Dental Accreditation (CODA) postdoctoral program before advertising as specialists and reject lifting restrictions that limit specialty advertising to only those designations recognized by the ADA’s National Commission on Recognition of Dental Specialties and Certifying Boards. Additionally, the new provision that allows dentists to advertise as a specialist—based solely on affiliation with a self-designated certifying board—opens the door to unregulated, inadequately trained practitioners.

The ADA’s National Commission on Recognition of Dental Specialties and Certifying Boards protects the public and the profession through a rigorous and objective review process for dental specialties and specialty certifying

¹ Fields HW, Casamassimo P, Owsiany DJ, Saperstein M. The case for tying specialty status to completion of dental residency: Dental education’s stake. *J Dent Educ.* 2020; 84:852–856. <https://doi.org/10.1002/jdd.12139>

boards, based on the *Requirements for Recognition of Dental Specialties and National Certifying Boards for Dental Specialists.*” These requirements ensure that each individual specialty is well defined in scope, that it requires advanced knowledge, skills and training that differentiates it from other recognized specialties, and that it has a direct benefit to clinical patient care and meet the needs of the patient population, among others. Recognized specialties and boards undergo regular reviews to prove continued adherence to these standards. Allowing any “organization” to recognize specialties or specialists would lack this scrutiny and fail to uphold standards.

This deregulation risks the rise of uncertified boards or organizations granting “specialist” status through insufficient virtual or weekend courses in Ohio. Such programs lack the rigorous hands-on training and experience required for safe, competent specialty care that is already in place in the state. Currently, the Commission on Dental Accreditation is the sole agency recognized by the Department of Education for accreditation of dental and advanced dental education programs. By removing this specialty education training requirement, the Board jeopardizes patient safety and invites malpractice, undermining the very standards it is charged with upholding.

The Ohio State Dental Board has a duty to protect patients and ensure the provision of high-quality dental care across the state by dental professionals. **For these aforementioned reasons, we urge the Board to withdraw the proposed revisions to OAC 4715-5-04 and preserve Ohio’s existing specialty advertising requirements.** These protections are essential for preventing medical misinformation, safeguarding patient trust, and supporting positive health outcomes. Our organizations would welcome the opportunity to speak with you further about our concerns and the severe consequences this would have on Ohio dental specialists. Please contact Darcy McLaughlin at (312) 872-0462 or DMcLaughlin@aae.org to facilitate further discussion.

Sincerely,

American Academy of Oral and Maxillofacial Pathology
American Academy of Pediatric Dentistry
American Academy of Periodontology
American Association of Endodontists
American Association of Oral and Maxillofacial Surgeons
American Association of Orthodontists
American College of Prosthodontists
American Society of Dentist Anesthesiologists