

December 2, 2024

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

Re: AAE and OAE Opposition to Proposed Revisions to Specialty Advertising Laws

Dear Members of the Ohio State Dental Board:

On behalf of the American Association of Endodontists (AAE) and the Ohio State Association of Endodontists (OAE), we are writing in **strong opposition** to the Ohio State Dental Board's proposed revisions to Ohio Administrative Code 4715-5-04. As the leading associations representing endodontists in Ohio, we collectively advocate for the interests of over 175 members statewide. Endodontists are dental specialists with distinctive expertise in diagnosing and managing dental pain. Our specialty extends to preserving patients' natural teeth through root canal therapy and related surgical procedures, thereby contributing to the overall well-being and oral health of individuals under our care.

We are deeply troubled by the Ohio State Dental Board's lack of transparency with key stakeholders, including our organizations and patients, during the drafting process of these proposed revisions. These changes jeopardize patient safety, erode public trust in dental professionals, and contradict the Board's mission to "protect the oral health of Ohioans and promote access to care." Patients deserve clear and accurate information about their providers' qualifications to make informed healthcare decisions. Weakening these protections risks both their safety and the credibility of quality dental care in Ohio.

Our primary concern lies in the removal of existing safeguards that ensure transparency and accuracy in dental specialty advertising. A 2020 survey revealed that 73% of Ohio residents surveyed assume a dentist advertising as a specialist has completed an accredited residency program. Furthermore, 70% of respondents indicated they would be less likely to seek specialty care if they learned the dentist had not completed such training.¹ These findings highlight the importance of preserving clear and truthful advertising standards to maintain public confidence and improve oral health literacy—a significant challenge in Ohio. Unfortunately, the proposed revisions would exacerbate confusion about providers' training and qualifications, worsening the state's oral health literacy crisis.

The AAE and OAE oppose the elimination of the existing requirement for dentists to complete a Commission on Dental Accreditation (CODA) postdoctoral program before advertising as specialists and we reject the removal of 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

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>

with a self-designated certifying board or organization—opens the door to unregulated, inadequately trained practitioners. The ADA's National Commission on Recognition of Dental Specialties and Certifying Boards has established rigorous and objective standards for specialty designations, which are crucial for safeguarding both patients and the integrity of our profession. Allowing unregulated organizations or boards to grant "specialist" status risks the emergence of superficial credentials derived from weekend or virtual courses, which do not meet the necessary standards for safe and effective specialty care. Ohioans deserve better.

The Board must fulfill its responsibility to protect the public by preserving Ohio's current specialty advertising requirements. Deregulating these standards jeopardizes patient safety, invites malpractice, and diminishes the quality of care provided by Ohio dental professionals. For these reasons, we strongly urge the Board to withdraw the proposed revisions to OAC 4715-5-04. For more information, please contact Darcy McLaughlin, AAE's Director for Advocacy and Professional Relations, at dmclaughlin@aae.org or (312) 872-0462.

Sincerely,

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CC: The Honorable Mike DeWine
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