



AMERICA'S PEDIATRIC DENTISTS  
THE BIG AUTHORITY on little teeth®

October 4, 2017

Ms. Jill Steucker  
Executive Director, Iowa Dental Board  
400 SW 8th St., Suite D  
Des Moines, IA 50309

Submitted via e-mail to: [IDB@Iowa.gov](mailto:IDB@Iowa.gov)

Dear Ms. Steucker:

This letter is in response to the request for comments regarding the proposal to amend sub-rule 650—26.4 is jointly submitted by the Iowa Academy of Pediatric Dentistry (IAPD) and the American Academy of Pediatric Dentistry (AAPD). IAPD is the state organization which represents the dental specialty of pediatric dentistry and is the state chapter of the AAPD. The AAPD is the leading national advocate dedicated exclusively to children's oral health and representing the specialty of pediatric dentistry.<sup>1</sup>

Pediatric dentists are the pediatricians of dentistry. The specialty of pediatric dentistry is an age-defined specialty that provides both primary and comprehensive preventive and therapeutic oral health care for infants and children through adolescence, including those with special health care needs. This includes but is not limited to: the management of the growth and development of the jaws and teeth of children; counselling and primary dental care; dental disease management and treatment; comprehensive advanced behavior management techniques including proper administering of local anesthesia, inhalation sedation and proper in office sedation or hospital dentistry. These are just a few of the specialty techniques that are taught in our specialty residency training programs.

In order to become a specialist in pediatric dentistry, an additional two to three years of advanced residency training is required following graduation from dental school. As a result of this additional training, pediatric dentists are uniquely qualified to be the

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<sup>1</sup> The American Academy of Pediatric Dentistry (AAPD) is the recognized authority on children's oral health. As advocates for children's oral health, the AAPD promotes evidence-based policies and clinical guidelines; educates and informs policymakers, parents and guardians, and other health care professionals; fosters research; and provides continuing professional education for pediatric dentists and general dentists who treat children. Founded in 1947, the AAPD is a not-for-profit professional membership association representing the specialty of pediatric dentistry. Its 10,000 members provide primary care and comprehensive dental specialty treatments for infants, children, adolescents and individuals with special health care needs.

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primary and specialty oral care providers for infants and children through adolescence, including those with special health needs. Pediatric dentists are also eligible to become board certified and Diplomates of the American Board of Pediatric Dentistry (the specialty certifying board of Pediatric Dentistry). This requires a pediatric dentist to have credentials verified while successfully completing voluntary examinations and re-certification. Currently 75 percent of all pediatric dentists in the U.S. are board certified.

Proper techniques are important as they aid in achieving positive dental outcomes and experiences for a child. We believe the establishment of trust and a positive attitude towards dental health and their future dental well-being and care is important. Pediatric dentistry *Best Practices* and *Clinical Guidelines* have been established and are constantly reviewed and updated by the AAPD so that the practice of pediatric dentistry is effective, safe, and evidence-based.

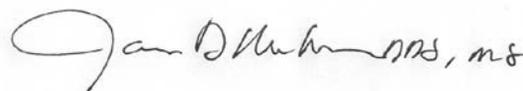
Therefore, we believe that the children and families of Iowa deserve to know whether a pediatric dentist specialist is their dental provider, and this should be clearly distinguishable in advertisements from services provided by a general dentist. It is in the very best interest and safety for the public to continue to acknowledge the ADA recognized specialty of pediatric dentistry. It is critical for the State of Iowa Dental Board to continue to protect the public from any misinformation and confusing advertising. This is especially important because pediatric dentistry is the only age-defined dental specialty. Because of this fact, we believe it is inappropriate and unethical for a non-pediatric dentist to advertise with terms such as “Children’s Dentistry” or “General Dentistry practice limited to *pediatric dentistry*” or “General Dentistry with emphasis on *pediatric dentistry*.” Trust is essential to the provider and patient relationship. It is imperative to aid the public in discerning the difference between general dentists who provide dental services for children versus a pediatric dentist. Ethical regulations for advertising the specialty of pediatric dentistry should also include social media, as well as print advertising.

We would be pleased to respond to any questions or comments from the Iowa Dental Board concerning these comments. Thank you for this opportunity to voice our opinions on this matter.

Sincerely,



Dr. Michael Stuffelbeam  
President  
Iowa Academy of Pediatric Dentistry



Dr. James D. Nickman  
President  
American Academy of Pediatric Dentistry