

Mr. Irwin Fefergrad  
Royal College of Dental Surgeons of Ontario  
6 Crescent Road  
Toronto, ON M4W 1T1

June 24, 2016

Dear Mr. Fefergrad,

Thank you for your email of June 7, 2016 regarding The Royal College of Dentists of Canada's (RCDC) 2015-2018 Strategic Plan. We appreciate your considered input.

RCDC's strategic plan is our organizational map for the future and communicates, internally, and to our stakeholders, our strategic goals and the actions needed to achieve those goals. It is intended to guide our leadership's decision-making and actions towards our strategic directions.

RCDC's strategic plan does not specifically reference the Royal College of Dental Surgeons of Ontario (RCDSO), other Canadian dental regulators (DRA) or the Canadian Dental Regulatory Authorities Federation (CDRAF). However, the lack of reference to the RCDSO, the DRAs, or the CDRAF should not in any way be misconstrued as RCDC having no regard for our role as a third-party dental specialty examination provider.

To the contrary, RCDC has always been, and will continue to be, very sensitive to, and considerate of, the needs and requirements of all of the Canadian DRAs, including the RCDSO. This was especially evident during the development of the plan, and thereafter as our work product has been advanced. RCDC is particularly cognizant of its role as a third-party provider of high-quality and reliable examination instruments used by the DRAs. RCDC's strategic plan was circulated to our stakeholders as a matter of courtesy and respect, and to demonstrate our continued commitment to transparency, impartiality, objectivity and fairness.

Through one initiative resulting from our strategic planning, RCDC has reviewed and revised its organizational and committee structure. This provides for a greater involvement of the DRAs. Included below are two charts, i.e.: Chart 1: Former Committee Structure (page 2); and Chart 2: Current Organizational Structure (page 3). We are confident that you will find the changes to RCDC's committee structure to be highly satisfactory and a significant improvement to regulatory body representation and participation within the educational arm of our core business.

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**Chart 1: Former Committee Structure**

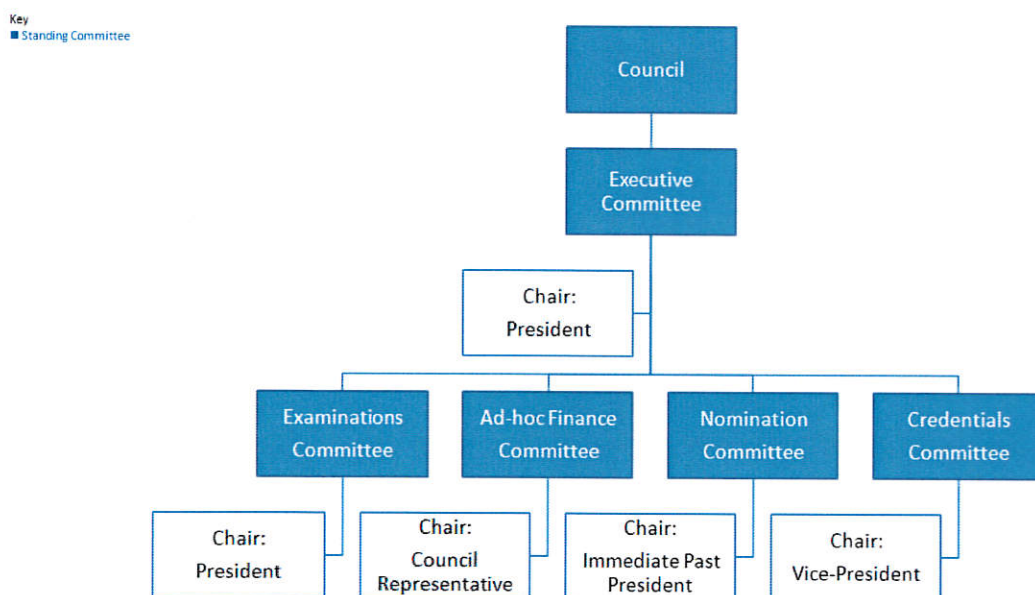


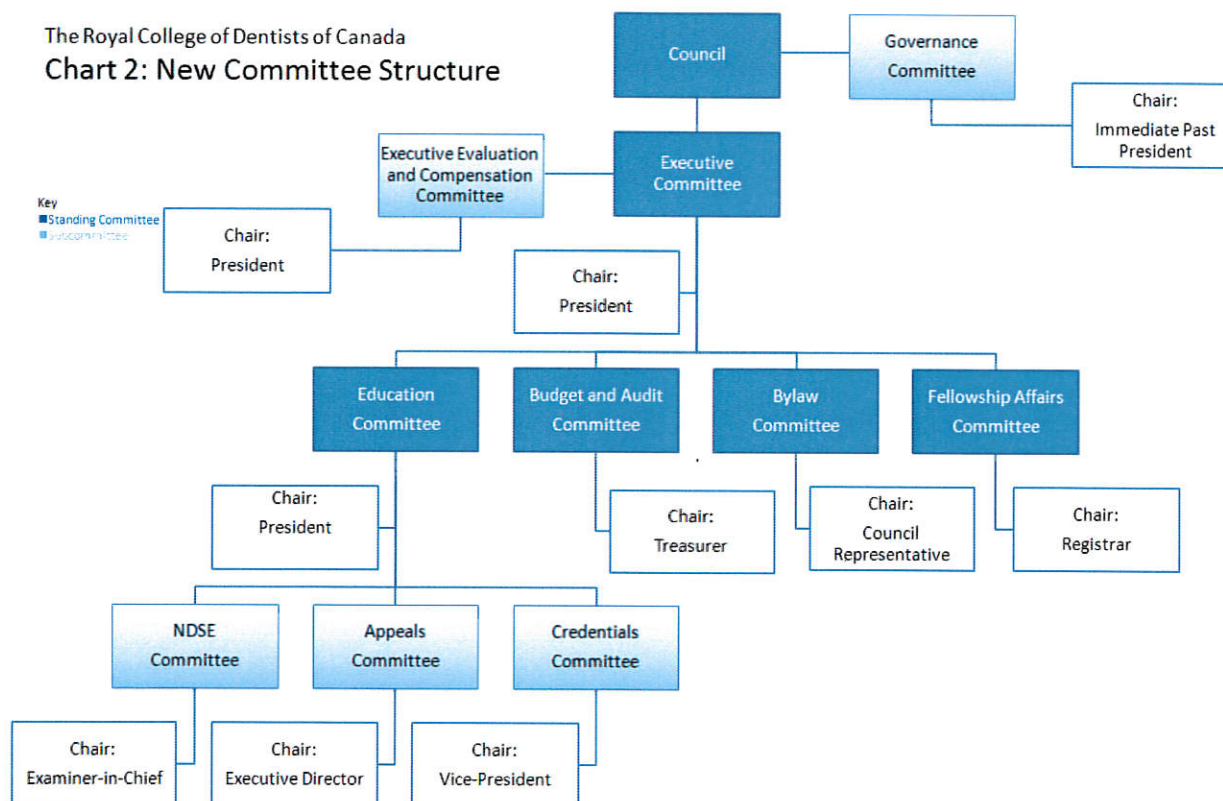
Chart 1 illustrates RCDC's former committee structure and notes the respective committee chairs.

As you will recall, in 2012, at the request of CDRAF, RCDC added two (2) CDRAF representatives to the Examinations Committee. RCDC has valued the addition of these stakeholders at the Examinations Committee, so when the committee structure was being reconsidered to improve regulatory oversight, RCDC sought ways to build upon this success.

Chart 2 (page 3) illustrates RCDC's new committee structure and notes the respective committee chairs. Changing the education arm of our business has allowed RCDC to be more transparent (internally and externally), improves oversight of the National Dental Specialty Examination, which relies so heavily on volunteer (membership) involvement, and at the same time improves the flow of communication organizationally, both up and down.

You will note that replacing the former Examinations Committee is a new Education Committee, which oversees three (3) sub-committees, i.e.: National Dental Specialty Examination (NDSE) Committee, Appeals Committee and Credentials Committee. The Education Committee will ensure that Council fulfills its legal, ethical and functional responsibilities through oversight of the National Dental Specialty Examinations in order to maintain or enhance the organization's high standards through examination standard setting, policy development, and evaluation of the NDSE, Appeals and Credentials Committees and their members' performance.

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**Chart 2: New Committee Structure**



To ensure that the Education Committee can full this mandate, the membership of the committee has been expanded to include the following:

Voting Members

President (Chair)	2 years
NDSE Committee Chair (EIC)	3 years, renewable once
Appeals Committee Chair (ED)	-
Credentials Committee Chair (VP)	2 years
CDSBC Member	2 years, renewable once
ADAC Member	2 years, renewable once
CDSS Member	2 years, renewable once
MDA Member	2 years, renewable once
RCDSO Member	2 years, renewable once
ODQ Member	2 years, renewable once
NBDS Member	2 years, renewable once
PDBNS Member	2 years, renewable once
DCPEI Member	2 years, renewable once
NLDB Member	2 years, renewable once
Dental Sciences Chief Examiner	3 years, renewable once
DPH Chief Examiner	3 years, renewable once
ENDO Chief Examiner	3 years, renewable once
OMS Chief Examiner	3 years, renewable once



OMOP Chief Examiner	3 years, renewable once
PERIO Chief Examiner	3 years, renewable once
PEDO Chief Examiner	3 years, renewable once
PROS Chief Examiner	3 years, renewable once
ORTHO Chief Examiner	3 years, renewable once
OMR Chief Examiner	3 years, renewable once

<u>Non-voting Members</u>	Director, Examinations	-
	Psychometrician	-
	ACFD Member	2 years, renewable once
	CDAC Member	2 years, renewable once
	CDSA Member	2 years, renewable once

You will note that there are no CDRAF Representatives included in the committee membership. As the expanded membership provides a voting membership position for every DRA, it was viewed as redundant to also include CDRAF representation. Moreover, with each of the DRAs represented, RCDC will have a more comprehensive understanding of the nuances of the regulatory issues in all jurisdictions, allowing for far greater regulatory oversight.

As mentioned, the Education Committee, with DRA and stakeholder inclusion, will oversee the NDSE, Appeals and Credentials Committees and their members' performance. For your reference, please see enclosed the Education, NDSE, Appeals and Credentials Committees Terms of Reference.

While no reference is made within the strategic plan to accountability and/or reporting to the DRAs, RCDC, although an autonomous and independent organization, is committed to ensuring that the DRAs are aware of, and have a voice in, the National Dental Specialty Examinations upon which they rely. To that end the new Education Committee has one (1) voting member from each of the Canadian DRAs, and one (1) non-voting member from ACFD, CDAC and CDSA. Each member, whether voting or not, will receive complete agenda packages as well as minutes from previous meetings. In addition, the Education Committee will receive complete agenda packages, including minutes, from each of the sub-committees which serve under and report to the Education Committee, namely: NDSE, Appeals and Credentials Committees.

In addition to RCDC's publically published Annual Report, the information which will now be provided to each Canadian DRA far surpasses that which has been previously available. Again, I am certain you will agree that this is a significant step forward in demonstrating RCDC's continued commitment to transparency, impartiality, objectivity and fairness.

As you are well aware, it is the mandate and responsibility of each DRA to ensure the public's interest and safety. While RCDC's strategic plan may not reference the public's interest, as a third-party, RCDC is involved directly and tangibly in ensuring the public interest and safety through our mandate to provide high-quality, psychometrically valid examination instruments that ensure successful candidates meet or exceed the nationally recognized standards of entry-level competency within their chosen specialty.

For the past 7 years RCDC has included a public member on Council. However, within the new organizational structure, and in addition to a public member on Council, we will have a public member(s) on the following committees:

- Budget and Audit Committee – includes three (3) public members with expertise in the following fields: legal, audit and investment
- Governance Committee – includes one (1) public member

For reference, please see enclosed the Budget and Audit, and Governance Committees Terms of Reference.

RCDC's vision to be the recognized leader in the definition and development of dental specialty competencies through education, evaluation, certification and recertification is our goal for what RCDC will be 5 to 10 years. This vision will be driven internally, but will require collaboration as we proceed. We look forward to working with our stakeholders, especially the DRAs, as we move toward achieving this vision.

RCDC's strategic plan does not incorporate or mention fairness legislation. As a third-party provider we do not have a direct link to any Fairness Commission. In the past, RCDC has reached out to various Fairness Commissioners to request a direct meeting and have been refused, as we do not report to any Fairness Commission directly. However, RCDC is always prepared to discuss Fairness Commission concerns with any of our dental regulatory authority stakeholders when, or as, required. Furthermore, we look to you, the individual provinces with Fairness Commissions, to keep RCDC informed of ways we can continue to improve our examinations and processes to meet the standards required and expected of Fairness Commissions. In fact, we have never refused an opportunity to discuss our core business when requested and seek improvements when identified by any of the DRAs.

RCDC is a membership-based organization and has been since its inception in 1965. As such RCDC has a two-fold mandate: (1) to provide valid and reliable evaluation of dental specialists in Canada; and (2) to ensure the development, satisfaction and retention of our membership.

Your email infers the concerns of our members as being irrelevant or inappropriate. However, RCDC's strategic focus on member satisfaction is necessary and essential to ensure that RCDC retains a pool of invested members who are willing to provide volunteer effort and expertise in the provision of the NDSE. Without a continued, strong and dedicated membership, RCDC cannot continue to deliver the high quality examination instruments that the RCDSO, and all other regulators, rely upon for registration/licensure. RCDC competently delivers the NDSE in two components for nine specialties in both official languages. Presently, these are developed, delivered, improved and defended at no cost to the DRAs, who are the prime consumers of that highly valuable, RCDC member derived, work product. Given RCDC's extremely small annual budget, we cannot afford to pay experts for content creation and examination delivery. Consequently, RCDC will continue to respect and prioritize the needs of its members and will not trivialize their contribution to the Canadian public interest and safety.

RCDC constantly strives to establish and maintain collaborative, constructive, mutually respectful relationships with all of our members and stakeholders. We are committed to fostering relationships of that nature. We trust and expect that our stakeholders will be equally committed to these principles in their engagements with RCDC.



We trust that you will be impressed at how considerate and thorough RCDC has been in ensuring the continued need for the involvement of the DRAs and various stakeholders, and the need to ensure transparency, impartiality, objectivity and fairness in our mandate to provide high-quality, high-stakes evaluation instruments.

Sincerely,



Peter McCutcheon  
*Executive Director*

cc: Ms. Susanne Sutton, Canadian Dental Association  
Dr. Brian Rinehart, Canadian Dental Regulatory Authorities Federation  
Ms. Diane Legault, Canadian Dental Regulatory Authorities Federation  
Mr. Frederic Duguay, Commission on Dental Accreditation of Canada  
Dr. Jack Gerrow, National Dental Examining Board of Canada  
Dr. Paul Allison, The Association of Canadian Faculties of Dentistry  
Dr. Ernest Lam, Canadian Dental Specialties Association  
Dr. Gordon Thompson, Alberta Dental Association and College  
Mr. Jerome Marburg, College of Dental Surgeons of British Columbia  
Dr. Bernie White, College of Dental Surgeons of Saskatchewan  
Dr. Ray D. Wenn, Dental Association of Prince Edward Island  
Dr. Paul O'Brien, Newfoundland and Labrador Dental Board  
Dr. Marcel Van Woensel, Manitoba Dental Association  
Mr. Dan Leger, New Brunswick Dental Society  
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