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October 2nd, 2018

Dr. J. Gerrow
Executive Director
Canadian Dental Regulatory Authorities Federation
6 Crescent Road, 3rd Floor
Toronto, ON, M4W 1T1

Dear Dr. Gerrow,

Subject: Academic/restricted licensing across Canada

I write to you concerning the issue of “academic/restricted licenses” that I brought up in attending the CDRAF meeting in Montreal in February.

Firstly, I would like to thank CDRAF for inviting me/ACFD to the meeting in February to bring this subject forward. Secondly, I would like to thank CDRAF for being open to engaging in a discussion concerning this complex and important issue. As requested at the meeting in February, I am outlining for CDRAF a) the nature of the problem facing dental schools across Canada; and b) potential solutions.

Before responding to those two points, it is important to be clear on what we mean by “academic/restricted license” and to understand the context in which this issue is being raised by ACFD, because it is directly related to the problem and the need to find a solution. For ACFD “academic/restricted licensing” is defined as licenses to practice dentistry provided by Canadian dental regulatory authorities (DRAs) to individuals who have obtained their training as a general and/or specialist dentist in non-accredited programs, so they can perform clinical dental acts only in settings in or affiliated with Canadian dental schools. Individuals with these “academic/restricted licenses” perform clinical dental acts in the context of supervising dental trainees (undergraduate dental students, general practice residents or specialist trainees), clinical research and/or providing dental treatment directly to patients so as to maintain their clinical skills.

The context is that dental schools in Canada, USA and elsewhere in the world are finding it increasingly difficult to hire academic dental staff. Why is this happening? Here are a few reasons (see <https://www.adea.org/snapshot/> for relevant background information concerning US dental graduates. We do not have the same data in Canada but many of the trends are likely to be similar):

- Dental students are graduating with high levels of debt;
- For significant academic roles in dental schools, we require candidates to have graduate training in a specialty field and/or in research, thereby increasing debt further;
- The level of compensation a dental school can provide an early career professor is significantly less than the compensation they can potentially earn in a private office;
- The prestige of working as a professor in a dental school/top university is no longer as strong as it used to be;
- Because of their needs, schools often advertise for specific positions with specific expertise and experience required, thereby reducing the field of potential applicants;



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- Universities and dental schools insist on hiring top professors for given roles wherever in the world they come from. Universities across Canada, particularly those with dental schools, which are all research-intensive universities, are full of professors from across the globe and the university will expect its dental school to hire the best possible person among applicants. While many such potential dental professors may have been trained in an accredited program, it is increasingly likely to be a dentist trained in a non-accredited program. And this trend will keep increasing.

Given this context, Canadian dental schools often find themselves identifying an individual with excellent training and expertise to fulfill their needs but who has training from a non-accredited program. The school may then approach the local DRA to discuss the possibility of obtaining an “academic/restricted license”. The context of the request for an “academic/restricted license” often varies according to the role the dental professor needs to fulfill. Their main role may be research and teaching, so clinical care is a minor part of their work, or their main role may be clinical teaching and supervision, in which case clinical care is a significant element of their role. Dental professors with the former role are often reluctant to engage in costly, intensive processes to obtain a “standard” license that they will personally benefit from little. These individuals will often require “academic/restricted licenses” on a semi-permanent basis. Dental professors whose main role is clinical teaching and supervision, on the other hand, will more likely want to obtain a standard license and be willing to undergo the necessary processes, so their “academic/restricted license” is likely to be temporary, while they obtain the standard one.

When the school approaches the local DRA, the following problems may arise for the dental school and DRA:

- The approaches to “academic/restricted licensing” vary considerably across DRA’s from no such license being provided under any circumstances to a broad range of licenses being provided according to the need of the school/individual dentist;
- With some DRA’s the approach is ad hoc, and new solutions and limits/restrictions to the license are created with each new case;
- With some DRA’s supervision of the “academic/restricted” licensee is required and with others not. Beyond that, the definition of supervision is not clear e.g. direct or indirect;
- If the school is not able to agree with the DRA the provision of an “academic/restricted license”, the school will either have to not hire that individual and start the search process again (a significant resource-consuming process) or hire them with a modified and limited role.

The above is the nature of the problem.

ACFD’s suggestion for a solution is as follows. For reasons of fairness towards individual dentists in this situation, towards patients, schools and DRAs, ACFD recognizes the need for a standard approach. We also recognize that DRAs’ definition of a “restricted license” should probably apply beyond the academic setting. However, it may be possible to have some form of standard “academic” license that applies only to certain academic settings and circumstances and could be withdrawn should the individual concerned no longer work at a school. We feel strongly the need to reiterate that, in order to maintain excellent training of dentists at all levels at Canadian dental schools, Canadian dental schools need to be able to hire excellent professors from across the world, including those trained in non-accredited programs. We



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therefore suggest setting up a joint working group to address this topic, in particular looking into and providing recommendations concerning the following issues:

- a standard definition for “restricted licenses” across DRAs;
- can we have “academic licences” as a special case of restricted licenses?;
- a standard approach to providing “restricted/academic licenses” across DRAs;
- reviewing the need for supervision of a “restricted/educational” licensee by an appropriately trained, fully licensed dentist/specialist;
- given that the best way to assess competence is prolonged observation by an evaluator of a potential licensee, could an “academic/restricted” license in an dental school be a means to facilitate assessment of competency leading to “unrestricted” licensure?

We hope this letter helps clarify the situation Canadian dental schools find themselves in and that our suggested solutions are helpful. We are committed continuing a discussion over this important issue and look forward to engaging in that discussion with CDRAF and member DRAs over the coming months.

Yours sincerely,

Paul Allison