



THE STATE  
of **ALASKA**  
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### **Notice of Proposed Changes Relating to Licensure Requirements and Training for Moderate or Minimal Sedation Permits in the Regulations of the Dental Board**

#### **Proposed Regulations - FAQ**

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*December 2018*

#### **Training Requirements for Moderation Sedation and Minimal Sedation of patients younger than 13 years of age.**

##### **12 AAC 28.010 and 12 AAC 28.015- Updates**

##### **1. What are the new regulations being proposed?**

The proposed change to the regulations will clarify the number of anesthesia cases required for a sedation permit. The changes will also update the sedations needed to obtain a moderate permit by requiring the sedations to be under direct supervision of a permitted dentist or CRNA. In addition, due to no availability of a 60 hour continuing education course for pediatric sedation only, the Board will be removing the continuing education course as an avenue to obtain the moderate sedation permit for licensees wishing to provide moderate or minimal sedation *only* to patients younger than 13 years of age.

##### **2. What will this new regulation do?**

The removal of the continuing education course for obtaining a moderate sedation permit to sedate patients younger than 13 years of age only, either moderate or minimal sedation, will mean an applicant must complete a pediatric residency to qualify for the permit.

If a moderate sedation permit holder wishes to sedate patients younger than 13 years of age in addition to sedating patients 13 years of age and older, the permittee must complete a minimum of 30 hours of continuing education that meets the requirements set out in the new section 12 AAC 28.027, as noted below, and provide proof of administration of sedation for an additional 20 individually managed patients younger than 13 years of age. The regulation also clarifies that the 20 sedations must be completed under the supervision of a sedation provider holding a current moderate or deep sedation permit in good standing for patients under 13 years of age, or a certified registered nurse anesthetist, in this state or another jurisdiction.

##### **3. Why are the new regulations needed?**

Sedating children is not the same as sedating small adults. It is the Board's opinion that extra training focusing on the sedation of children should be required to supplement the training licensees receive during an adult

moderate sedation curriculum if the dentist desires to sedate patients younger than 13 years of age (pediatric patients). As of now, there are no stand-alone continuing education courses available that provide the minimum 60 hours of training in pediatric sedation along with required over site by qualified faculty that would be necessary to offer a moderate sedation permit for the under 13 years of age group only under 12 AAC 28.015(f)(2). Therefore, the pathway should be eliminated. Furthermore, the Board believes that differences in sedating younger children when compared to adults warrant the need to include a supervisory component to the individually managed sedation cases required under 12 AAC 28.015(e)(2)(B) and 12 AAC 28.015(j)(2).

#### **4. What are the positive and negative consequences of the new regulations?**

By strengthening the requirements for sedating patients younger than 13 years of age (pediatric patients), the public will be served by more highly trained sedation providers, and the ability to over sedate a pediatric patient and possibility of an emergency will be minimized.

The negative consequences of the new regulations may be the cost for a sedation provider to obtain the required training for sedating pediatric patients. This may keep some providers from desiring to sedate pediatric patients.

The Board believes when it comes to sedation safety, extra or more rigorous training always outweighs a possible decrease in access to care. Also, the number of pediatric residency graduates in Alaska has increased significantly over the last several years allowing the public greater access to providers specifically trained to sedate and provide dental care to pediatric patients.

### **12 AAC 28.025-027- Training Requirements for Moderate Sedation Permits.**

#### **1. What are the new regulations being proposed?**

- 12 AAC 28.025- Is proposed by adding a new section for Board approval of training courses for moderate sedation for patients of all ages, or minimal sedation of patients younger than 13 years of age. This section outlines what documentation will be required to be submitted before the Board will consider the course for approval.
- 12 AAC 28.026- Is proposed by adding a new section for the requirements of a training course for moderate sedation of patients 13 years of age and older. This section clearly defines what the training course must consist of, including documentation of competence, and if the training is through a continuing education course, the course must be certified by the American Dental Association (ADA) Continuing Education Recognition Program (CERP), or the Academy of General Dentistry (AGD) Program Approval for Continuing Education (PACE).
- 12 AAC 28.027- Is proposed by adding a new section for requirements of a training course(s) for moderate or minimal sedation of a patient younger than 13 years of age if the applicant wants to sedate pediatric patients in addition to sedating patients 13 years of age or older with a moderate sedation permit. The 30 hours of continuing education coursework must be certified by the American Dental Association (ADA) Continuing Education Recognition Program (CERP), or the Academy of General Dentistry (AGD) Program Approval for Continuing Education (PACE), or offered by other organizations approved by the Board. This section will also require the sedation of

20 individually managed patients under the age of 13 to be under the supervision of a permitted sedation provider in moderate or minimal sedation or a CRNA.

## **2. Why are the new regulations being proposed?**

There has been some confusion as to what the Board considers sufficient training when it comes to the sedation of children under 13 years of age. There is a need to clearly define for applicants what the requirements are for moderate sedation courses so an applicant can be sure the course(s) they plan on taking or have taken, meets the training requirements prior to taking the course and subsequently applying for a moderate sedation permit, or adding a designation for sedating patients younger than 13 years of age to their existing moderate sedation permit. The desire to strengthen education training requirements for sedation in the dental office overall has been a goal of the Board for some time.

## **3. What positive consequences may this regulation have on public or private people, or businesses?**

The regulations will help dentists know what the specific criteria is for the training requirements for certain moderate sedation permit types. In addition, this will have a positive impact on patients as the patient or parent will be assured the dentist has been trained appropriately.

### **Additional questions-**

#### **1. Will I have an option to obtain a moderate sedation permit for the under 13 years of age group only other than graduating from a pediatric residency?**

No. The only way for general practitioners to sedate children under 13 years of age with anything other than nitrous oxide alone is to complete a pediatric residency, or add a pediatric designation to an adult moderate sedation permit.

#### **2. If I have a deep sedation or general anesthesia permit and have proof of PALS certification at renewal time in February 2019, can I receive an under 13 years of age designation on my permit?**

Yes. However, you must submit proof of the PALS certificate to the division to add it to your permit. You may not be able to add it using the online renewal process. Contact the licensing examiner for the Board of Dental Examiners on how to submit the PALS certificate.

#### **3. If I have a current moderate sedation permit, have PALS and completed 30 hours of additional training in pediatric sedation along with providing sedation to 20 individually managed patients in the under 13 years of age group without supervision, can I receive a designation that so indicates?**

Possibly, if proof of the coursework and sedation are turned in and your application is complete before the new regulation project, 12 AAC 28.027, goes into effect. After that time, sedation cases will have to be supervised and the specific topics mentioned in 12 AAC28.027 will be required.

#### **4. After March 1, 2019, can I sedate children under 13 years of age with anything other than nitrous oxide with my moderate sedation permit?**

No. After March 1, 2019, you must have a pediatric designation on your permit to do so, or have graduated from a pediatric residency and obtained a moderate sedation permit for sedating patients under the age of 13.

**5. Is it necessary to have a residency that includes moderate sedation training or a moderate sedation continuing education course be approved by the board prior to entering the residency or taking the sedation course?**

No, not always. Pediatric residencies accredited by CODA, or other post graduate residencies or continuing education courses that offer moderate sedation training consistent with current ADA guidelines and are CODA accredited, CERP, PACE or AGD certified will likely qualify. However, if you are unsure if a course or residency will qualify it is best to ask the board for an opinion prior to taking the course.

Oral conscious sedation courses that are less than the required 60 hours of didactic training no longer qualify for a moderate sedation permit.

Do you have a question that is not answered here? Please email [RegulationsAndPublicComment@alaska.gov](mailto:RegulationsAndPublicComment@alaska.gov) so it can be added.