Electronically Submitted:

May 27, 2014

Mr. Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Gainful Employment Proposed Regulation

Dear Mr. Duncan:

I write on behalf of the American Dental Education Association (ADEA) in my capacity as ADEA’s President and CEO. ADEA is the voice of dental education. Its members include all U.S. dental schools and many allied and advanced dental education programs, faculty and students. The mission of ADEA is to lead individuals and institutions of the dental education community to address contemporary issues influencing education, research and the delivery of oral health care for the health of the public. ADEA’s activities encompass a wide range of research, advocacy, faculty development, meetings and communications like the esteemed Journal of Dental Education.

ADEA appreciates the opportunity to provide comment in response to the Department of Education’s ("the Department") proposal to amend regulations to establish measures for determining whether certain postsecondary educational programs prepare students for gainful employment in a recognized occupation, as well as the conditions under which these educational programs remain eligible to receive funds under federal student aid programs. The development of these comments was informed by ADEA’s broad national constituency of higher education institutions, of which many administer allied and advanced specialty certificate programs to postdoctoral and dental and craniofacial research professionals.

ADEA believes it is incumbent upon us to reiterate the obvious, we do not believe that the gainful employment requirements were ever intended to apply to advanced specialty programs that terminate with the awarding of a certificate. With that said, it should be noted that the burden to ADEA’s membership institutions is considerable. These burdens include significant cost to the institutions and time burdens on personnel in order to comply with the gainful employment requirements.

All specialty certificate programs at ADEA’s representative institutions mandate both a strong biomedical sciences background and proficient
clinical skills in dentistry as a condition for admission to any advanced certificate program. The high caliber of prospective postdoctoral students seeking admission to advanced dentistry certificate programs cannot be overstated. All applicants hold a doctoral degree in dentistry. The intent of the proposed gainful employment rule is to regulate performance outcomes for graduates of for-profit institutions and certificate programs at non-profit and public institutions. Notably, the admission criteria for advanced dental certificate programs already require high professional and academic performance prior to matriculation: this metric is satisfied prior to admission and is only enriched upon awarding of an advanced dental certification.

Additionally, the proposed regulation does not address the small size of advanced dentistry certificate programs. Many such programs enroll single-digit pools of candidates. Candidates that transfer, delay, or ultimately choose not to pursue their advanced specialty certificate reflect as “drop outs” for the enrolling institution and significantly lower reported graduation rates for that program. Under the Department’s proposed rule, reported program completion rates are a metric tied to the awarding of federal funds. Consequently, dental schools administering advanced professional degree programs stand to lose federal funding due to the inherently small size of these highly specialized clinical programs.

Further, the proposed gainful employment regulation requires institutions awarding advanced dental certificates to certify their programs “meet applicable institutional or program-level accreditation requirements and state or federal licensure standards.” The standard practice of dentistry already mandates state licensure of those applicants who are practicing dentists. Also, the Commission on Dental Accreditation (CODA) works to maintain the highest professional and ethical standards in the nation’s dental schools and programs, employing a collaborative peer review accreditation process to evaluate the quality of over 1,300 dental education programs nationwide, including dental schools, specialty programs, clinical fellowships and allied dental training programs. Consequently, the Department’s requirement that a dental institution awarding a specialty certificate certify “applicable institutional or program-level accreditation requirements” to satisfy the proposed gainful employment provisions is duplicative and burdensome. ADEA acknowledges the benefit and utility of the proposed rule’s aforementioned provision, but respectfully requests the Department recognize its inapplicability and burden to dental schools awarding advanced professional certificates.

ADEA requests the Department to reconsider the expense, time burden, and unsuitability of applying the proposed gainful employment regulation to dental schools awarding certificates for specialized oral care.

Thank you for considering ADEA’s comments on the proposed gainful employment regulation. Should the Department have any questions, or like to discuss these comments further, please do not hesitate to contact Yvonne Knight, J.D., Senior Vice President for Advocacy and Governmental Relations, ADEA Policy Center at knighty@adea.org.

Sincerely,

Richard W. Valachovic, D.M.D., M.P.H.
ADEA President and CEO
cc:
Deans of United States Dental Schools
Directors of Advanced Dental Education Programs
Directors of Allied Dental Education Programs
ADEA Board of Directors
ADEA Legislative Advisory Committee