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President and Founder
DOCS Education

Christian Albouras

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Wisconsin Department of Safety and Professional Services
Sent by email: Christian.Albouras@wisconsin.gov

7/31/19

Dear Christian,

To date, DOCS Education has graduated 284 Wisconsin dentists from our Oral Sedation Dentistry program which prepares them to apply for the current Conscious Sedation-Enteral Permit 1 and to serve tens of thousands of Wisconsin dental patients who need oral sedation to meet their dentistry needs. These 284 Wisconsin dentists have *not* been trained for the current Wisconsin Conscious Sedation-Parenteral Permit II which governs the use of IV sedation and requires a training of 60 didactic hours and evidence of treatment of 20 live patients. It is a high bar, as it should be for those dentists who sedate intravenously.

The 2016 ADA Guidelines, however, *unlike* current Wisconsin law, does not recognize a difference between oral sedation and intravenous sedation. Though the science is precise that drugs are metabolized very differently through the digestive tract than directly into the bloodstream, the 2016 ADA Guidelines do not reflect that truth.

Instead, the 2016 Guidelines would create the same training requirement for dentists regardless of whether they sedate patients orally or through IV – and that training is 60 hours of didactic training and evidence of treatment of 20 live patients.

If Wisconsin adopts the 2016 ADA Guidelines, it would effectively eliminate the permit for those dentists – 284 of whom have graduated from DOCS exhaustive Oral Sedation Dentistry course – who wish to use oral sedation alone. In effect, adoption of the 2016 ADA Guidelines disenfranchises Wisconsin dentists who use oral sedation on their patients. These dentists will be faced with the choice of paying thousands of dollars and nearly a hundred hours to attend an IV sedation course, in addition to the cost of adding IV sedation equipment to their offices to meet office inspection requirements, or to *stop practicing oral sedation*.

The impact on Wisconsin dentists would be profoundly negative, resulting in the elimination of the Class I permit and a radical decrease in access to care for tens of thousands of Wisconsin citizens. For those Wisconsin citizens whose dentists currently have a Class I permit, they will no longer have access to conscious oral sedation or face higher procedure costs if their dentists choose to train in IV sedation. This is a change not supported by science, and that should be rejected.

If the intent of the board is to incorporate the ADA 2016 updated definitions to the regulations, other states have used the following methodologies that continue to allow access to care for their citizens and not disenfranchise the current enteral sedation permit holders:

1. Incorporate the latest definition of sedation into the regulations and keep the enteral route with the current permitting requirements. Replace the name for the permit from Conscious Sedation – Enteral Permit I to Moderate Sedation – Enteral Permit I
2. Incorporate the new guidelines, remove dosage restrictions for minimal sedation, and keep the current Enteral Permit I requirements. Replace the name for the permit from Conscious Sedation to Minimal Sedation.

The above rule amendments serve to ensure Wisconsin is in line with the current ADA practice standards, allows those dentists with Moderate Sedation-Enteral Permit I to continue their practices, and protects the health and safety of Wisconsin citizens.

Sincerely,
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PS: Also, I have included, at your request, a summary of our sedation and emergency training programs.

Sedation Training

Light Sedation: N₂O & Oral Sedative – 2-day course | 16 credit hours

Light Sedation is designed to teach the foundation of providing safe and comfortable dental care using nitrous oxide, oral sedatives, and their combination on healthy patients. The nitrous oxide protocol is for both children and adults, and the oral sedatives protocols with or without nitrous oxide is for adults. The 16 hours of education presented in this course is aligned with the ADA 2016 Guidelines for the teaching of Minimal Sedation and Nitrous Oxide. Ideal for dentists that wish to provide light sedation to their patient staying within the maximum recommended dose (MRD) of sedative medications taken for home use.

Oral Sedation Dentistry – 3-day course | 25 credit hours

Oral Sedation Dentistry teaches the safe and proven methods of administering enteral sedation to healthy adults. A thorough foundation in pharmacology of sedation medication, airway management, treatment planning and regulatory issues are covered. The critical sessions on patient assessment are taught by a Harvard Medical School instructor in an interactive session. Also, engage in airway management training, and view videos of sedation patient experiences demonstrating step-by-step protocols, monitoring, patient assessment, and drug interactions. The course curriculum meets many state regulatory requirements for permitting in minimal or moderate enteral sedation.

Oral Sedation Dentistry Recertification - 1-day course or 1/2 day with pre-course* | 7.5 credit hours

Dentistry, medicine, science, and pharmacology are continually evolving. Maintaining and growing the skills you learned in Oral Sedation Dentistry is simple with our one-day refresher course. We recommend attending this interactive case-based learning course at least once every two years. Cases presented will cover: the latest developments in oral sedation protocols and pharmacology; a review of airway management and patient assessment techniques that will help keep your patients safe: examining pharmacokinetics and pharmacodynamics to help you choose the best drug(s) and protocols for each patient; and understand methods to increase or decrease the level of sedation. This course meets most state's enteral sedation permit recertification requirements.

Master Series: Advance Sedation - 2-day course | 15 credit hours

Individuals suffering from chronic medical problems are one of the fastest-growing segments of the patient population. These patients benefit from sedation dentistry, as it is the safest and least stressful way to receive care. Participate in Advanced Sedation, presented by world-renowned doctors Anthony S. Feck and Leslie Fang, and learn to safely manage sedation appointments of ASA III+ patients with asthma, diabetes, bleeding disorders, and other medical issues in this two-day intensive didactic and hands-on program with one-on-one emergency simulations on high-fidelity human simulators. This course meets and exceeds most state's enteral sedation recertification requirements.

Pediatric Sedation Dentistry - 2-day with pre-course | 25 credit hours

Advances in sedative pharmacotherapeutics and a deeper understanding of patient selection has made pediatric sedation as taught exclusively by DOCS Education a safe and invaluable service. Reduce stress for your pediatric patients, their parents, and your entire team; treat patients in a single appointment and maximize patient comfort and practice efficiency. This course includes: Advanced Pediatric Airway Management (APAM) instruction with high-fidelity child simulators; learning protocols step-by-step for safe pediatric sedation; real-life pediatric case studies; and goes beyond the standard of care and mandated guidelines. This course meets several state's requirements for a separate pediatric enteral sedation permit and is recommended for all practitioners treating children 5 – 12 years old with sedation.

Pediatric Oral Sedation Dentistry Recertification - 1 or 2 day | 7.5 - 15 credit hours

This one or two-day recertification class completely updates and refreshes attendees on the proven DOCS Education pediatric oral sedation protocols as well as hands-on emergency preparation that you must have to keep patients safe. What we'll cover includes:

- Pediatric sedation protocols
- Protection and positioning equipment
- Monitoring and emergency preparedness
- A step-by-step approach to case selection, parent communication, drug/s selection and dosage, drug/s administration
- Guidelines that mandate monitoring, stabilization equipment, staff support, consent, record keeping, emergency preparedness and patient billing issues
- Six scenarios practiced on the high-fidelity human simulators that have direct application for pediatric dentists who sedate children in their office – APAM.

This course meets most state's pediatric enteral sedation permit recertification requirements.

IV Sedation Certification – 24-chapter Home-Study | 4 Office Hours | 4 days Clinical | 60 hours didactic | 20 live-patient experiences | 90 participation credit hours

The course is designed to provide the participant with the knowledge necessary to safely administer IV Sedation in the dental office setting. The course meets or exceeds the “Guidelines for Teaching Pain Control and Sedation to Dentists and Dental Students” (Oct. 2016) of the American Dental Association. The course will consist of a total of ninety (90) CE units as follows:

1. Sixty (60) hours of didactic instruction.
2. A clinical module, during which each dentist personally administers to at least twenty (20) live dental patients IV Sedation while providing dental care, in a one-to-one instructor-participant ratio. The clinical module also includes emergency medical training on a high-fidelity patient simulator.
3. Home-Study - Four modules with six chapters in each module including three hours of opioid training and 4 hours of live faculty review (office hours).
4. Course Manual: 351 pages detailing each chapter of the home-study that follows along with each chapter.

IV Sedation Recertification - 2-day course | 15 credit hours

This course is designed for IV-certified dentists and is ideal for practitioners in need of IV Sedation permit maintenance or recertification, as well as those wishing to expand their knowledge. Increase the number of protocols in your arsenal and hone your skillset in this comprehensive, hands-on session to maximize treatment effectiveness. This course is taught by general dentists, MDs, EMTs, and dental anesthesiologists. What is covered includes: Incorporate the science of new medications; refresh safety skills using high-fidelity patient simulators in one-on-one emergency training; and review of real-life case selection and protocols.

Emergency Training

Dental Advanced Life Support -2-day course | 15 credit hours

This in-depth, concentrated program provides you the critical skills required to respond to respiratory failure, airway obstruction, cardiac problems, anaphylaxis, and more. With the use of high-tech patient simulator for training, this course is exclusively for dental teams. Due to the limited size of the group, it ensures a 100% American Heart Association pass rate. Learn to create an emergency medical plan for your office and correctly assess the patient and recognize a medical emergency. Select the correct AHA algorithm for each emergency. Build an effective, in-office code team.

Advanced Cardiac Life Support - 1-day with pre-course | 15 credit hours

Be confidently prepared to handle the most common real-life emergencies that a dental office may encounter. This unique time-saving program is designed to accelerate your learning using relevant pre-course video modules in combination with an intensive live experience of our hands-on module from professional advanced emergency experts.

This course complies with many dental boards' requirements for advanced airway training.

Advanced Cardiac Life Support Recertification - 1-day course | 7.5 credit hours

This one-day, hands-on course will update you on the latest advances in emergency preparedness. It builds on the skills and confidence required to respond to the most common dental emergencies, including respiratory failure, airway obstruction, cardiac problems, and anaphylaxis. Meets AHA ACLS recertification requirements.