The ADA is submitting the following comments on the Proposed Revision to the Essential Requirements:

Comments on the revision of 2.3 Balance, new requirement, “In cases where a consensus body member receives funding from the sponsoring ASD or other entity, that information shall be disclosed, to determine if it will impact the participant’s interest classification.”

1. The new requirement does not specify exactly what information shall be disclosed, or to whom it shall be disclosed. Is it the type of organization or the name of the organization and what type of information? Is this disclosed to the consensus body?
2. Would the conflict of interest disclosure that is read and replied to at the meeting suffice?
3. Would the question we have on our membership application requiring disclosure of “Consulting arrangements, financial interests or other corporate relationships” suffice?
4. Does this funding disclosure include travel reimbursement from the ASD?
5. Understanding you may not be able to anticipate all specific cases for all ASDs in the ER, we suggest a guidance document that answers general questions like these be developed.

Thanks,
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