

Commission on Dental Accreditation

Electronic Submission of Responses to Site Visits/Progress Reports

The Commission on Dental Accreditation (CODA) requires that documents submitted to the Commission for a program's permanent file be done so in a digital format. These guidelines will assist you in preparing your digitized report for electronic submission.

Preparing the Response to Site Visits and/or Progress Report:

- Every effort should be made to ensure that the document is concise and contains only the information necessary to demonstrate compliance with the Accreditation Standards.
- If sample completed forms that include fictitious Protected Health Information (PHI) or Personally Identifiable Information (PII) are included, you must mark the document "fictitious sample". Otherwise, this could be identified as a violation of CODA policy (See Privacy and Data Security reminder at the end of this document).
- If marketing brochures/documents, case studies, presentation materials, or examinations include information that could be identified as PHI or PII (e.g., patient photos) are submitted, you must note that appropriate authorization or consent from the patient/person to release the information has been obtained; otherwise, this could be identified as a violation of CODA policy. The inclusion of these types of documents is discouraged. See Privacy and Data Security reminder at the end of this document.
- Photographs, unless directly related to your submission, should not be included. Further, photographs which require a photo wizard for viewing must not be included. Photos of patients must not be included unless an appropriate authorization or consent has been obtained.
- Documents must be positioned so that they do not need to be rotated to view.
- **Web-based Information:** The Commission must retain a snapshot of the information presented at the time of the submission of the application. For this reason, the digitized report must not link to information on the Internet. To ensure the Commission retains the information as it existed at the time of submission, please insert or "embed" all web-based information into the report.

Preparing the Report(s) for Submission

File Formats: Adobe Portable Document Format (.pdf)
Microsoft Word (.doc) or (.docx)
Microsoft Excel (.xls)

- If the report was not created as one of the above formats, use the "Save As" function to save the document in one of the preferred formats.

File Size and Name(s):

- Reports must be saved or scanned as a **single document, whenever possible.** Scanned documents exceeding 50 megabytes must be split and scanned into the least number of documents with each document not to exceed 50 megabytes. (For example, a report of 100 megabytes total document size must be split into 2, 50 megabyte documents.)

- Submission of single page or single document digitized files is not acceptable, nor is it acceptable to submit numerous file folders with small documents contained within. The program must scan or electronically combine the single documents to generate and submit the least amount of documents which adhere to the file size limitation noted above.
- File names must not include symbols (such as &, /, *, #). In addition, file names must not be more than 30 characters in length.

Reports that fail to adhere to the stated guidelines will not be accepted and the program will be contacted to submit a reformatted report. In this case, the report may not be reviewed at the assigned time.

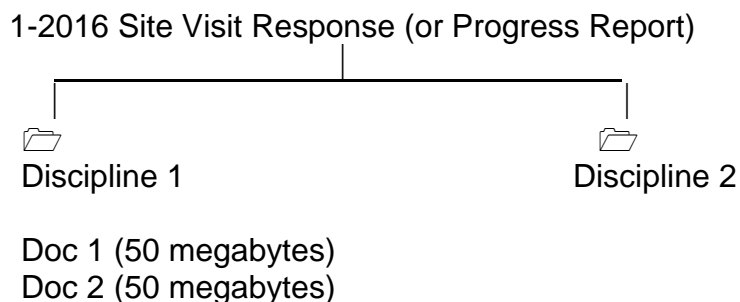
Electronic Submission of the Report

Media: Approved transmission devices include PC formatted CD-ROM or travel drive (USB drive). Sending digitized files as email attachment(s) is discouraged. Documents e-mailed to the Commission must not exceed 5 megabytes.

The use of peer-to-peer file sharing software, such as Dropbox, Kazaa, Morpheus, LimeWare, Bit Torrent, etc. is not permitted to transmit the documents to CODA.

Organization: The CD-ROM or travel drive (USB) should have one folder that is labeled “1-2016 Site Visit Response (or Progress Report).” The month and year should correspond to the actual Commission meeting date for which the report is submitted.

Within the folder, a subfolder for each discipline (program) should be created, as applicable. Inside each discipline-specific folder, the institution should present the digital report(s). ***Multiple folders within folders is not acceptable.*** The ability to rename the folder and/or documents **must not** be restricted. See below as an example.



Privacy and Data Security Reminder: The program’s documentation for CODA (self-study, application, or reports to CODA, for example) must NOT contain any sensitive personally identifiable information (“Sensitive Information” or “PII”) as outlined in “Privacy and Data Security Requirements for Institutions” (see section at the end of this document). Similarly, such documentation must not contain any identifiable patient information (“PHI”); therefore, no “patient identifiers” may be included (see section at the end of this document). This applies whether or not the program is required to comply with HIPAA.

Before sending documents to CODA, institutions must fully and appropriately redact all PII and all PHI, including all patient identifiers such that the PII/PHI and patient identifiers cannot be read or otherwise reconstructed. ***Covering information with ink is not an appropriate means of redaction.***

If the program submits documentation that does not comply with the policy on PHI and PII (noted above), CODA will assess an administrative fee of \$4,000 per program submission to the institution; a program's resubmission that continues to contain PHI or PII will be assessed an additional \$4,000 fee.

Documents that fail to adhere to the Commission's Privacy and Data Security compliance requirements will be destroyed and corrected documents must be submitted.

ASSISTANCE: Call Commission staff if you have questions about your report. Staff are available to answer questions about report preparation and can be contacted on the toll-free number: 1-800/621-8099.

- dental education programs and dental therapy programs, extension 2721;
- advanced dental education programs in dental public health, oral and maxillofacial pathology, oral and maxillofacial radiology, pediatric dentistry and prosthodontics, extension 2672;
- advanced dental education programs in endodontics, oral and maxillofacial surgery, orthodontics and dentofacial orthopedics and periodontics, and fellowships in oral and maxillofacial surgery and orthodontics and dentofacial orthopedics, extension 2714;
- advanced dental education programs in advanced education in general dentistry, general practice residency, dental anesthesiology, oral medicine and orofacial pain, extension 2788;
- dental assisting programs and dental laboratory technology programs, extension 4660; and
- dental hygiene programs, extension 2695

Commission on Dental Accreditation Discipline Abbreviations

DE – Predoctoral Dental Education
AEGD – Advanced Education in General Dentistry Education
GPR – General Practice Residency Education
Dent Anes – Dental Anesthesiology
OF Pain – Orofacial Pain
Oral Med – Oral Medicine
DA – Dental Assisting Education
DH – Dental Hygiene Education
DT – Dental Therapy Education
DLT – Dental Laboratory Technology Education
DPH – Dental Public Health Education
ENDO – Endodontics Education
OMP – Oral and Maxillofacial Pathology Education
OMR – Oral and Maxillofacial Radiology Education
OMS – Oral and Maxillofacial Surgery Education
OMS-CF COS – Oral and Maxillofacial Surgery Clinical Fellowship Education –
Cosmetics
OMS-CF CR – Oral and Maxillofacial Surgery Clinical Fellowship Education –
Craniofacial (Pediatric Craniomaxillofacial)
OMS-CF ES – Oral and Maxillofacial Surgery Clinical Fellowship Education –
Endoscopic Maxillofacial Surgery
OMS-CF MIC – Oral and Maxillofacial Surgery Clinical Fellowship Education –
Microvascular Reconstructive Surgery
OMS-CF ONC – Oral and Maxillofacial Surgery Clinical Fellowship Education -
Oncology
ORTHO – Orthodontics and Dentofacial Orthopedics Education
ORTHO-CF – Clinical Fellowship Education in Craniofacial and Special Care
Orthodontics
PED – Pediatric Dentistry Education
PERIO – Periodontics Education
PROS – Prosthodontics Education
CBMXPROS - Combined Prosthodontics/Maxillofacial Prosthetics
MXPROS - Maxillofacial Prosthetics

Commission on Dental Accreditation Privacy and Data Security Reminders

Protect sensitive personally identifiable information (“PII”) such as social security numbers, drivers’ license numbers, credit card numbers, account numbers, etc.

Security Reminder: Personally Identifiable Information

Before submitting any documents to CODA or to a CODA site visitor, an institution must:

- Review for PII and patient identifiers.
- Fully and appropriately redact any PII and patient identifiers.
- Make sure the redacted information is unreadable in hard copy and electronic form. You must use appropriate redaction methods to ensure personal information cannot be read or reconstructed.

CODA **does not accept** PII or patient identifiers in any materials submitted by a program.

Security Reminder: Patient Identifiers

Before submitting any information about a patient to CODA or to a CODA site visitor, you must **thoroughly redact all 18 patient identifiers listed on the next page.**

Examples of information about a patient:

- Dental records
- Rosters of procedures (procedure logs)
- Chart review records (chart audit records)
- Information from affiliated teaching institutions, to include items listed above
- Brochures with patient images and/or information
- Presentations with patient images and/or information
- Course materials (exams, lecture materials) with patient images and/or information

If **even one** identifier is readable, do not submit the information to CODA.

CODA does not accept documents containing PII or patient identifiers from institutions. Any PHI/PII that is necessary for CODA accreditation may only be reviewed by CODA site visitors when they are on-site at the institution.

When redacting identifiers, you must ensure that the information is unreadable and cannot be reconstructed in both hard copy and electronic form. For example, certain information redacted on a hard copy can become readable when the hard copy is scanned. Instead, it may be effective to use opaque cover-up tape on the hard copy, scan, and then ensure the redacted information on the scanned version is not visible/readable through the redaction.

Commission on Dental Accreditation

Privacy and Data Security Requirements for Institutions

(Rev. 2/22/19)

1. **Sensitive Information.** To protect the privacy of individuals and to comply with applicable law, the Commission on Dental Accreditation (“CODA” or “the Commission”) **prohibits all programs/institutions from disclosing in electronic or hard copy documents** provided to CODA other than on-site during a site visit, any of the following information (“Sensitive Information” or “PII”):
 - Social Security number
 - Credit or debit card number or other information (e.g., expiration date, security code)
 - Drivers’ license number
 - Account number with a pin or security code that permits access
 - Health insurance information, such as policy number or subscriber I.D.
 - Medical information, such as information about an individual’s condition or treatment
 - Mother’s maiden name
 - Taxpayer ID number
 - Date of birth
 - Any data protected by applicable law (e.g., HIPAA, state data security law)
 - Biometric data, such as fingerprint or retina image
 - Username or email address, in combination with a password or security question that permits access to an online account

2. **Patient Identifiers.** Before submitting information about a patient to CODA other than on-site during a site visit, a program/institution **must remove the following data elements** of the individual, and of relatives, household members, and employers of the individual (the “Patient Identifiers”):
 1. Names, including initials
 2. Address (including city, zip code, county, precinct)
 3. Dates, including treatment date, admission date, age, date of birth, or date of death [a range of dates (e.g., May 1 – 31, 2015) is permitted provided such range cannot be used to identify the individual who is the subject of the information]
 4. Telephone numbers
 5. Fax numbers
 6. E-mail addresses
 7. Social Security numbers
 8. Medical record numbers
 9. Health plan beneficiary numbers
 10. Account numbers
 11. Certificate/license numbers
 12. Vehicle identifiers and serial numbers, including license plate numbers
 13. Device identifiers and serial numbers
 14. Web Universal Resource Locators (URLs)
 15. Internet Protocol (IP) address numbers
 16. Biometric identifiers (e.g., finger and voice prints)

17. Full face photographic images and comparable images
18. Any other unique identifying number, characteristic, or code:
 - that is derived from information about the individual
 - that is capable of being translated so as to identify the individual, or
 - if the mechanism for re-identification (e.g., the key) is also disclosed

In addition, the information provided to CODA cannot be capable of being used alone or in combination with other information to identify the individual.

3. **Redaction.** When removing any Sensitive Information or Patient Identifier from paper or electronic documents disclosed to CODA, programs/institutions shall **fully and appropriately** remove the data such that the data cannot be read or otherwise reconstructed. Covering data with ink is not an appropriate means of removing data from a hard copy document and may sometimes be viewable when such documents are scanned to an electronic format.
4. **Administrative fee.** *If the program/institution submits any documentation that does not comply with the directives noted above, CODA will assess an administrative fee of \$4000 to the program/institution; a resubmission that continues to contain prohibited data will be assessed an additional \$4000 fee.*
 - CODA Site Visitors and Commission volunteers are only authorized to access Sensitive Information and Patient Identifiers:
 - Onsite during a site visit, and
 - That are necessary for conducting the accreditation site visit
 - CODA Site Visitors and Commission volunteers may not download or make hard copies or electronic copies of Sensitive Information or Patient Identifiers.

NOTE: If a document includes fictitious information, which may otherwise appear to be Sensitive Information or Patient Identifiers, the program is expected to clearly mark the document as “Fictitious Example”.