Commission on Dental Accreditation
Predoctoral Dental Education Site Visitor Update

92nd ADEA Annual Session
Sunday, March 8, 2015
Site Visitor Update Goals

- To bring you up-to-date with current activities of the Commission
- To review policies/procedures particularly relevant to site visitors
- To brief you on the use of technology as it relates to site visits
- To remind you of travel reimbursement and other logistics
- To review current problems with Site Visitor Report writing

PARTICIPATION FROM SITE VISITORS
What’s New at CODA?

New Standards
And
Updated Policies
Proposed Accreditation Standards: Predoctoral

- **For Comment by June 1, 2015**
- **New 1-8** The sponsoring institution of the educational program **must** accept full responsibility for the quality of education provided in all affiliated sites.
Proposed Accreditation Standards: Predoctoral

**New 4-6** Any clinical practice model, established or renewed after January 1, 2016, including but not limited to private practice or community-based practice, not owned by an educational sponsoring institution, **must** have a written agreement, which is held with the sponsoring institution regarding off-campus learning experiences that meet accreditation standards or program requirements, and covers the following items of agreement:
Proposed Accreditation Standards: Predoctoral (cont.)

- a. Contingency plan developed by the sponsoring institution should an agreement be terminated;
- b. Inactive sites maintain resources as approved initially;
- c. Designation of the dean, or another person to whom the dean has delegated the responsibility of monitoring the supervision of the instruction and scheduling;
- d. Clinical assessment (formative and summative) and calibration of the program faculty, to ensure that all predoctoral dental students receive comparable instruction across sites and specialties;
- e. A location, equipment and facilities, and time available for use of the equipment and facilities are compatible with the instructional needs of the program; and
- f. Policies and procedures of the facility compatible with the goals and instructional needs of the predoctoral dental education program.
Proposed Accreditation Standards: Predoctoral

- **Student Services**
- **New 4-7** Student services **must** include the following:
  - a. personal, academic and career counseling of students;
  - b. assuring student participation on appropriate committees;
  - c. providing appropriate information about the availability of financial aid and health services;
  - d. developing and reviewing specific written procedures to ensure due 30 process and the protection of the rights of students;
  - e. student advocacy; and
  - f. maintenance of the integrity of student performance and evaluation records.
  - g. instruction on personal debt management and financial planning.
Proposed Accreditation Standards: General Interest

- For Comment by June 1, 2015:
  - Dental Hygiene Education Programs, specifically Standard 2-18
  - Advanced Specialty Education Programs in Prosthodontics
Addition to Predoctoral Standard 5-8: For Immediate Implementation

5-8 The dental school must establish and enforce a mechanism to ensure adequate preclinical/clinical/laboratory asepsis, infection and biohazard control and disposal of hazardous waste, consistent with accepted dental practice.
Addition to Predoctoral Standard 4-3: For Immediate Implementation (Common to all Standards)

4-3 Students with advanced standing must receive an individualized assessment and an appropriate curriculum plan that results in the same standards of competence for graduation required by students regularly enrolled in the program.

Intent: Advanced standing refers to applicants that may be considered for admission to a training program whose curriculum has been modified after taking into account the applicant’s past experience. Examples include transfer from a similar program at another institution, completion of training at a non-CODA accredited program, or documented practice experience in the given discipline. Acceptance of advanced standing students/residents will not result in an increase of the program’s approved number of enrollees. Applicants for advanced standing are expected to fulfill all of the admission requirements mandated for students/residents in the conventional program and be held to the same academic standards. Advanced standing students/residents, to be certified for completion, are expected to demonstrate the same standards of competence as those in the conventional program.

Examples of evidence to demonstrate compliance may include:
- Policies and procedures on advanced standing
- Results of appropriate qualifying examinations
- Course equivalency or other measures to demonstrate equal scope and level of knowledge
Predoctoral: Overview

- 65 predoctoral programs

- 7 developing programs (initial accreditation)

- 2 fully operational programs with reporting requirements

- All others are accredited without reporting requirements
Predoctoral Standards

- Period of Implementation: One and one half years
- Implementation: July 1, 2013
- TOTAL: 3 + years

- Commission expectation is that the programs demonstrate compliance with all Standards through documentation and implementation
Predoc Standards

- Predoc site visitor training: January 2013
- Plans for future training: Fall 2015
Sources with Standards document; not Standards themselves

- Preface
- Terminology
- Statements of Intent
- Examples of Evidence
Performance Data on New Standards

- Minimal data
- No Trend
- Vast Majority of Predoctoral Programs are in Compliance
Annual Survey – Related Information for 2014-15

- Descriptive Questions of the Curriculum Survey to be implemented
- Revised clock-hour categories of the Curriculum Survey
- Retention of a Student Roster survey (Group II survey) as part of the Commission’s Annual Survey but the data will be collected in the aggregate, by class, and not at the level of the students
Current Policies and Procedures Reminder
Accreditation of Off-Campus Sites

Policy *Revised*

- **Primary site**: The sponsoring institutional site for an accredited program is the primary site. This site holds responsibility for clinical or didactic learning experiences that meet the accreditation standards for a specific program. The site further holds responsibility for the written agreement with off-campus sites to meet accreditation standards.

- **Off-campus site**: A training site located away from the primary site. For students/residents in a specific program, an off-campus site could be their principal learning site. An off-campus site could be one of the following:
  - A site with which a written agreement is held with the sponsoring institution regarding off-campus learning experiences that meet accreditation standards.
  - A site owned/operated by the sponsoring institution that provides additional learning experiences that meet accreditation or program requirements and does not require a separate written agreement.
Accreditation of Off-Campus Sites Policy *Revised*

- Optional Enrichment/Optional Observation
  - A site utilized for the purposes of providing *elective* enrichment or *observational* experiences.
  - Students assigned to these sites are not evaluated on achieving program or accreditation requirements.
  - These sites do not require Commission approval.
Establishing New Off-Campus Sites

- When a program plans to initiate a new off-campus site (distance site and/or additional training site not located on the main campus), the Commission must be informed in writing at least one (1) month prior to a regularly scheduled Review Committee meeting (January/July).
- Review and approval by CODA must be taken prior to initiating use of the off-campus site.
- The Commission may conduct a special focused site visit to each off-campus location where a significant portion of each student’s educational experience is provided.
- Additional fees will be assessed to the program for the conduct of these visits.
  - A new administrative fee of $4,000.00 plus actual expenses to conduct the visit will be billed to the institution.
Off-Campus Sites

- Visiting off-campus sites already approved is determined by the visiting committee or in consultation with Commission staff.

  - The 20% benchmark rule is no longer used.

- Staff routinely does not hear from visitors regarding off-campus sites.
Off-Campus Sites

- Spring 2015 CODA will be sending a survey to all programs asking to identify all off-campus sites (didactic and clinical). The completion of the survey is mandatory.
HIPAA compliance for Site Visitors

- CODA must verify that all site visitors have received HIPAA training
  - Annual record of completion required
- Training materials and certificate e-mailed to you annually
- All site visitors MUST review, sign and return certificate. Can’t participate in a site visit without certificate on file.
HIPAA/PII reminders for Site Visitors

- Review HIPAA/PII Reminder For Site Visitors document
- Carefully review Self-Study Guide for any PHI or PII that is not redacted or not appropriately redacted
- Notify CODA staff immediately
HIPAA/PII reminders for Site Visitors

- If identified:
  - Site Visitors are instructed to securely dispose of (shred paper and CD or “pulverize” USB) and notify CODA when done.
  - Confirm disposal to CODA staff by replying to team email.
  - Program instructed to send a new electronic version of the self-study, which either does not include the information or is appropriately redacted.
HIPAA/PPI reminders for Site Visitors

- Immediately report any lost or stolen CODA or program materials
- Immediately report any lost or stolen devices (e.g. laptop, USB, CD)
Document management
Post site visit

- Remember procedures for disposal of all program materials after the site visit
  - Shred paper documents and CD following the visit
  - “Hard” delete all e-mails pertaining to the visit
  - Pulverize the USB following the visit

- Reminder from CODA office to visitors at end of month of the visit they conducted
Business Associate Agreement (BAA)

- All programs must have a BAA on file or site visit will not take place
Conflict of Interest Policy
Updated Summer 2014

- For serving on a site visit team:
  - You must not have served on a prior site visit team to that program in the last ten (10) years
  - You must not be a former employee of the program or institution
Conflict of Interest-Consulting Review Committee Members

- Review Committee members **may not** independently consult with a CODA-accredited program or a program applying for CODA accreditation
- Review Committee members **may not** serve as a mock site visitor
Conflict of Interest

- The site visitor is obligated to report any conflict of interest – real or perceived

- If you think you have a conflict of interest, contact Commission Staff

- **New** policy change that allows CODA-appointed site visitors to conduct “mock site visits” under certain conditions
Conflict of Interest

- Both the site visitor and the relevant program personnel must complete the conflict disclosure.
- Form must be dually signed by site visitor and program to be visited and returned to CODA office.
- Review Committee members can only participate as a site visitor if necessary.
- Commissioners cannot serve as a site visitor.
A conflict of interest exists if you...

- are a graduate of a program at the institution;
- have served as a site visitor, consultant, employee or appointee to the institution;
- have a family member who is employed or affiliated with the institution;
- have a personal or professional relationship with key personnel in the institution/program;
- are affiliated with an institution/program in the same state;
- are a resident of the state.
Scheduling of and Communicating with Visiting Committee for Predoctoral Programs

- Complete Form identifying availability
  - Sent annually in summer for next year
- To be considered for a visit, the Form must be completed and returned to the CODA office
- Based upon conflict of interest factors, including the program’s screening listing, invitations are issued
- Confirmation of assignment sent from CODA office
- Information for team members is sent in one email approximately 2 months before the visit
- Self Study sent directly to team from program at approximately the same time
Use of Technology & Site Visit Logistics
Current Use of Technology

- Resource for programs preparing for a site visit.
  - Site Visit Orientation Web Site
- Method by which site visit materials are distributed to programs and site visitors.
  - Via E-mail
- Method by which site visit team and CODA staff communicate.
  - Via E-mail
- Please make sure CODA has most current contact information, including e-mail.
Commission’s website on ADA.org

- Standards, Self-Study, Citings, and SVER
- Policy and Procedures
- CODA Communicator (E-Newsletter)
  - Information on Hearings/Call for Comments on proposed new & revised accreditation standards.
  - Recently adopted accreditation standards and policy.
  - Dates of Commission meetings.
  - Upcoming site visits.
- CODA Alerts
New Website Spring 2014
New Website Spring 2014

CODA
Commission on Dental Accreditation

ACCREDITATION SITE VISITS STANDARDS FIND A PROGRAM POLICIES/GUIDELINES CONTACT

Site Visits
- Site Visit Process & Schedule
- Prep for DDS/DMD Site Visit
- Prep for Advanced Site Visit
- Prep for Allied Site Visit

Site Visits

- The Site Visit Process
- Coordinated Site Visits

The Site Visit Process

The Commission on Dental Accreditation evaluates the educational quality of dental and dental-related programs in the United States. All 50 states plus Puerto Rico and the District of Columbia recognize the Commission’s
New Website Spring 2014

The Commission on Dental Accreditation (CODA) works to maintain the highest professional and ethical standards in the nation's dental schools and programs.

The CODA employs a collaborative peer review accreditation process to evaluate the quality of over 1,450 dental and dental-related education programs nationwide, including dental, advanced general dentistry, advanced specialty, clinical fellowship and allied dental programs.
New Website Spring 2014
Travel Reimbursement & Site Visit Logistics
E-Mail from CODA to Site Visitor: Prior to Site Visit

- Site visit forms/logistical information E-Mailed (zipped):
  - Scroll Down for:
    - Standards and SVER (use most current)
    - Previous site visit report and background information*
    - Program history (Data Profile)*
    - Reimbursement form
    - Site visit hotel confirmation
    - Online flight booking procedures
    - Site visit manual, including HIPAA/PII reminders
    - Tentative schedule

*
Team Email: Affiliated Sites Form

- Carefully review in accord with revised policy
- Respond due 2-3 weeks after receipt of the email
E-Mail from CODA to Site Visitor: Prior to Site Visit

- Sent 2 to 3 months prior to visit with team email
- Staff recommends zipped attachments and email be Saved & Downloaded
- Maintain materials securely per HIPAA/PII CODA policy
E-Communication from Institution to Site Visitor

- Programs asked to send paper and electronic copy of self-study to Site Visit Team. E-SSG may be sent by CD or USB drive. *E-mail delivery is not acceptable.*

- Check “spam” filters if missing communication from CODA or program.
Site Visitor Planning for Site Visit

Once CODA and Program materials received:

- Review tentative agenda and provide feedback when indicated
- Review self-study for completeness, consistency, and correctness and PII and PHI
- **Staff** communicates with program to initiate pre-visit planning
- Contact CODA office if any questions or concerns
Site Visitor Planning for Site Visit

- Request additional information (before or during the visit)
  - Through the staff (staff to attend visit)
Additional Site Visitor Reminders

- Institutional personnel at a level above the program director must be at initial and final conferences.

- The program director and administrators should NOT attend the faculty interviews.
Additional Site Visitor
Reminders Cont.

- The state board representative should only participate if the Commission has informed you of their planned attendance.
  - Contact CODA staff immediately if an unexpected state board representative is on the visit
  - If attending, the state board will be identified on the team roster
  - The state board is not a voting member of the team, he/she is an observer, not trained although does sign confidentiality agreement
  - Not a silent observer
Additional Site Visitor Reminders Cont.

- Additional participants may include silent observer or Review Committee member/Commissioner who are not “silent”
E-Mail from CODA to Site Visitor: After the Site Visit

Post-Site Visit Survey

Confidentially distributed & data presented in aggregate format.

- Request feedback on logistics
- Request feedback on process
- Request feedback on co-visitor(s)
- Results reviewed to assess areas where training and process can be strengthened.

Link is from Health Policy Institute
Site Visitor Travel and Logistics

- Gant Travel
  - 1-877-924-0306
  - www.ganttravel.com
  - Online booking preferred
  - Failure to use Gant Travel may jeopardize your reimbursement

- Save receipt for reimbursement
- Ensure receipt for air arrangements even though paid by ADA
Word from ADA Travel Manager…

- Continue to make travel reservations as early as possible
- Be flexible whenever possible
- Be aware flights sell out quickly at the lower fares during winter and summer months
Site Visitor Travel and Logistics

- Important Phone Numbers
  - Gant Travel
    - Daytime – 1-877-924-0306
    - Emergency after hours – 1-877-924-0306 (reference 96W)
  - CODA Staff
  - May wish to arrange for Gant’s Trip Alert
Site Visitors Must …

- Use **Gant Travel** to book airline tickets
- Get prior approval from appropriate staff for rental car or additional nights stay due to travel difficulties
- Pay your final hotel bill; make sure hotel receipt has zero (0) balance; you will be reimbursed
- Not make arrangements to depart until the final conference is over
Reimbursements

- The ADA Travel and Expense Reporting policy requires that all **travel expense forms be submitted within 30 days of the travel return date.**
- **Forms submitted after 60 days will not be reimbursed, there will be no exceptions.**
  - You are encouraged to use Concur (on-line reimbursement) if trained
  - If not trained but interested, training can be arranged; addressed in latest ADA Volunteer Travel & Expense Policy
Reimbursements

- Sign reimbursement and submit original receipts, including airfare and hotel (keep a copy for yourself)
- Processed upon receipt, cannot guarantee specific return time
- Luggage fee reimbursed (1 piece)
- Send reimbursements directly to Ms. Marjorie Hooper -- NOT accounting
New Travel Procedure

- When conducting a small visit (usually 10 visitors or under), hotel reservations are made by the individual site visitors through GANT.
- Otherwise, Commission makes the hotel reservation for the entire team.
The Site Visit Report
The Site Visitor Evaluation Report (SVER)

- All sections/questions must be answered
- Compliance with Commission Policies
  - Program Change
  - Third Party Comment
  - Complaint Policy
  - Distance Education
  - Program Effectiveness
Additional Requirements for Compliance with Complaint Policy

- Asked to verify that there are no patterns or themes related to the program’s compliance with the Accreditation Standards?

- If there are patterns noted, describe the specific standards in question and identify any recommendations or suggestions that resulted from this review.
Anonymous Complaints

- Unsigned comment/complaint submitted to CODA
- Added to the program’s file for evaluation during the next scheduled site visit.
- The program will have an opportunity to respond; response will be considered during the site visit evaluation.
- Site visit team will receive the anonymous comment/complaint and program response
Distance Education Policy

- Programs that offer distance education must have processes in place through which the program establishes that the student who registers in a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit.
  - Programs must verify the identity of a student who participates in class or coursework by using, at the option of the program, methods such as a secure login and pass code; proctored examinations; and/or new or other technologies and practices that are effective in verifying student identity.
  - The program must make clear in writing that processes are used that protect student privacy and programs must notify students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.
Program Effectiveness

1. Confirm that the institution/program is assessing student achievement and provide a detailed analysis of the program’s performance with respect to student achievement. Include a description of the assessment tools used by the program and a summary of data and conclusions.
Program Effectiveness

2. Describe the positive and negative program outcomes related to the program’s student achievement measures. Describe program changes made in accordance with outcomes data collected. Conversely, describe areas where program change has not been made in accordance with outcomes data collected.
Program Effectiveness

3. Identify specific standards where recommendations or suggestions are written related to student achievement.
Obligation of “Due Diligence”

- Institutional Accreditation is an Example
  - Check institutional accreditor
  - Check certificate and/or most recent letter from accreditor
  - If sponsoring organization has reporting requirements, investigate whether the reporting impacts the dental school

- Part of Verification of self-study information which is pre-verified
The Written Report: Review of the Basics

- Information taken from the SVER
- The bridge between the site visit and review by the Review Committee and Commission.
- Your report, along with the program’s response (if there is one) is the only information the Review Committee will have to make a recommendation to the Commission. They will not have the self-study.
- The report must contain enough background and details in order to make decisions.
- Do not start with your conclusions.
Writing a Recommendation

- A recommendation is written when an area of non-compliance has been identified.
- A rationale must be included. Why are you writing a recommendation?
- May help to answer the following questions:
  - What precisely is the issue?
  - What does the program currently provide?
    - How is it provided?
    - How well does it work?
  - To what extent are students gaining the required training and experience?
  - What training and experiences are the students not gaining?
Writing the Recommendation

- The narrative/recommendation cannot be prescriptive. Tell the institution what the deficiency is, not how to “fix” it.

- Provide as much detail as possible.

- Restate the standard, use the “stem.” “It is recommended…..” Include only those aspects of the standard that are not being met.

- Treat each circled NO as a separate issue and provide rationale for each.

- Cite multiple sources
Writing a Suggestion

- Program is in compliance, but could be improved.
- Emphasis is on enhancing compliance; not to provide a “favor”
- Watch prescriptiveness
- Program is not obligated to address in response.
- Written in the basic format of a recommendation:
  - Must relate to a Standard
  - Cite multiple sources, if applicable
  - Provide the “story.”
  - Begin with “It is suggested…..”
Other Information re: Site Visit Report

- No written commendations
- No written “strengths”
- May include comments that document a specific situation that could be useful for future site visits (e.g., new clinic under construction)
Clarity and Completeness

- Be simple and direct.
- The report should be a straightforward and detailed explanation of your findings.
- Keep your audience in mind.
- Your report is a record of the site visit. When the Commission meets it relies on your report. It is crucial that it is complete and detailed.
After the team approves the Site Visit Report:

- Forwarded to the institution. Directed to prepare a response, if applicable
- Review committee considers the site visit report, along with the program’s response
- Makes a recommendation to the Commission regarding accreditation status
- Suggestions cannot become recommendations
- Recommendations can become suggestions or be removed if RC deems appropriate
- CODA makes final accreditation decision
Site Visitor Dos and Don’ts
Site Visitor Dos

- **Do** consult CODA staff if changes to the site visit agenda are desired.

- **Do** consider splitting up site visitor duties (e.g. one person reviews documentation, one person tours facilities) if it appears time is running out.

- **Do** inform the program early in the process of all materials to be reviewed on-site and maintain communication early and throughout the process.

- **Do** assess the program according to established, *current* Accreditation Standards, not according to personal preferences.
More Site Visitor Do’s

- **Do** utilize multiple sources when verifying information and determining compliance with Standards.

- **Do** consider all information gathered before, during and after the site visit to be CONFIDENTIAL.

- **Do** agree to speak with student(s) upon their request.

- **Do** appropriately delete/destroy all site visit materials following approval of the draft report.

- **Do** promptly respond to staff requests for clarification; each member must approve the written draft report.

- **Do** complete the post-site visit survey and reimbursement form on a timely basis.

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Site Visitor Don’ts

- Don’t be overly critical, negative or judgmental.
- Don’t bring your biases on the site visit.
- Don’t use your cell phone, iPad or other devices (even for checking messages or texting) during sessions with the program or during interviews.
- Don’t compare the program to your own.
- Don’t be prescriptive when writing the report.
- Don’t make suggestions and/or recommendations as a “favor” to the program.
More Site Visitor Don’ts

- Don’t qualify the results of the site visit (e.g. “the recommendations are “tiny,” “easy to fix”).
- Don’t accept social invitations or gifts from the hosts.
- Don’t leave the self-study at the institution if you have made notes in it. Suggestion: use “post it” notes that can be removed from self-study.
- Don’t leave the institution prior to the final conference.
- Don’t use outside information
In Closing…
Site Visitor Nominations

- Reviewed at Winter Meetings;
- Review of Nominees at Summer Meetings occurs when need arises
- ADA membership required
- 1-year term, renewable for 6 years
- Contact staff for nomination form
Need for More Predoctoral Site Visitors

- National Licensure
- Clinical Sciences
- Finance
- Chairs
Other Opportunities for Predoctoral Accreditation Activities

- General Dentist Education for Predoc Review Committee (PREDOC RC)

- Public Members
  - Exempted from obligatory minimal one year between two terms
Ongoing Site Visitor Activity

- Site Visitors who have not been assigned on a site visit during the previous two years must re-attend the in-house training provided to new site visitors, observe a site visit in the appropriate discipline, or attend the regularly scheduled update sessions at the American Dental Education Association (ADEA) Annual Meeting, before being assigned to evaluate a program on a site visit.
CODA Question and Answer Room at ADEA Meeting

Sunday, March 8, 2015
4:00 - 6:00 pm
Gardner Room, 3rd Floor
Sheraton Hotel
Boston

* Check ADEA schedule for final room assignment
Staff Contact:

Catherine A. Horan, Ph.D., manager, horanc@ada.org

Predoctoral Dental Education