At its August 3, 2017 meeting, the Commission on Dental Accreditation, the only nationally-recognized accrediting agency for dental, allied dental and advanced dental education programs, reviewed the progress report of the pediatric dentistry program offered by the MetroHealth Medical Center in Cleveland, Ohio. On the basis of information provided to the Commission by the program, the Commission has issued the accreditation status of “withdraw” to the program.

The Commission determined at its August 3, 2017 meeting that the program was not in compliance with the Accreditation Standards for Pediatric Dentistry Education Programs. Specific concerns in compliance with the standards were noted in the following areas:

- Program Director (sufficient authority and time to fulfill administrative and teaching responsibilities);
- Clinical Experience-Behavior Guidance (adequate number of patient encounters in which students/residents achieve competence in patient management using behavior guidance, including adequate numbers of sedation cases);
- Clinical Experience (adequate number of patient encounters in which students/residents achieve competence in treatment of conditions that can be corrected or improved by early interventions that might require guidance of eruption, space supervision, and interceptive orthodontic treatments).

The Commission informed the program and sponsoring institution that the non-compliance with the aforementioned areas would need to be addressed before a new application for accreditation could be considered.

Dr. Akram Boutros, CEO  
MetroHealth Medical Center  
Cleveland, Ohio  
8/9/2017

Dr. Harold Mark Livingston  
Chair, Commission on Dental Accreditation  
Chicago, Illinois  
8/15/2017
Via Email Delivery

August 23, 2017

Dr. Akram Boutros
President
The MetroHealth System
Office of the Chief Executive Officer
2500 MetroHealth Drive
Cleveland, OH 44109

RE: Pediatric Dentistry Program

Dear Dr. Boutros,

As you are aware, on August 7, 2017, the Commission on Dental Accreditation notified your institution that it had taken action to withdraw the accreditation of the pediatric dentistry program sponsored by the MetroHealth Medical Center in Cleveland, Ohio. The program was provided an opportunity to appeal the Commission’s discussion within fourteen (14) days of receipt of the Commission’s letter (no later than August 22, 2017).

The institution was also requested to review, sign and submit the signed disclosure statement regarding the decision by the Commission to withdraw the program’s accreditation. The institution was provided an opportunity to identify factual inaccuracies within the statement and to make official comments with regard to the Commission’s decision, or state that the affected institution has been offered the opportunity to provide official comment. The Commission received the institution’s signed disclosure statement on August 14, 2017; the program did not provide an official comment regarding the Commission’s decision. A copy of the dually signed disclosure statement was provided to you on August 15, 2017. The Commission understands the program has elected not to appeal the Commission’s August 3, 2017 decision, since no request for an appeal was submitted to the Commission’s office by the August 22, 2017 deadline.

Therefore, this letter serves as the terminal communication that the Commission’s action to withdraw accreditation to the pediatric dentistry program is final and will be made public through the Commission’s website and letters to appropriate regulatory agencies.

As noted in previous communications, Regulation 602.26 of the U. S. Department of Education’s Procedures and Criteria for the Recognition of Accrediting Agencies requires that any final decision to withdraw the accreditation of a program be reported to such entities as the Secretary of Education, and the appropriate entities, including the public. The final disclosure and
program’s statement will be distributed to the Secretary of Education, appropriate state licensing and authorizing agencies, to any appropriate institutional accrediting agency and to the public.

Again the Commission reminds your institution that when accreditation is withdrawn from a program by the Commission, students/residents currently enrolled in, and who successfully complete, the program are considered graduates of an accredited program. Students/Residents who enroll following such action will not be considered graduates of a Commission-accredited program. Such graduates may be ineligible for pediatric dentistry certification or licensure examinations. Additionally, it should be noted that upon withdrawal of accreditation by the Commission, the program is no longer recognized by the United States Department of Education. In view of this, the Commission wishes to again advise you that this action may have legal implications for your institution. You should consult with your institution’s legal counsel regarding how and when to advise applicants and students/residents of the Commission’s action and implications for the students/residents. A copy of the Commission’s Evaluation and Operational Policies and Procedures may be accessed at the link provide below.

The Commission wishes to thank you for your past cooperation. Should the program be reestablished, the Commission would be pleased to consider an application for accreditation.

If you or members of your staff have questions about the Commission’s action, Commission policy, or the application process, please contact me by telephone, at 1-800-621-8099, extension 2940 or by e-mail, at tookss@ada.org.

Sincerely,

Sherin Tooks, Ed.D., M.S.
Director, Commission on Dental Accreditation

ST/cb/mh

cc: Dr. Christopher Brandt, chair, Department of Dentistry, MetroHealth Medical Center  
Dr. James Kozik, program director, Pediatric Dentistry Program  
Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education (CODA Letter, Program Letter, Disclosure)  
Mr. Harry Kamdar, executive director, Ohio State Board of Dentistry (CODA Letter, Program Letter, Disclosure)  
Dr. Mark Chassin, president and chief executive officer, Joint Commission, (CODA Letter, Program Letter Disclosure)  
Dr. Harold Mark Livingston, chair, Commission on Dental Accreditation  
Ms. Cathy Baumann, manager, Advanced Specialty Education, CODA  
Ms. Cathryn Albrecht, senior associate general counsel, CODA
August 15, 2017

Dr. Akram Boutros
President
The MetroHealth System
Office of the Chief Executive Officer
2500 MetroHealth Drive
Cleveland, OH 44109

RE: Pediatric Dentistry Program

Dear Dr. Boutros,

On August 7, 2017, the Commission on Dental Accreditation notified your institution that it had taken action to withdraw the accreditation of the pediatric dentistry program sponsored by the MetroHealth Medical Center in Cleveland, Ohio. The program was provided an opportunity to appeal the Commission’s discussion within fourteen (14) days of receipt of the Commission’s letter (no later than August 22, 2017).

Alternately, if the institution elected to not appeal the decision, the institution was requested to review, sign and submit the signed disclosure statement regarding the decision by the Commission to withdraw the program’s accreditation. The institution was also provided an opportunity to identify factual inaccuracies within the statement and to make official comments with regard to the Commission’s decision, or state that the affected institution has been offered the opportunity to provide official comment. The Commission received the institution’s signed disclosure statement on August 14, 2017; however, the program did not provide an official comment regarding the Commission’s decision. Attached for your record is a dually signed disclosure statement.

Regulation 602.26 of the U. S. Department of Education’s Procedures and Criteria for the Recognition of Accrediting Agencies requires that any final decision to withdraw the accreditation of a program be reported to such entities as the Secretary of Education, and the appropriate entities, including the public. The final disclosure and program’s statement will be distributed to the Secretary of Education, appropriate state licensing and authorizing agencies, to any appropriate institutional accrediting agency and to the public.

Please note that when accreditation is withdrawn from a program by the Commission, students/residents currently enrolled in, and who successfully complete, the program are considered graduates of an accredited program. Students/Residents who enroll following such action will not be considered graduates of a Commission-accredited program. Such graduates may be ineligible for pediatric dentistry certification or licensure examinations. Additionally, it
should be noted that upon withdrawal of accreditation by the Commission, the program is no longer recognized by the United States Department of Education. In view of this, the Commission wishes to again advise you that this action may have legal implications for your institution. You should consult with your institution’s legal counsel regarding how and when to advise applicants and students/residents of the Commission’s action and implications for the students/residents. A copy of the Commission’s Evaluation and Operational Policies and Procedures may be accessed at the link provide below.

The Commission wishes to thank you for your past cooperation. Should the program be reestablished, the Commission would be pleased to consider an application for accreditation.

If you or members of your staff have questions about the Commission’s action, Commission policy, or the application process, please contact me by telephone, at 1-800-621-8099, extension 2940 or by e-mail, at tookss@ada.org.

Sincerely,

Sherin Tooks, Ed.D., M.S.
Director, Commission on Dental Accreditation

ST/cb/mh

Enclosures:  Signed Disclosure Statement
Evaluation and Operational Policies and Procedures:

cc:

Dr. Christopher Brandt, chair, Department of Dentistry, MetroHealth Medical Center
Dr. James Kozik, program director, Pediatric Dentistry Program
Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education (CODA Letter, Program Letter, Disclosure)
Mr. Harry Kamdar, executive director, Ohio State Board of Dentistry (CODA Letter, Program Letter, Disclosure)
Dr. Mark Chassin, president and chief executive officer, Joint Commission, (CODA Letter, Program Letter Disclosure)
Dr. Harold Mark Livingston, chair, Commission on Dental Accreditation
Dr. Sherin Tooks, director, CODA
Ms. Cathryn Albrecht, senior associate general counsel, CODA
August 7, 2017

Mr. Akram Boutros
President
The MetroHealth System
Office of the Chief Executive Officer
2500 MetroHealth Drive
Cleveland, OH 44109

RE: Pediatric Dentistry Program

Dear Mr. Boutros,

As you may recall, the pediatric dentistry program sponsored by MetroHealth Medical Center in Cleveland, Ohio was granted the accreditation status of “approval with reporting requirements” by the Commission on Dental Accreditation at its February 4, 2016 meeting. The accreditation status definition of “approval with reporting requirements” states: “Evidence of compliance with the cited standards or policies must be demonstrated within a timeframe not to exceed eighteen (18) months if the program is between one and two years in length or two years if the program is at least two years in length. If the deficiencies are not corrected within the specified time period, accreditation will be withdrawn, unless the Commission extends the period for achieving compliance for good cause. Identification of new deficiencies during the reporting time period will not result in a modification of the specified deadline for compliance with prior deficiencies.”

At its February 4, 2016 meeting, the Commission also requested a special focused site visit be conducted prior to the February 2, 2017 meeting.

At the August 4, 2016 meeting, the Commission reviewed the progress report submitted on May 25, 2016 and the Commission continued the program’s accreditation status of “approval with reporting requirements”.

At its February 2, 2017 meeting, the Commission reviewed the special focused site visit report and the subsequent progress report that was submitted. Further, due to the nature of the noncompliance with Commission accreditation standards, the Commission noted its
intent to withdraw accreditation at its August 3, 2017 meeting if compliance could not be demonstrated. The definitions of accreditation classifications are enclosed.

At its August 3, 2017 meeting, the Commission considered the May 19, 2017 progress report on the pediatric dentistry program and determined that recommendations #1, 2, and 3 contained in the special focused site visit report adopted on February 2, 2017 remain unmet.

Accordingly, the Commission adopted a resolution to withdraw accreditation from the pediatric dentistry program.

This action was taken in accordance with the Commission’s Rules (Article III and Article IV, Sections 4 and 5), which state that the educational program may appeal the Board of Commissioners’ decision. Your written appeal must be received by the Director of the Board of Commissioners within fourteen (14) days of receipt of this letter (no later than August 22, 2017). The filing of an appeal shall automatically stay the final decision of the Board of Commissioners. If the program does not file a timely appeal of the Board of Commissioners’ findings and decisions, the decision shall become final. A copy of the Rules is enclosed for your information.

The Appeal Board is an autonomous body, separate from the Commission. The principal function of the Appeal Board is to determine whether the Commission on Dental Accreditation, in arriving at a decision regarding the withdrawal or denial of accreditation for a given program, has properly applied the facts presented to it. In addition, the Commission’s Rules stipulate that the Appeal Board shall provide the educational program filing the appeal the opportunity to be represented by legal counsel and shall give the program the opportunity to offer evidence and argument in writing and/or orally to try to refute or overcome the findings and decision of the Commission.

Also, to ensure due process, the Appeal Board will, when appropriate, review substantive procedural issues raised by the appellants. To this end, the Appeal Board is limited in its inquiry to the factual determinations up to the time of the Commission on Dental Accreditation’s decision regarding the status of the program at issue.

It is not proper for the Appeal Board to either receive or consider facts not previously presented to the Commission on Dental Accreditation since it does not sit as an initial reviewing body. Similarly, it is not the function of the Appeal Board to determine whether the facts, singularly or cumulatively, justify the decision of the Commission on Dental Accreditation unless it can be shown that the decision was clearly against the manifest weight of the evidence. Further, the Appeal Board will not hear testimony relative to the reasonableness of previously determined requirements for accreditation since this is clearly outside the scope of authority of this reviewing body. The Appeal Board may make the
following decisions: to affirm, amend, remand, or reverse the adverse actions of the Commission.

Also enclosed is a disclosure statement regarding the decision by the Commission to withdraw the program’s accreditation. Regulation 602.26 of the U. S. Department of Education’s Procedures and Criteria for the Recognition of Accrediting Agencies requires that any final decision to withdraw the accreditation of a program be reported to such entities as the Secretary of Education, and the appropriate entities, including the public. You are requested to review this statement and, if in agreement, sign and return one (1) original copy to this office. If you believe there to be a factual inaccuracy within this statement, please notify this office in writing. You may also make official comments with regard to the decision, or state that the affected institution has been offered the opportunity to provide official comment. A response to this disclosure and any comment the institution wishes to submit must be received no later than August 22, 2017. The final disclosure and program’s statement will be distributed to the Secretary of Education, appropriate state licensing and authorizing agencies, to any appropriate institutional accrediting agency and to the public.

Please note that when accreditation is withdrawn from a program by the Commission, students/residents currently enrolled in, and who successfully complete, the program are considered graduates of an accredited program. Students/Residents who enroll following such action will not be considered graduates of a Commission-accredited program. Such graduates may be ineligible for pediatric dentistry certification or licensure examinations. In view of this, the Commission wishes to advise you that this action may have legal implications for your institution. You should consult with your institution’s legal counsel regarding how and when to advise applicants and students/residents of the Commission’s action and implications for the students/residents. A copy of the Commission’s Evaluation and Operational Policies and Procedures may be accessed at the link provide below.

The Commission wishes to thank you for your past cooperation. Should the program be reestablished, the Commission would be pleased to consider an application for accreditation.

If you or members of your staff have questions about the Commission’s action, Commission policy, or the application process, please contact me by telephone, at 1-800-621-8099, extension 2672 or by e-mail, at baumann@ada.org.
Sincerely,

Catherine A. Baumann, M.A.P.S
Manager, Advanced Specialty Education
Commission on Dental Accreditation

CB/

Enclosures:    CODA Accreditation Status Definitions
                Due Process Related to Withdrawal of Accreditation
                Notice of Reasons for Adverse Actions
                Procedure for Disclosure Notice of Adverse Actions
                Rules of the Commission on Dental Accreditation
                Disclosure Statement
                Evaluation and Operational Policies and Procedures

cc:    Dr. Christopher Brandt, chair, Department of Dentistry, MetroHealth Medical Center
        Dr. James Kozik, program director, Pediatric Dentistry Program
        Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education (via CODA website)
        Mr. Harry Kamdar, executive director, Ohio State Board of Dentistry (via CODA website)
        Dr. Mark Chassin, president and chief executive officer, Joint Commission, (via CODA website)
        Dr. Harold Mark Livingston, chair, Commission on Dental Accreditation
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1. Program Director (sufficient authority and time to fulfill administrative and teaching responsibilities);
2. Clinical Experience-Behavior Guidance (adequate number of patient encounters in which students/residents achieve competence in patient management using behavior guidance, including adequate numbers of sedation cases);
3. Clinical Experience (adequate number of patient encounters in which students/residents achieve competence in treatment of conditions that can be corrected or improved by early interventions that might require guidance of eruption, space supervision, and interceptive orthodontic treatments).

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_______________________________________________________________
Mr. Akram Boutros, CEO (date)
MetroHealth Medical Center
Cleveland, Ohio

_______________________________________________________________
Dr. Harold Mark Livingston (date)
Chair, Commission on Dental Accreditation
Chicago, Illinois