

# Commission on Dental Accreditation Orientation for Advanced Dental Education Programs with Site Visits 2024-2026

Monday, April 8, 2024

We will begin soon...

Recording of this meeting is prohibited

## Purpose of Site Visit Orientation

- To review the accreditation process, including:
  - Timeline for Mailings and Communications from the CODA Office
  - The Self-Study Process
  - Conduct of the Site Visit
  - After the Site Visit
  - Update on Policies and Procedures
  - What's New at CODA
  - New and Proposed Standards Revisions
  - Online Resources

# Timeline for Communications from the CODA Office

#### Site Visit Letter #1: Notification of Site Visit

- Sent approximately 1 year prior to the site visit
- Letter to CEO, CAO and Director (via e-mail)
  - Confirmation of Site Visit Date Form return of form required
  - Institutional Officers, Program Director and Personnel Data Forms return of forms required
    - Please note: Noting changes in program leadership on this form is not an acceptable way to report changes. Changes must be reported following the Reporting Program Changes process.
  - Sites Where Education Activity Occurs Form return of form required
  - Accreditation Standards, Self-Study Guide, Site Visitor Evaluation Report (SVER) – link to CODA website
  - Electronic Submission Guidelines link to CODA website
  - Privacy and Data Security Reminder link to CODA website
  - It is very important that you return the above documents by the due date to move forward with scheduling your site visit.

### Sites Where Educational Activity Occurs Form

- All sites (not the main program location) and all program rotations must be documented (clinical and didactic)
- Site visit team will review this form and determine which sites will be included in the visit (virtual, hybrid, or inperson)
- If the visit must be extended to accommodate travel to sites during the visit, the program is responsible for additional expenses and will be invoiced following the visit
- More discussion later

#### Guidelines for Return of Forms

 Please centralize the return of all forms through the designated Institutional Site Visit Coordinator/Program Director

 Return one (1) complete set of forms within a single submission

Please return forms with all data completed

#### Site Visit Letter #2: Acknowledgement of Site Visit

- Sent approximately 2-3 months after the program has returned requested documentation from Site Visit Letter #1
- Letter and forms to Director (via e-mail); copies to CEO and CAO
  - Provided there is enrollment in program
- State Board Participation Form return of form required
- Site Visitor Screening Lists return of form required
- Policy on Site Visitors
- Policy on Complaints Directed at CODA-accredited Programs
- Policy on Conflict of Interest
- Frequency of Citings
- Third Party Comment Policy and Posting
- Suggested Agenda
- It is very important that you return the above documents by the due date because we cannot move forward with assigning site visitors to your site visit

### Screening Lists and Conflicts of Interest Policy

- Program representatives have the opportunity to screen site visitors who may have a conflict of interest
- The program must state, for each person screened, the nature of the conflict
- Please be advised that the Commission automatically screens anyone who works and/or lives in the state the program is located
- Policy includes examples of conflicts

# Screening Lists and Conflicts of Interest Policy, continued

In accordance with Commission policy, the program director should draw a line through anyone who:

- is a graduate of the institution;
- has served on the program's visiting committee within the last seven (7) years;
- has served as an independent consultant, employee or appointee of the institution;
- has a family member who is employed or affiliated with the institution;
- has a close professional or personal relationship with the institution/program or key personnel in the institution/program which would, from the standpoint of a reasonable person, create the appearance of a conflict;
- manifests a partiality that prevents objective consideration of a program for accreditation;
- is a former employee of the institution or program;
- previously applied for a position at the institution within the last five (5) years;
- is affiliated with an institution/program in the same state as the program's primary location;
- is a resident of the state; and/or
- is in the process of considering, interviewing and/or hiring key personnel at the institution.

#### Site Visit Letter #3: Final Communication

- Sent approximately 3 months prior to the site visit
- Final correspondence and forms to Program Director (via e-mail); copies to CEO and CAO:
  - Site Visit Committee Roster
  - Instructions for Site Visitors Evaluating Dental Education Programs
  - Letter to Students/Residents/Fellows from CODA
  - Data Profile (5-year annual survey data)
    - Contains data gathered self-reported by programs through the Annual Survey
  - Electronic Submission of Self-Study Guides –link to CODA website
  - Transportation and Hotel Information Form link provided
  - Privacy and Data Security Reminder link to CODA website

# Consulting: Mock Site Visits

- Active site visitors may independently consult with educational programs accredited by CODA or applying for accreditation
  - All consulting roles <u>must</u> be disclosed to the Commission
  - Site visitors <u>must file a declaration form</u> signed by themselves and the institution/program with whom they consulted
  - Contact the Commission office for the declaration form

# Consulting

 Individuals who provide consultation services do not represent CODA

 If you use a CODA site visitor for consultation services, the program must identify that individual on the screening list and must strike the individual with an explanation

# Silent Observer Opportunity

- Requests for the opportunity to observe a site visit are made through a letter from the chief administrative officer (Dean/chief/chair) of the dental education program.
- Requests should be made, <u>at a minimum</u>, a year in <u>advance</u>.
- While the observer may request to observe a specific site visit, Commission staff will make the final determination based upon the site visit schedule and availability of observation opportunities.
- A program is provided <u>one opportunity to send one</u> <u>observer</u> to a site visit.

# Further Preparation for Site Visit

- Silent Observer Opportunity
  - Available through CODA request process
- Mock Site Visit
  - NOT required by CODA
  - NOT sanctioned by CODA
  - NOT coordinated by CODA



# The Self-Study Process

#### The Self-Study

#### Why conduct a Self-Study?

- Assists in preparation for site visit
- Assesses the effectiveness of the educational program
  - Is program meeting its goals and objectives?
  - Is the program in compliance with Accreditation Standards?
- Identifies strengths and weaknesses of the program
- Self-Study should be used as a tool for program improvement

#### For the Commission and Visiting Committee, the Self-Study Should:

 Provide site visitors with information about the program

 Ensure that the accrediting process is an essential component of program improvement, not just an external review

#### Suggested Timetable for Development of Self-Study

#### Months prior to visit (approximate)

- Program is notified of site visit date. Develop plan for selfstudy process, identify resources
- Prepare rough draft of self-study document. **DO NOT include**Protected Health Information (PHI) or Sensitive Personal

  Information (SPI)
- 5 Draft document is reviewed institution-wide
- 4 Self-study document finalized
- 3 Solicit comments in accordance with the "Policy on Third Party Comments"
- Final self-study document and agenda provided to members of the visiting committee and CODA 60 days prior to visit.

### Instructions for Completing the Self-Study

- Available in Word format. Complete the most current version
- Address all Compliance with Commission Policies sections
- Address all Standards (with response to each question)
- DO NOT include PHI or SPI, student names, or confidential information. <a href="https://coda.ada.org/policies-and-guidelines/hipaa-compliance">https://coda.ada.org/policies-and-guidelines/hipaa-compliance</a>
- Present in the order of the template provided
- State the question and then provide narrative; don't rely entirely on appendices and exhibits
- Use CODA's provided Example Exhibits
- If same information is repeated elsewhere, cross-reference with link
- Include appropriately indexed sections
- Ensure documents are <u>bookmarked</u> and <u>page numbered</u> for easy navigation by the reader

# Self-Study Format and Mechanics

Hyperlink within the document to ease the readers navigation

- Limit documents to:
  - Self-Study Narrative
  - Exhibits\*
  - Appendices\*
  - Curriculum\*

<sup>\*</sup> May be multiple documents, if needed, but must be the fewest number necessary

#### Document should include:

- <u>Title Page</u> include name of program and sponsoring institution; address; telephone number and date of visit
- Verification Page names, titles and signatures of administrators who have reviewed and verified report (CEO, CAO, Program Director)
  - Document is not considered complete if verification page is not included or has no signatures
- <u>Table of Contents</u> should include all sections including verification page and appendices

#### Document Should Include, continued

#### Self-Study Report

- Previous Site Visit Recommendations
- Compliance with Commission Policies
  - Program Changes
  - Third Party Comments
  - Complaints
  - Distance Education
- Program Performance with Respect to Student/Resident Achievement
  - In the self-study, programs are asked to provide a detailed analysis explaining how the program uses student/resident achievement measures to assess the program's overall performance.
  - Also, provide examples of program changes made based on data collected and analyzed.
  - Include information about process and outcomes

#### Document Should Include, continued

# Supporting Documentation (Appendices and Exhibits)

- Should not exceed what is necessary to demonstrate compliance
- Number exhibits sequentially
- Include appendices as appropriate
- Self-Study Guides includes BioSketch templates. Do not send CV or Resume

#### Conclusions & Summary

- List identified strengths and weaknesses
- Describe action plans for any weaknesses

Self-Study document must be page numbered

# The Self-Study Process is NOT:

- Simply a compilation of quantitative or qualitative data.
- Answers to a questionnaire or a check-off sheet.
- A simple narrative description of the program.
- Written exclusively by a consultant or an assigned administrator or faculty member.

### Self-Study Format and Mechanics

- Answer all Policy sections at the beginning of the Self-Study
- Retain all listed Standards and Questions, and answer every question
- Use CODA's provided Example Exhibits
- Consider using different font or font color to draw reader's attention
- Ensure documents are <u>bookmarked</u> and <u>page</u> <u>numbered</u> for easy navigation by the reader

### Reminder About Privacy and Data Security...

- The program's documentation for CODA (self-study, application, or reports to CODA, for example) must NOT contain any sensitive personal information ("Sensitive Information" or "SPI") as outlined in "Privacy and Data Security Requirements for Institutions". Similarly, such documentation must not contain any identifiable patient information ("PHI"); therefore, no "patient identifiers" may be included. This applies whether or not the program is required to comply with HIPAA.
- Before sending documents to CODA, appropriately redact all SPI and all PHI, including all patient identifiers such that the SPI/PHI and patient identifiers 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.

### Reminder About Privacy and Data Security...

- If PHI and/or SPI is found, or if it is inappropriately or inadequately redacted:
  - The institution's CEO, CAO, and HIPAA compliance officer, along with the program director, is notified of the CODA violation
  - The program is asked to send another electronic version of the self-study, minus the PHI or SPI, to the visiting committee and the Commission office
  - Program will be assessed administrative fee of \$4,000

# Assembling the Self-Study

- The Commission requires a complete electronic version of <u>all</u> documents. The Commission must retain a snapshot of the information presented at the time of the submission of the report
  - Consider navigation within the document to links from one area to another, such as manuals, etc.
  - Links must be to areas where content is provided elsewhere in the submitted document, not to external source (like a website)
  - Insert or "embed" all web-based information into the report.
- Review Policy/Guidelines on Electronic Submission of Self-Study

#### Electronic Submission of Self-Study and Reports

- Reports must be saved or scanned as a single document, whenever possible.
  - Submission of single page document electronic file is not acceptable
- Electronic Submission guidelines have been revised to reflect submissions up to 100MB but it is suggested that you stay within the range of 50MB, due to the new electronic management system of the Commission
- Reports exceeding 100 MB must be split and scanned into the least number of documents (For example, a document of 150MB total document size must be split into 2, 75MB documents or 3, 50MB documents)
- Photographs, unless directly related to your report, should not be included (they may be mistaken as PHI/SPI)
- Documents should be positioned so that they do not need to be rotated to view

# Electronic Submission of Self-Study and Reports, continued

- File Formats most typically used:
  - Adobe Portable Document Format (.pdf)
- See CODA Website for:
  - Electronic Submission Guidelines
  - Electronic Portal Access
  - Guidelines for Uploading Documents to Electronic Portal

https://coda.ada.org/policies-and-guidelines/electronicsubmission-guidelines

# Electronic Submission of Self-Study and Reports, continued

- 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 Sensitive Personal
   Information (SPI) are included, you must mark the
   <u>document "fictitious sample."</u> Otherwise, this could be
   identified as a violation of CODA policy (See Privacy and
   Data Security reminder at the end of the Guidelines
   document).

# Electronic Submission of Self-Study and Reports, continued

- Do not include marketing brochures/documents, case studies, presentation materials, or examinations that include information which may be identified as PHI or SPI (e.g., patient photos) even if the appropriate authorization or consent from the patient/person to release the information has been obtained.
  - Even with consent, this could be considered a violation of CODA policy.
- Photographs, unless directly related to your submission, should not be included. Further, photographs which require a photo wizard for viewing <u>must not</u> be included. Photos of patients must not be included.
- Do not submit any information that includes <u>dates</u>, which may be associated with a patient. These may be considered a violation of CODA policy.

# Electronic Submission of Self-Study

- Document uploads (self-study, exhibits, appendices and curriculum) must be reduced to the fewest number of documents possible (document size up to 100MB may be uploaded)
- Ensure documents are bookmarked and page numbered for easy navigation by the reader
- Clearly name documents for easy identification and include submission date in the name (for example – Self Study Narrative 10.4.24)
- Please ensure all documents comply with CODA Privacy and Data Security Requirements for Institutions

#### CODA E-Portal and Site Visit Process

- Program Access:
  - One (1) login for program director only
    - Do not share login information
- Site Visitor Access:
  - Login and password credential provided to access site visit or application review assignments and related program materials
- All materials confidential; do not share login or passwords

# Submitting Self-Study to CODA Electronic Accreditation Portal

- Submission of Self-Study and site visit schedule (60 days before site visit; portal open just prior to due date)
- Notify appropriate CODA manager and site visit team once the upload is complete
- Do not place the self-study in any portal link other than the one labeled "Self-Study". If this portal is closed, contact CODA staff to open it
- If necessary (and only when requested), on-site documents loaded to the portal should be named as follows: "On Site\_Description\_Date"
- Do not click "Complete Application," so that the portal remains open for you through the site visit

Online Portal Access: https://coda.ada.org/portal

## Self-Study Submission Process

- To the CODA Office submitted via the E-portal.
  - Follow Guidelines for Electronic Submission for format and file size
- To the Site Visitors will access via the E-portal.
- To the State Board Representative: submit only a comprehensive electronic copy of the Self-Study (narrative plus exhibits, appendices, support documents, etc.). CODA suggests encrypted transmission.
- To Observers (Silent Observers): submit only a comprehensive electronic copy of the Self-Study (narrative plus exhibits, appendices, support documents, etc.). CODA suggests encrypted transmission.

### Preparing and Assembling the Self-Study-Recap

- The self-study must be clear and concise. Include only what is necessary to demonstrate compliance
- Make sure you are using the <u>current</u> Standards and Self-Study when completing the self-study
  - Be sure you are using the standards and self-study that will be in effect on the date of your site visit
- When assembling the self-study, double check (and even triple-check) to make sure no unwanted documentation, especially documentation that may contain PHI or SPI has been included

# Preparing and Assembling the Self-Study-Recap

- Commission requires a complete electronic version of all documents
  - Consider navigation within the document to links from one area to another, such as manuals, etc.
  - Links must be to areas where content is provided elsewhere in the submitted document, not to external source (like a website)
- Upload to CODA E-Accreditation Portal at least 60 days prior to the site visit. Notify site visit team and staff once upload is complete.
- Review Policy/Guidelines on Electronic Submission of Self-Study

### Redaction

- Redaction. When removing any Sensitive Information or Patient Identifier from paper or electronic documents disclosed to CODA, programs/institutions shall <u>fully and</u> <u>appropriately</u> remove the data such that the data cannot be read or otherwise reconstructed. <u>Covering data with ink is not</u> <u>an appropriate means of removing data from a hard copy</u> <u>document and may sometimes be viewable when such</u> <u>documents are scanned to an electronic format</u>.
- If a document includes fictitious information, which may otherwise appear to be Sensitive Information or Patient Identifiers, the program must clearly mark the document as "Fictitious Example".

### Reminders

- Review...Review (by multiple people)
- Ensure you use the CODA Biosketch, never submit a curriculum vitae or resume
- Use blank templates, not completed forms, as examples for CODA
- Review <u>all</u> PowerPoints, slides, radiographs in your submission
- Look for names and initials of potential patients

### Reminders

- Look at dates (any dates) that may be associated with a patient
- Review photos, particularly if they are clinic photos that may be considered a patient photo

# Recent changes to CODA Privacy and Data Security Policy

 CODA will no longer perform a page-by-page review of materials submitted by an educational program to the Commission and/or its workforce members.

 If the Commission becomes aware that SPI/PHI is identified (at any time in the future), the program will be assessed an administrative fee by the Commission. Each subsequent finding would be imposed an additional administrative fee.



# Conduct of the Site Visit

# Site Visit Team (a.k.a. Visiting Committee)

 Only the individuals <u>on the roster</u> provided to you by CODA are permitted to participate (and have signed confidentiality agreements)

- Site visitors will not sign any agreements provided by the program or its off-campus sites prior to the visit or on site
  - If a site will require completion of an agreement, CODA staff must be informed at least 90 days prior to the site visit, to discuss this with the program.

# Composition of the Visiting Committee

Committee may include the following members...

- Discipline-specific site visitor(s)
- State board representative (if invited by the program)
- Silent observer (if requested by CODA)
- CODA Staff (if on the visit)
- Check final roster (Letter #3) for site visit attendees
- All observers must sign confidentiality agreements prior to obtaining site visit materials

# Responsibilities of the Site Visit Chair

- Serve as liaison between the team and program
- Review site visit schedule with team and program to ensure it complies with CODA template
- Request information before and during the visit on the site visit team's behalf

# Single discipline site visit

Single discipline program visit:

- Two discipline-specific site visitors (one serves as Chair) and other attendees as noted on roster
- 1-day visit (8:00 a.m. 5:15 p.m.)
- Can be extended if multiple sites to visit

# Multi-discipline site visit

- Multi-discipline site visit:
  - Always at least 1.5 days
  - One discipline-specific site visitor per discipline
  - OMS always two site visitors
  - Other attendees as noted on roster
  - CODA staff member attends
  - If the program is scheduled as part of a comprehensive dental school visit, please refer to the schedule for comprehensive dental school visits

# State Board Representative

- The state board member participates in an accreditation site visit in order to develop a better understanding of the accreditation site visit process and its role in ensuring the competence of graduates for the protection of the public.
- The state board member is expected to be in attendance for the entire site visit, including all scheduled conferences and during executive sessions of the visiting committee. While on site the state board member:
  - provides assistance in interpreting the state's dental practice act and/or provides background on other issues related to dental practice and licensure within the state
  - serves as a silent observer in all sessions except executive sessions with the site visit team. (Recent policy revision)
  - is a member of the site visit team. However, if a vote is required for a recommendation, only the CODA members will vote

# Silent Observation Opportunity

- Request should be made at <u>a minimum</u> one (1) year in advance.
- Opportunities granted on first come first serve, pending approval of program to be observed.
- Formal written request is made by CAO.
- One institutional representative may request to observe a site visit in the discipline to be assessed.
- Expenses paid by your own institution.
- Scheduling arranged by CODA staff.
- One observer allowed per site visit.

### Silent Observer

- Observer receives all self-study materials and is permitted to observe all interviews and meetings
- The observer must remain silent during all sessions where university and/or program officials, faculty, staff or students are present at the site visit
- The observer is encouraged to ask questions of the visiting committee during executive session meetings, only, but does not participate in decision-making discussions
- As an observer of the site visit, it is expected that this individual will remain with the designated site visit team members at all times during the visit

# Meeting Rooms

- Single program visit:
  - One main (private) meeting room
- Multiple program visit:
  - One main (private) meeting room for team executive sessions and group interviews
  - One smaller (private) room for each discipline

# Computer Support

### Helpful to have but not required.....

- One IBM-compatible computer (with Microsoft Word) available for use during the visit
- Access to a printer

Access to a secure shredder or shredding bin

### Site Visit Schedule

- Must adhere to CODA's template (if you will modify any portion you must inform CODA staff)
- Do not reduce times or delete sessions
- Submit the Schedule and Self-Study in the CODA Electronic Portal 60 days prior to the site visit
- Be prepared to add visitations to educational activity sites and/or inclusion of faculty in interviews
- Do not plan evening or social activities for the site visitors

# The Agenda Includes ...

- Opening interviews with Administration and Director
- Tour of facilities
- Review of program documentation
- Interviews with faculty

- Interviews with <u>all</u> students/residents/fellows
- Interviews with faculty at affiliated sites (if applicable)
- Final conference with Administration and Director

# Visiting Sites Where Educational Activity Occurs

- Site visit team will identify the sites to be visited based upon educational experiences at the site (for example based upon length of training at the site, educational experience or evaluation/competencies achieved).
- Program to add visit to schedule for visit to site (physical or virtual visit or interviews)
- Extend length of visit when needed; notify CODA staff for assistance

# Tips for Site Visit Schedule – ADVANCED (as part of a dental school visit)

- Facilitator for conducting the Basic Sciences meeting (Morning of Day 1)
- Program Director/Administrators <u>not</u> included in faculty interviews
- All students/residents/fellows expected for interview
- Dean expected to deliver an opening statement on institutional support of advanced dental education programs when meeting with site visitors (Afternoon of Day 1)



# On-Site Document Review and Interviews

### On-site Review/Verification

- All items noted in the Self-Study as "on-site" must be available upon the site visitors' arrival to the program's facility
- On-site materials should be provided in paper form during the site visit
- Do not provide site visitors with login credentials into the program's electronic systems

# On-site Review/Verification, continued

- Must be organized and placed in conference room for each discipline (in addition to SSG)
  - Off-campus sites written agreements
  - Departmental statistical records
  - Records of each student/resident/fellow clinical activity
  - Evaluations: Teaching staff and student/resident
  - Outpatient/Inpatient records

### Breakfast/Lunch and Executive Sessions

- Light breakfast and lunch is appreciated.
- 1 Day Visit: lunch may be an executive session, or may include program faculty without director/administration (often used as an executive session); check with site visit team
- 1 ½ Day Visit:
  - Day 1 lunch same as above
  - Day 2 exit at 12:15 p.m. for multi-discipline visit;
     12:00 p.m. for comprehensive dental school visit

# Interviews: Program Director and Faculty

#### Program Director:

- The program director interview is a one-on-one session with the site visitor(s) and program director
- Program director-please be sure you are available to site visit team as needed throughout the visit

### Faculty:

- Participate in applicable curriculum conferences
- Program Director and Chair/other leadership <u>must not</u> participate in faculty interviews

NOTE: Confidentiality is stressed in all conferences

### Interviews: Students/Residents/Fellows

- Visiting committee will meet with all students/residents/fellows as a group and/or individually
  - However, interns/others types of students not part of <u>accredited</u> program must <u>not</u> be interviewed or reviewed as part of site visit
- Separate conferences are scheduled for the students/residents/fellows of each discipline
- Faculty and program director <u>must not</u> participate in student/resident/fellow interviews
- NOTE: Confidentiality is stressed in all conferences

# Final conference(s)\*

- Visiting committee exits with program director first (may include other individuals as the institution desires)
- Committee conducts exit interview with administration
  - may include program director, CAO, and other individuals as the institution desires)
  - must include the CEO or his/her designee
    - \*Program may request to combine conferences

### The Final Conference

- The team will present its findings at the final conferences in a verbal report
- Again, the CEO or his/her designee must be present
- May include recommendations or suggestions
  - Program can begin addressing any recommendations before receiving preliminary draft site visit report
  - Suggestions need not be addressed
- The Commission grants the accreditation status

### After the Final Conference

- Commission Staff is the Contact
  - Please do not contact the site visit team following the visit.
- Preliminary Draft Site Visit Report
- Institutional Response
- Commission Review Process
- Transmittal of CODA Actions



# After the Site Visit

### Feedback after the visit

- Post-Site Visit Survey
- E-mailed to program director and CAO (confidential)
- CODA requests feedback on site visit logistics and Commission materials
- CODA requests feedback on site visit team

### After the site visit...

- Preliminary Site Visit Report
  - Receipt approximately 6 weeks following the visit
  - Sent to the President/medical center director
  - Cc: CAO (Chief/Dean/Chair), Program Directors
- Program has 30 days to review and respond to:
  - Factual inaccuracies
  - Differences in perception
  - Begin to address recommendations, if applicable
- Deadline for Response to the Report: June 1 or December 1
  - Progress made in implementing recommendations
  - Suggestions do not require responses

### Response to Preliminary Draft Site Visit Report

- A recommendation is made when the program does not comply with a standard. The program must report progress in achieving compliance
- A suggestion is made when a program complies with the standard, but an area could be enhanced. The program is not obligated to respond
- If <u>no</u> recommendations as a result of the site visit, program may:
  - Note differences in perception
  - Correct factual inaccuracies
    - Narrative
    - Statistical or summary data

# Response to Preliminary Draft Site Visit Report

- The program can begin work immediately on any identified areas of non-compliance
- Can submit evidence to show compliance
- Will be reviewed by Commission before making accreditation decision
- Deadline for submission of site visit response will be noted in the letter accompanying the preliminary draft site visit report

### **Accreditation Decisions**

- The Commission makes accreditation decisions
  - Site visits conducted May 1 through October 31 considered at CODA Jan-Feb/Winter meeting
  - Site visits conducted November 1 through April 30 considered at CODA July-Aug/Summer meeting

- 30 days following CODA meeting CEO receives letter and final report with accreditation status (strict deadline)
  - Dean and program directors copied on the letter

#### The Letter of Transmittal

- Program director, CAO and CEO will receive the transmittal letter within 30 days of the Commission's meeting
- Protocol
- Action/Date of Next Site Visit
- Authorized Enrollment
- Follow-up
  - Progress Report
  - Site Visit
  - Documentation Requested for Area(s) of Deficiency

#### **Accreditation Decisions**

- If program is awarded "approval with reporting requirements" a progress report will be required in approximately 6 months
  - Programs that are 2 or more years in length have a timeframe not to exceed 2 years to satisfy recommendations
  - Programs that are 1 2 years in length have a timeframe not to exceed
     18 months to satisfy recommendations
  - Note: If there are outstanding recommendations and the Standard has changed/revised, the institution will be held to the new standard
- If program is awarded "approval without reporting requirements" no additional information is required



# Policy and Procedure Reminders and Revisions

#### Commission Policies and Procedures

#### Policies and Procedures

- Evaluation and Operational Policies and Procedures Manual (EOPP), including
  - Reporting Program Changes
  - Educational Activity Sites
  - Enrollment Increase
  - Distance Education
  - Complaint Policy
  - Others

https://coda.ada.org/policies-and-guidelines

## Evaluation and Operational Policies and Procedures (EOPP)

- Evaluation and Operational Policies and Procedures (EOPP)
  - Redline copy of changes posted after each CODA meeting (Winter and Summer)

 EOPP is the Program Director's resource to CODA Policy and Procedures

## Guidelines for Reporting to CODA

https://coda.ada.org/policies-and-guidelines/program-changes-deadlines-and-other-report-guidelines

Guidelines must be used for reports to CODA; where specialized guidelines exist, they must be used and all components addressed.

Reporting Program Change	Interruption of Education
Use of Distance Education	Use of Sites Where Educational Activity Occurs
Enrollment Increases	Preparation of Reports (response to site visit and progress reports)
Transfer of Sponsorship	Teach-Out
Biosketch Template (including Allied Biosketch template)	Administrator Verification Page

## Program Changes

- All program changes that <u>could affect the ability</u> of the program to comply with the Accreditation <u>Standards</u> must be reported to the Commission.
- Review Guidelines to determine if reporting is required.

## Program Changes

- Changes to institutional accreditor or pending adverse actions must be reported
- Distance Education\* use must be reported (temporary or permanent use)
- Interruption of Education\*

\*Guidelines for Reporting are available

Remember – you must document compliance during the site visit, even though CODA may have previously acknowledged a program change

- Distance Education
  - Distance education means education that uses one or more of the technologies to deliver instruction to students/residents/fellows who are separated from the instructor or instructors and to support regular and substantive interaction between the students/residents/fellows and the instructor or instructors, either synchronously or asynchronously.
  - Review Policy and Guidelines for details

- Educational Activity Sites
  - Minor Sites required to complete an experience at this or another site to meet a program requirement or accreditation standards; No competency (or summative) assessments.
  - Major Sites required to complete an experience at this site to meet a program requirement or accreditation standards; Competency assessments (or summative) assessments are performed.
- Review Policy and Guidelines for details

#### **Requesting Increases in Enrollment**

- Please see the appropriate enrollment increase policies in EOPP relative to your discipline
- Discipline-specific guidelines for requesting enrollment increase are available on the CODA web site
  - Advanced Dental Education Guidelines (not authorized enrollment)
  - Advanced Dental Education programs are authorized for a base number enrollment. See Enrollment Policy.
- If any program wants to modify enrollment, prior approval is required.
- Programs are reminded that resources must be maintained even when the full complement of students/residents/fellows is not enrolled in the program.

#### **Recently Revised Policy**

- Policy on Enrollment Increases in Advanced Dental Education Programs
  - Permits the Review Committee Chair to review and approve temporary, one-time only increases in enrollment of up to a maximum of six (6) months, if the program provides evidence of sufficient resources to support the temporary increase

- Changes in program leadership (CEO, CAO, Program Director) must be reported
  - This includes interim and permanent changes in any leadership position
  - An individual must be named at all times in the CEO, CAO and Program Director roles
  - Biosketch must be submitted for Program Director only

Note: Reporting timeline is 30 days prior to change, unless unexpected in which case reporting must be no later than 30 days after change.

- Non-Enrollment of First Year Students/Residents/Fellows
  - A program <u>must</u> maintain all resources for full complement even when enrollment is reduced or in non-enrollment
  - Program must maintain compliance with all Standards during period of non-enrollment
- Interruption of Education
  - An interruption that requires a modification of the program, the curriculum, or takes faculty, administrators or students away from the program...

- Due Dates for Submission of Program Reports\* to CODA
  - All reports to CODA (e.g. program change, enrollment increase, educational activity sites, etc.) must be submitted by May 1 or November 1 if going to be reviewed at a CODA meeting.
  - Reports that may not require CODA formal review must be submitted 30 days prior to the change.
  - Unexpected changes must be submitted no later than 30 days following the change.

\*Review Guidelines

- Confidentiality Policy
  - Noting that the CEO, CAO/Dean/Academic
     Dean, and Program Director are the only points of contact with whom CODA staff will communicate.
- Progress Reports
  - Identification of new deficiencies during the reporting time period will not result in a modification of the specified deadline for compliance with prior deficiencies.

## Reminder About Privacy and Data Security...

- The program's documentation for CODA (self-study, application, or reports to CODA, for example) must NOT contain any sensitive personally identifiable information ("Sensitive Personal Information" or "SPI") as outlined in "Privacy and Data Security Requirements for Institutions". Similarly, such documentation must not contain any identifiable Protected Health Information ("PHI"); therefore, no "patient identifiers" may be included. This applies whether or not the program is required to comply with HIPAA.
- Before sending documents to CODA, appropriately redact all SPI and all PHI, including all patient identifiers such that the SPI/PHI and patient identifiers 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.

## Reminder About Privacy and Data Security...

- If PHI and/or SPI is found, or if it is inappropriately or inadequately redacted:
  - The institution's CEO, CAO, and HIPAA compliance officer, along with the program director, is notified of the CODA violation
  - The program is asked to send another electronic version of the self-study or report, minus the PHI or SPI
  - Program will be assessed administrative fee of \$4,000

Note: The most frequent finding of potential PHI relates to dates that may be associated with a patient. Remove all dates from your documents.

## Expectations Related to Privacy & Data Security

- In accordance with the Business Associate Agreement (BAA) between CODA and your institution, the following is expected:
  - SPI and PHI will <u>only be viewed on-site (in the program's facility)</u>, and only to the extent necessary to conduct the work of CODA
- Signed Verification Page:
  - Serves as an attestation that the report/selfstudy/document submitted to CODA contains no prohibited Sensitive Personal Information (SPI) or Protected Health Information (PHI)



## What's New at CODA

## 2024 CODA Actions of Interest (Fees)

#### **CODA Program Fees:**

https://coda.ada.org/site-visitor-resources/coda-fee-schedule

#### Annual fees and application fees:

- 2024, 0% increase in annual fees
- 2025, 2% increase in annual fees
- Annual administrative fund fee:
  - 2024, waived
  - 2025, waived
- During the year a program is due for a regular accreditation site visit, the annual fee will be doubled.

Note – 2024 fees were distributed mid-March and are due by mid-April.

## CODA Actions of Interest (Standing Committees)

#### Finance

- Study CODA's revenue and expense planning model and assist with long-term projection modeling to obtain a revenue-neutral budget
- Discussion with ADA-CODA Relationship Workgroup
  - Determine a mechanism to replenish CODA's Administrative Fund annually based upon CODA's revenue after total expenses are paid.
  - Negotiate next ADA-CODA Shared Services Agreement

## CODA Actions of Interest (Standing Committees)

- Quality Assurance and Strategic Planning
  - Obtain information on recent changes to Pell Grant and Title IV funding, and the impact on CODA-accredited allied dental education programs
- Communication and Technology
  - Adopted the 2024-2028 CODA Communication Plan and Strategy, and Executive Summary Report

## CODA Actions of Interest (Standing Committees)

Documentation and Policy Review

- Revisions to Evaluation and Operational Policies and Procedures Manual
- https://coda.ada.org/policies-and-guidelines

## CODA Actions of Interest (Ad Hoc Committees)

- Ad Hoc Committee on Professional Development and Mega Issues
  - Directed that the Ad Hoc Committee coordinate a Summer 2024
     Mega Issue discussion on "Artificial Intelligence and Dental Education.
- Ad Hoc Committee established to investigate in-person, on-site work expectations for program directors to determine if changes are needed in the discipline-specific Accreditation Standards for dental education, advanced dental education, and allied dental education programs.
- Ad Hoc Committee composed of all Commissioners who chair the discipline-specific Review Committees in dental, allied dental, and advanced dental education, and additional CODA Commissioners, to study the Accreditation Standards for possible revision related to the letter from The National Coalition of Dentists for Health Equity.

## CODA Actions of Interest (Orthodontics)

- Ad Hoc Committee composed of members of the Orthodontics and Dentofacial Orthopedics Review Committee and nominees from the American Association of Orthodontists to review Standards 2-9 and 2-10 of the Accreditation Standards for Advanced Dental Education Programs in Orthodontics and Dentofacial Orthopedics.
- Communication to the American Association of Orthodontists to request nominations of individuals who may serve on the Ad Hoc Committee to review Standards 2-9 and 2-10, from which the Commission will appoint two (2) to three (3) individuals.
- Communication to the American Association of Orthodontists, Council on Education (COE), and Society of Educators (SOE) to request feedback for consideration by the CODA Ad Hoc Committee, including information on this topic from orthodontics and dentofacial orthopedics education programs.

## CODA Actions of Interest (Pediatric Dentistry)

 Direct Pediatric Dentistry Review Committee to reconsider patient age categories and the number of required experiences in patient age categories, related to the anesthesia requirements within the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry.

## CODA Actions of Interest (Oral Medicine)

 Communication to the Commission on Dental Accreditation of Canada for an update on the identification of representatives to serve on the ad hoc committee and CDAC's continued interest in reviewing and potentially extending reciprocity to oral medicine education programs.

## CODA Actions of Interest (Orofacial Pain)

 Review Committee on Orofacial Pain Education to meet prior to the Summer 2024 meetings for further discussion and consideration of possible revision to the Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain, particularly related to the baseline competencies for the discipline



# New and Proposed Accreditation Standards

## Why Stay Informed on Standards Revisions?

- It is the program's obligation to stay up-to-date on the Standards for compliance.
- A program's compliance is evaluated with the current Accreditation Standards ("must" statements) that have been adopted and implemented.
- Programs may need to modify the self-study if standards have been implemented during the self-study development process.
- Identification of new deficiencies during the reporting time period will not result in a modification (extension) of the specified deadline for compliance with prior deficiencies.

## How to Stay Informed on Standards Revisions

- CODA helps you stay current by emailing you notifications [e.g., "CODA Communicator," "CODA Alert," emails to a specific set(s) of program directors, communities of interest]
  - Note that "opt out" will not receive CODA communications
- CODA conducts workshops and posts materials to its website

Please access the CODA website periodically

## Past and Future Validity and Reliability Studies of the Standards

#### **Spring 2021** (delayed from 2020)

- Predoctoral Dental Education
- Oral and Maxillofacial Pathology

#### Spring 2021

Dental Anesthesiology

#### Spring 2022

- Prosthodontics
- Orofacial Pain
- AEGD
- GPR
- Dental Public Health

#### 2024

- Dental Assisting
- Oral Medicine
- Oral and Maxillofacial Radiology

#### 2025

- Dental Therapy
- Oral and Maxillofacial Surgery
   Clinical Fellowship

#### Revised Standards

#### January 1, 2023 implementation

- Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics (V&R)
- Periodontics (V&R)

#### July 1, 2023 implementation

- Accreditation Standards for Advanced Dental Education Programs in Dental Public Health
- Accreditation Standards for Advanced Dental Education Programs in Dental Anesthesiology

#### Revised Standards

#### August 11, 2023 implementation

 Accreditation Standards for Dental Assisting Education Programs (Standards 2-7 and 3-6)

#### July 1, 2024 implementation

- Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology (new Standard 4-16)
- Accreditation Standards for Advanced Dental Education
   Programs in Orofacial Pain (new Standard 2-10)
- Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain (V&R)

#### Revised Standards

- January 1, 2025 implementation
  - Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (revised anesthesia standards)
- July 1, 2025 implementation
  - Accreditation Standards for Advanced Dental
     Education Programs in Dental Public Health (V&R)

## Proposed Standards: Comments Due

https://coda.ada.org/accreditation/open-hearings-comments-due

#### Comment Due June 1, 2024:

- <u>All</u> Advanced Dental Education Discipline Standards (related to program sponsor and authority to operate)
- Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Surgery (Residency) (related to various standards)

## Proposed Standards: Comments Due

https://coda.ada.org/accreditation/open-hearingscomments-due

# Comment Due June 1, 2024 (as directed at CODA's Winter 2024 meeting):

- Accreditation Standards for Advanced Dental Education
   Programs in Advanced Education in General Dentistry (related to the optional second year for residency programs)
- Accreditation Standards for Advanced Dental Education Programs in General Practice Residency (related to the optional second year for residency programs)
- Accreditation Standards for Advanced Dental Education Programs in Endodontics (related to program director full-time status)

## Proposed Standards: Comment Portal

Written comments will only be received through the CODA electronic comment portal.

Each Standards revision has its own unique comment portal.

https://coda.ada.org/accreditation/open-hearings-comments-due

#### A Reminder on the Structure of Standards

- The MUST statement is the requirement and mandatory for compliance.
- The SHOULD statement is a method to achieve the "must" but not mandatory.
- The INTENT statement provides clarification on the requirement; the reason and purpose, not exclusive or exhaustive.
- The EXAMPLES OF EVIDENCE are ways to document compliance, may include these items or other methods of documentation.

#### If in Doubt on Current Standards or Policies:

Check the CODA website

https://coda.ada.org/standards

Contact CODA staff

https://coda.ada.org/about-coda/coda-staff



# Communicating with the Commission Office

#### Points of Contact

- The program director is responsible for the program and is considered CODA's primary contact.
- If anyone other than the program director, CAO or CEO (e.g., coordinators or other faculty members or department chairs) contacts CODA for purposes of interpretation of policy, interpretation of Standards, reporting program changes, guidance on completing documents, etc., please be aware that CODA staff will not discuss program activities unless the program director is also involved in the discussion.
- CODA will communicate only with the program director, chief administrative officer and chief executive officer regarding confidential accreditation matters per policy. It is the responsibility of the program/institution to share information with others within the institution it deems necessary.

#### E-mails to the Commission Office

- Sometimes we receive emails from individuals using "secure" email systems where the recipient is asked to log into that system and create a password.
- Or, auto replies are sent to CODA requesting staff to register to be added to a list of approved senders to control spam.
- CODA staff is prohibited from opening links to third-party document repository sites and/or email systems.

## **Contact Information Changes**

- Please be sure to let CODA know when there are changes in program leadership (program director, CAO, or CEO).
- According to Commission Policy these changes must be reported within 30 days of the change.
- In addition, please be sure to contact CODA if your contact information changes (e-mail address).
- Please provide us your address at your sponsoring institution as your business address for CODA's record.
- This is especially important to ensure delivery of the Annual Survey and other important information.
- If you are also a site visitor, we really need to know this immediately
  as it can affect where you are able to serve as a site visitor.



# Online Resources and Staff Contacts

## **Program Director 101**

- April 11, 2024
- 3:00 5:00 pm Central
- By invitation to program directors.
- Registration required via link sent to all program directors

 Slides will be posted to CODA's website following the webinar

## Upcoming Session – Save the Date

- Site Visitor Update
  - -April 15, 2024
    - Predoctoral and Dental Therapy, 9-11am
    - Allied, 12-2pm
    - Advanced, 3-5pm

### "Site Visit Orientation" Website

## https://coda.ada.org/sitevisits/advanced-dental-site-visits

- Provides narrative information on site visit process
- Site visit related documents are downloadable

#### Site Visit information: What's Included?

#### The Site Visit Process

- Prep for Advanced Dental Site Visit
- Before Your Advanced Site Visit
- During Your Advanced Site Visit
- After Your Advanced Site Visit
- Advanced Site Visit Documents
   <a href="https://coda.ada.org/site-visits/advanced-dental-site-visits/advanced-dental-education-site-visit-documents">https://coda.ada.org/site-visits/advanced-dental-education-dental-site-visits/advanced-dental-education-site-visit-documents</a>
- Upcoming Advanced Site Visits

#### Site Visit information: What's Included?

#### Information about the site visit

- Before the visit
- During the visit
- After the visit

#### Documents

- Standards
- Self-study guide
- Site Visitor Evaluation report (SVER)
- Frequency of citings
- Materials to be available onsite
- https://coda.ada.org/site-visits/advanced-dentalsite-visits/advanced-dental-education-site-visitdocuments

#### Commission Policies and Procedures

- Policies and Procedures
  - Evaluation and Operational Policies and Procedures Manual (EOPP), including
    - Complaint Policy
    - Policy and Guidelines for reporting a program change, off-campus sites, enrollment, distance education, etc.

https://coda.ada.org/policies-and-guidelines

#### **CODA Website Resources**

#### About CODA

https://coda.ada.org/about-coda

#### **Standards**

https://coda.ada.org/standards

Policy and Guidelines

https://coda.ada.org/policies-and-guidelines

The Site Visit Process and Related Documents

https://coda.ada.org/site-visits

## CODA Website - Accreditation Updates

#### **Meeting Dates**

https://coda.ada.org/accreditation/meeting-materials

Reports of Major Actions and Minutes of past meetings

https://coda.ada.org/accreditation/post-meeting-actions

#### Hearing information

 https://coda.ada.org/accreditation/open-hearingscomments-due

Site Visit Schedules (U.S. and International)

 https://coda.ada.org/site-visitor-resources/site-visitschedule

#### Other CODA Communications

- CODA Communicator E-Newsletter <a href="https://coda.ada.org/accreditation">https://coda.ada.org/accreditation</a>
  - Distributed twice per year, following each Commission meeting
- Commission Alert Emails
  - Hearings
  - Review Committee Openings
  - Nominations for Site Visitors



## Volunteering with CODA

## Why Volunteer with CODA?

 Helps you stay informed on latest activities, policies and standards.

 May fulfill requirements for promotion and tenure.

Give back to the profession.

#### Call for Nominations: Review Committees

 CODA seeks nominations for various positions on Review Committees.

Nomination Deadline is June 1, 2024

 List of Positions, Nomination Criteria, and Nomination Form found at <a href="https://coda.ada.org/accreditation/call-for-nominations">https://coda.ada.org/accreditation/call-for-nominations</a>

#### Call for Nominations: CODA Site Visitors

- CODA seeks nominations for site visitors.
- Nomination Deadline is December 1, 2024
- Greatest need in:
  - Oral Medicine
  - Oral and Maxillofacial Radiology
  - Prosthodontics and Maxillofacial Prosthetics
  - Oral and Maxillofacial Surgery Clinical Fellowships Cosmetic

- Oral and Maxillofacial Pathology
- Dental Public Health
- Oral and Maxillofacial Surgery Clinical Fellowships Oncology
- Clinical Fellowship in Craniofacial and Special Care Orthodontics
- Nomination Criteria, and Nomination Form found at <a href="https://coda.ada.org/accreditation/call-for-nominations">https://coda.ada.org/accreditation/call-for-nominations</a>

### Ongoing Appointment: CODA Site Visitors

- Remember, annual paperwork and mandatory annual training/retraining are required to maintain active status.
  - Annual training/retraining required

 Please reply to CODA staff emails in a timely fashion (by the deadline).

#### To contact CODA staff

Staff contacts are found on CODA's website:

https://coda.ada.org/about-coda/coda-staff

Please contact staff by email and phone.

CODA conducts all business electronically. Therefore, we ask that you not send postal mail to the Commission office.

#### **Commission on Dental Accreditation**

211 E. Chicago Ave., Chicago IL 60611

## Questions?

# Thank you