CONSIDERATION OF CODA’S ONGOING OPERATIONS IN RESPONSE TO THE COVID-19 IMPACT ON DENTAL AND DENTAL RELATED EDUCATIONAL PROGRAMS

Background: At its April 2, 2020 meeting, the Commission on Dental Accreditation adopted, with immediate implementation, several actions related to the conduct of accreditation site visits to CODA-accredited programs and programs seeking accreditation through the application process. As a result, all CODA site visits were postponed March 2020 through year-end 2020.

Additionally, at its April 13, 2020 meeting, the Commission adopted, with immediate implementation, temporary flexibility guidance documents for each discipline under the Commission’s purview, related to the Class of 2020, as a result of the impact of COVID-19 on dental and dental related educational programs. Subsequently, the temporary flexibility guidance documents were circulated to all CODA-accredited educational programs to be used as a resource for reporting an interruption of education resulting from COVID-19 for the Class of 2020. Programs’ interruption of education reports for the Class of 2020 were reviewed during special meetings of the Commission’s Review Committees and CODA in June and July 2020.

At the same meeting, on April 13, 2020, the Commission directed a modified timeline of several of CODA’s ongoing operations as a result of the impact of COVID-19 on dental and dental related educational programs. The Commission’s prior directives related to the impact of COVID-19 are found in the Meeting Minutes, April 2, 2020 and April 13, 2020, which are available as separate reports of the Summer 2020 CODA meeting.

At this meeting, the Commission on Dental Accreditation should consider a number of ongoing Commission initiatives, which may require further modification due to the continued impact of the COVID-19 pandemic.

Consideration of Flexibility in the Accreditation Standards Related to Interruption of Education for All Commission-Accredited Dental and Dental Related Education Programs for the Class of 2021 and Beyond: The Commission may want to consider the following issues:

1. Flexibility guidance for the Class 2021 and beyond: The Commission may wish to consider whether existing guidance should be extended or new guidance issued. If the current guidance is extended, a timeline for extension may be appropriate. If new guidance is issued, the Commission may consider how the guidance will be developed, approved, distributed and its timeline for application.

2. Monitoring of educational programs for the Class of 2021 and beyond: The Commission may wish to discuss appropriate monitoring mechanisms, either through interruption of education reports, other reports, or the Commission’s annual accreditation survey.

3. Ongoing, temporary use of distance education: The Commission may wish to discuss the extension of its temporary flexibility to allow use of distance education for all years of the program during COVID-19. In consideration of this topic, the Commission may note
the United States Department of Education extension to allow temporary use by educational programs through December 31, 2020.

4. Potential for overlap in student/resident/fellow enrollment: The Commission may wish to consider management of overlap of student enrollment, on a temporary basis, for programs that make such a request related to COVID-19.

**Consideration of CODA’s Ongoing Operations in Response to the COVID-19 Impact on Dental and Dental Related Educational Programs:** The Commission may want to consider the following issues:

5. Whether timelines for CODA activities, as directed during the April 13, 2020 meeting, should be reaffirmed or reconsidered at this meeting:
   a. Spring 2020 Validity and Reliability Studies for predoctoral dental education and oral and maxillofacial pathology education will be delayed until Spring 2021.
   b. Ad Hoc Committees to consider standards revisions for Oral and Maxillofacial Surgery (residency and fellowship), Orthodontics and Dentofacial Orthopedics (residency and fellowship), and Periodontics, respectively, will submit update reports in Winter 2021 rather than Summer 2020.
   c. Ad Hoc Committee on CODA Structure and Function will continue its work, with a report in Winter 2021 rather than Summer 2020.
   d. Ad Hoc Committee on Use of Educational Activity Sites will continue its work, with a report in Winter 2021 rather than Summer 2020. The mandatory survey of all dental education programs on the use of educational activity sites has been delayed during the COVID-19 interruption. The Summer 2020 Mega Issue Discussion on use of educational activity sites was canceled.

6. How to manage other program changes related to COVID-19 and potential need for additional Review Committee and Commission Meetings (e.g. non-enrollment, extended enrollments, program changes, interruption for Class of 2021, etc.).

7. How to manage flagged Annual Survey responses in accordance with CODA’s continuous monitoring mechanism, when reported information may be reflective of flexibility that was granted by the Commission but would otherwise have resulted in CODA staff follow-up.

8. How to manage receipt of applications in the Commission office. During the April 13, 2020 meeting, the Commission noted that applications are sent in multiple volumes and copies, both paper and electronic, so that staff may distribute the application to the reviewer(s) at the appropriate time in CODA’s application review process. Since the CODA office was closed, and since the priorities of CODA and its volunteers were focused on COVID-19, the Commission determined that it would delay further processing of applications during the COVID-19 interruption. Absent COVID-19 restrictions and delays, the first opportunity for the Commission to consider a program, provided the application is in order, is generally 12 to 18 months following the application submission date. The Commission should determine how it will proceed with processing applications given the potential long-term impact of COVID-19.
9. How Hearings on Accreditation Standards and CODA Meetings will occur through 2020 and 2021. The Commission conducts a hearing on standards each fall at the American Dental Association Annual Meeting, which will be held virtually this year. The Commission conducted three virtual hearings this spring due to changes and cancelations of meetings. Additionally, CODA staff is developing an online comment portal that will be accessible through the Commission’s webpage that houses the proposed revisions to Accreditation Standards, which could be implemented later this year. It should be noted that December 2020 training of new Review Committee, Commission, and Appeal Board members will occur virtually. Further, the mandatory annual site visitor training will occur virtually as this is the current method used by CODA for annual training.

10. The Commission may wish to discuss whether the Winter 2021 meetings should be conducted virtually for Commissioners, registered observers, or both groups.

11. How to manage receipt of international PACV surveys and PACV self-studies in the Commission office, as well as the work of the Standing Committee on International Accreditation. See receipt of applications and management of site visits sections of this report.

Consideration of CODA’s Ongoing Operations in Response to the COVID-19 and the Impact on Site Visits: The Commission may wish to consider the following issues, as they relate to ongoing directives of the Commission’s April 2, 2020 meeting:

12. Whether site visitors whose terms end in October 2020 should have an extension of their active term for one additional year, through October 2021, as they were unable to volunteer with CODA in 2020 and may be scheduled for a site visit that was canceled due to COVID-19.

13. Related to the conduct of 2021 site visits, whether the Commission should pursue alternative site visit methods if travel restrictions are in place. Alternative methods may include, but are not limited to, virtual site visits (in part or in whole) to the programs rescheduled in 2021, programs undergoing an application review, and programs scheduled for special focused site visits. It should be noted, by United States Department of Education regulations, if an accreditor conducts virtual site visits, the visits must rely on interaction with the program, not simply a document review, and must be followed up with an in-person visit, within a reasonable period of time, to meet the statutory and regulatory requirements of the Department of Education. Further, the accrediting agency must develop and apply policies and procedures for the conduct of virtual site visits, which are approved by the agency’s Board.

Previously, at its April 2, 2020 meeting, the Commission directed the following, which may be reaffirmed or reconsidered at this meeting:

- Related to “regular/reaccreditation” site visits: The next “regular/reaccreditation” site visit of every CODA-accredited program, excluding the programs already site visited in spring 2020, be shifted forward by one (1) year. The Commission
further directs that each “regular/reaccreditation” site visit in subsequent years also be shifted forward by one year.

- **Related to “special focused” site visits:** Special focused site visits be postponed until the earliest opportunity to conduct the visit. Any program scheduled for a special focused site visit as a result of a potential or identified area(s) of non-compliance was expected to submit a report to the Commission on the area of potential concern, for consideration at the Commission’s Summer 2020 meeting.

- **Related to application site visits:** Previously scheduled site visits to programs applying for initial (first time) accreditation be postponed until the earliest opportunity to conduct the visit.

- **Related to virtual site visits:** Virtual site visits will not be used at this time.

**Summary:** The Commission is requested to consider its ongoing operations and the impact on dental and dental related educational programs as a result of COVID-19.

**Commission Action:**

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