Commission on Dental Accreditation
Orientation for Allied Program Directors with Site Visits 2021-2023

Monday, March 8, 2021
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 Communication 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
  • Allied Standards Revisions
  • Online Resources
Site Visit Letter #1 - Notification of Site Visit

- Sent approximately 1-1.5 years in advance
- Site visit communications regarding the logistical aspects of the site visit are sent by CODA Site Visit Coordinator.
- Letter to CEO and Dean announcing site visit, copy to program directors
- Documents attached to the letter:
  - Site Visit Confirmation of Site Visit Date Form – to be returned
  - Institutional Officers, Program Director and Personnel Data Forms – to be returned

It is very important that you return the documents by the due date to move forward with scheduling your site visit
Site Visit Letter #1: Notification of Site Visit

Forms and documents include:

• Confirmation of Site Visit Date Form - return of form required
• Institutional Officers, Program Director and Personnel Data Forms - return of forms required
• Transportation and Hotel Information Form - return of form required
• Sites Where Education Activity Occurs Form - return of form required
• Accreditation Standards and Self-Study Guide
• Site Visitor Evaluation Report (SVER)
• Electronic Submission Guidelines - provided link to CODA website
• Privacy and Data Security Reminder – provided and link to CODA website

• It is very important that you return the above documents by the due date because we cannot move forward with scheduling your site visit without the documents
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
- If the visit must be extended to accommodate travel to sites, 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

• 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 documentation from Letter #1 has been received by CODA
- Letter and forms to Director (via e-mail); copy 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.

• The program is no longer permitted to “strike” two names from the screening list for no reason

• Please be advised that the Commission automatically screens anyone who works and/or lives in the state the program is located.
In accordance with Commission policy, the program director should draw a line through anyone who:

- is a graduate of a program at the institution;
- has served on the program’s visiting committee within the last ten (10) 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;
- 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 3 to 4 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 from CODA
  – Data Profile (5-year annual survey data)
    • Contains data gathered from programs through the Annual Survey
  – Electronic Submission of Self-Study Guides - provided link to CODA website
  – Privacy and Data Security Reminder - provided link to CODA website
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

Months prior to visit (approximate)

12  Program is notified of site visit date. Develop plan for self-study process, identify resources

6   Prepare rough draft of self-study document. **DO NOT include Protected Health Information (PHI) or Personally Identifiable Information (PII)**

5   Draft document is reviewed institution-wide

4   Self-study document finalized and duplicated

3   Solicit comments in accordance with the “Policy on Third Party Comments”

2   Final self-study document and agenda forwarded to members of visiting committee 60 days prior to visit.
Instructions for Completing the Self-Study

• Available in Word format. **Be sure you complete the most current version**
• Address all Compliance with Commission Policies sections
• Address all standards (with response).
• **DO NOT include PHI or PII, student names, or confidential information.**
• Present in the order of the template provided
• State the question and then provide narrative; don’t rely entirely on appendices and exhibits
• If same information is repeated elsewhere, cross-reference
• Include appropriately indexed sections
• Number pages
Instructions for Completing the Self-Study

- Available in Word format. **Be sure you have the most current version available on the CODA web site**
- Address all Compliance with Commission Policies sections
- Address all standards (with response). **DO NOT include PHI or PII.**
- Present in the order of the template provided
- State the question and then provide narrative; don’t rely entirely on appendices and exhibits
- If same information is repeated elsewhere, cross-reference
- Include appropriately indexed sections
- Number pages
Document should include:

- **Title Page** - 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)

- **Table of Contents** - should include all sections including verification page and appendices

- **Foreword** – At the beginning of the report, a Standard by Standard qualitative analysis of the program’s strengths and weaknesses is required. Categorize any recommendations according to high, medium and low priority; to include **Conduct of Self-Study**
• **Self-Study Report**
  - Previous Site Visit Recommendations
  - Compliance with Commission Policies
    - Third Party Comments
    - Complaints
    - Program Changes
    - Distance Education

• **Program Performance with Respect to Student Achievement**
  - In the self-study, programs are asked to provide a detailed analysis explaining how the program uses student 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 CVs**

• **Conclusions & Summary**
  – List identified strengths and weaknesses
  – Describe action plans for any weaknesses

Self-Study document should be page numbered
Entire Self-Study Should Include, continued

- Previous Site Visit Recommendations
- Compliance with Commission Policies
  - Third Party Comments
  - Complaints
  - Program Changes
  - Distance Education

- Program Performance with Respect to Student Achievement
  - In the self-study, programs are asked to provide a detailed analysis explaining how the program uses student 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
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.
About PHI and PII…

• The program’s documentation for CODA (self-study, application, or reports to CODA, for example) must NOT contain any sensitive personally identifiable information (“Sensitive Information” or “PII”) as outlined in “Privacy and Data Security Requirements for Institutions”. 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 PII and all PHI, including all patient identifiers such that the PII/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.
About PHI and PII…

• When a self-study is received at the CODA office, it is reviewed page by page for PHI and/or PII

• If PHI and/or PII 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
  – Program is asked to send another electronic version of the self-study, minus the PHI or PII, to the visiting committee and the Commission office
  – **Program will be assessed administrative fee of $4,000**
Assembling and Distributing the Self-Study

• Commission requires a complete electronic version of all documents
  – Consider linking appendices, manuals at appropriate places in the narrative
  – 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 appropriate CODA manager and site visit chair once upload is complete.
  – Contact CODA office for access to E-Portal. One access granted per program, for the program director only.

• Review Policy/Guidelines on Electronic Submission of Self-Study
• Reports must be saved or scanned as a **single document**, whenever possible.

• 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.

• Documents should be positioned so that they do not need to be rotated to view.
Electronic Submission of Self-Study, Appendices and Exhibits, continued

• Submission of single page or single document electronic files **is not acceptable.**

• The program must scan or electronically combine the single documents to generate and submit the least amount of documents which adhere to the file size limitation.
Electronic Submission of Self-Study and Reports

Web-based information

• The Commission must retain a snapshot of the information presented at the time of the submission of the report

• The electronic report must not link to information on the Internet

• Insert or “embed” all web-based information into the report
Electronic Submission of Self-Study and Related Materials

• File Formats most typically used:
  – Adobe Portable Document Format (.pdf)
  – Microsoft Word (.doc or docx)

• See CODA Website for:
  – Electronic Submission Guidelines
  – Electronic Portal Access
  – Guidelines for Uploading Documents to Electronic Portal

• Every effort should be made to ensure that the document is concise and contains only the information necessary to demonstrate compliance with the Accreditation Standards.

• If sample completed forms that include fictitious Protected Health Information (PHI) or Personally Identifiable Information (PII) are included, you must mark the document “fictitious sample.” Otherwise, this could be identified as a violation of CODA policy (See Privacy and Data Security reminder at the end of the Guidelines document).
Electronic Submission of Self-Study and Reports

• If marketing brochures/documents, case studies, presentation materials, or examinations include information that could be identified as PHI or PII (e.g., patient photos) are submitted, you must note that appropriate authorization or consent from the patient/person to release the information has been obtained; otherwise, this could be identified as a violation of CODA policy. The inclusion of these types of documents is discouraged.

• Photographs, unless directly related to your submission, should not be included. Further, photographs which require a photo wizard for viewing must not be included. Photos of patients must not be included unless an appropriate authorization or consent has been obtained.
Conduct of the Site Visit
Composition of the Visiting Committee

Committee may include the following members…

- Discipline-specific site visitor(s)
- Allied Dentist*
- NADL Representative*
- State board representative (if invited)
- Silent observer (if requested by CODA)
- Review Committee member and/or Commissioner 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
Composition of the Visiting Committee

Single discipline program visit:

- Two discipline-specific site visitors (one serves as Chair) and other attendees as noted on roster
- 1.75 days in length ends at 3:00 PM on the second day
- Can be extended if multiple sites to visit
Composition of the Visiting Committee

Multi-discipline site visit:

- **2.5 days** in length, ends at **10:00 AM** on third day
- CODA Staff or Site Visit Chair
- One discipline-specific site visitor per discipline
- Allied Dentist
- NADL Representative*
- Other attendees as noted on roster

- 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
  – The state board representative is a member* of the site visit team and will be treated accordingly. He/She is not merely an observer.

*If a vote is required for a recommendation, only the CODA members will vote.
Silent Observation Opportunity

- Request should be made at a minimum one 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, but does not attend the briefing at the end of each day.
- 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) “lockable” meeting room
  – Chair outside for waiting faculty
  – Sign outside

• Multiple program visit:
  – One main (private) “lockable” meeting room for team executive sessions and group interviews
  – One smaller (private) “lockable” 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 shredder
Suggested Site Visit Agenda

- Provided in mailings to program in advance of visit
- **Must** be completed and included with submission of self-study
- Follow suggested agenda *as closely as possible*
- Variations can be discussed with CODA staff and Chair of the visiting committee
- Include Advisory Board Executive Session Luncheon
- Staff/Site visit chair may discuss revisions until team approves
- Have finalized version hard copies available on-site
- Do not plan evening or social activities for the site visitors
- Please check with site visit team regarding inclusion of educational activity sites on agenda
The Agenda Includes …

- Opening interviews with Administration and Director
- Tour of facilities used and Learning Resource Center
- Faculty Interviews
- Advisory Board Session/Luncheon
- Interviews with all students
- Visitation to affiliated sites (if applicable)
- Final conference with Administration and Director
Breakfast/Lunch and Executive Sessions

• Light breakfast and lunch is appreciated.

• 1.75 Day Visit: lunch with Advisory Committee on first day; Day 2 is an executive session lunch

• 2.5 Day Visit:
  – Day 1 – executive session prior to lunch with Advisory Committee/faculty/administration; executive session with Advisory members only after lunch
  – Day 2 – executive session lunch
Tips for Site Visit Schedule

- Program Director/administrator is **not** included in faculty interviews
- **All** students expected for interview
- Follow the template agenda sent in Letter #2
- You have flexibility to some extent with the suggested agenda template; however, all components of the agenda must be included.
Interviews
Program Director and Faculty Roles

• 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 Dean/other leadership must not participate in faculty interviews

NOTE: Confidentiality is stressed in all conferences
Faculty Interviews

✓ Confidential
✓ 10-15 minutes per course
✓ Schedule courses by faculty
✓ 1st year curriculum on 1st day
✓ Faculty with primary responsibility attends
  ✓ Team-taught courses (two primary)
✓ CODA will not interview additional clinical and laboratory faculty
✓ Faculty outside program (possible)
Faculty Interviews

Advise faculty to bring:

✓ Course materials/syllabi/schedules
✓ Completed evaluation examples
✓ Student assignment examples
✓ Be prepared to discuss qualifications
Student Interviews

- Visiting committee will meet with all students as a group (first and second year dental hygiene or dental laboratory technology students)
- Separate conferences are scheduled for the students of each discipline
- Faculty and program director should not participate in student interviews
- NOTE: Confidentiality is stressed in all conferences
Liaison/Advisory Conference

• First day luncheon recommended*

• Program administration and faculty included* (1st half)

• Stress importance of advisory member attendance and prepare them well in advance
  – Should be able to discuss their experiences on advisory

• Allow 30-45 minutes for meal, same for conference with advisory committee members

* Alternatives should be arranged with staff/site visit chair
Tour 2 Extramural Facilities (DA & DLT Only)

Provide list of all extramural clinical/laboratory sites used by the program in the self-study
- Type of facility or practice
- Distance from the school
- Cannot be a site with advisory committee members
- Program director drives and remains in waiting room

Program notifies selected sites about the nature of the visit

Approximately 10-15 minutes per site

Team may speak to office manager, assistant in primary contact with the student, and student (if appropriate)
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 and other individuals as the institution desires)
  – must include the CEO or his/her designee

  *Program may request to combine conferences
Final Conference

✓ Institution determines attendees.
✓ The draft team report is presented **verbally**.
✓ Notes are welcome, but **no recording, smart phones, etc.** allowed.
✓ Take notes and **ask questions** while the team is available.
✓ Chronology of events after visit will be explained.
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
- The Commission grants the accreditation status
After the Final Conference

• Commission Staff is Primary 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
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
What Happens After the Site Visit?
Preliminary Draft Site Visit Report

• Preliminary Draft Site Visit Report in 6-8 weeks
• Program has 30 days to respond to factual inaccuracies or differences in perception
• Program may choose to report progress made toward meeting any recommendations (due by June 1 or December 1)
Preliminary Draft Site Visit Report

- A recommendation is made when the program does not comply with a standard. The program must report changes made to bring the program into 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 no Recommendations as a result of the site visit
  – 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 will be noted in the letter accompanying the draft site visit report
Notification of Accreditation Decisions

- **Winter Meeting:** The Commission considers reports from site visits conducted between May 1 to October 31
- **Summer Meeting:** The Commission considers reports from site visits conducted between November 1 and April 30
- A letter with the accreditation decision is sent within 30 days of the meeting
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

• Follow-up
  – Progress Report
  – Site Visit
  – Documentation Requested for Area(s) of Deficiency
Progress Report

• If Recommendations as a result of CODA review
  – Defined period of compliance
  – Dependent upon length of program, it will receive \textit{up to} 18 or 24 months to demonstrate compliance

• **Note**: If there are outstanding recommendations and the Standard has changed/revised, the institution will be held to the new standard
Updates on Policies and Procedures
• Significant revisions to CODA’s Rules

• Evaluation and Operational Policies and Procedures
  – Redline copy of changes are available at the link below

Policy and Procedure Revisions (Winter 2020)

- Policy on Public Statements (excerpt):

Public Statements: The current Commission Chair, Vice-chair, and Director have the sole authority to speak on behalf of the Commission. No current or former Commission volunteer, including members of the Board of Commissioners, the Review Committees, the Appeal Board, and Consultants/Site Visitors may issue a public statement, or serve on an external committee as a spokesperson in the name of the Commission.
Policy and Procedure Revisions (Winter 2020)

• Establishment of Policy on CODA Administrative Fund (in place of R&D Fund)
  – No Administrative Fund fee to programs in 2021

• Self-Study General Information
  – If the self-study document is submitted with insufficient time for site visitor review, the visit may be canceled. Further, if an opportunity to reschedule the visit within the same calendar year is not available, the Commission will be informed. Failure to submit the self-study within the expected deadline could affect the accreditation status of the program.
Policy and Procedure Revisions (Winter 2020)

• Invoicing Process for Special Focused Site Visits
  – To simplify the fee process for special focused site visits.

• Program Change (enrollment)
  – To clarify that \textit{retroactive permanent} increases in enrollment will not be considered. \textit{Retroactive temporary} increases in enrollment may be considered due to special circumstances on a case-by-case basis.

• Addition to Policy on Reprints
Policy and Procedure Revisions (Summer 2020)

• 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.
• Program Change
  – Addition of distance education methods is a change that requires notice to CODA 30 days prior to implementation but may not require prior CODA approval (as long as the program complies with the policy on distance education)
• Ethics in Programmatic Advertising
  – The sponsor of the educational program must be clearly identified when referencing any educational activity site(s) used by the program.

• Staff Consulting Services
  – Limited to providing information on CODA policies and procedures.
Policy and Procedure Revisions (Winter 2021)

• **Review Committee Criteria**
  – Removal of ADA membership requirement for Review Committee Members
    • **Reminder** – ADA membership also not required for site visitors

• **Conflict of Interest Policy**
  – Site Visitors & Review Committee Members
    • Time limitation for serving on previous site visit team changed from 10 years to 7 years
  – Site Visitors
    • Conflict exists if affiliated with institution/program in same state as a program’s primary location
    • Owning property in same state as program being visited is no longer a conflict
• Application for Accreditation for Developing and Fully Operational Programs
  – First opportunity for Commission to consider a program, provided that the application is in order, is generally 12-18 months following the Commission’s formal acknowledgment of receipt of the application and initiation of the review process.
Policy and Procedure Revisions (Winter 2021)

• Reporting Program Changes
  – Addition of part-time track or multi-degree track, or other track offerings is a change that requires reporting and approval by CODA prior to implementation

• First Year Non-Enrollment
  – Removes exception that only programs with status of “approval without reporting requirements” can request a third year of first year non-enrollment.
• Policy on Reprints
  – Clarifies that “reprint” means reproducing Commission materials in any paper or electronic format.

• Complaint Policy
  – Anonymous Comments
    • Any submitted information that identifies the complainant renders the submission a formal complaint and will be reviewed as such.
Site Visitors Criteria for Appointment: Allied Dental Education in Dental Therapy

- Accreditation experience through an affiliation with a dental therapy, allied, or predoctoral dental program that has completed a site visit; and accreditation experience within the previous three (3) years temporarily waived for dental therapist educator position until after CODA accredits a minimum of three (3) dental therapy education programs.
- Dental therapy site visit team consist of three (3) members as follows: one (1) dental therapist educator, one (1) predoctoral dentist educator (curriculum or clinical site visitor), and one (1) additional site visitor that could be either a second dental therapist educator, second predoctoral dentist educator, or an allied dentist educator. If needed due to lack of dental therapy educator availability, such that if a dental therapy educator cannot be identified in accordance with Commission policy then the three-person site visit team may be composed of predoctoral educators and allied dentists, three (3) people total in any combination.
Appeal Board Procedures

- The Appeal Board may make the following decisions: to affirm, amend, or remand, or reverse the adverse actions of the Commission. A decision to affirm, or amend or reverse the adverse action is implemented by the Commission. In a decision to remand the adverse action for further consideration, the Appeal Board will identify specific issues that the Commission must address. The Commission must act in a manner consistent with the Appeal Board’s decisions or instructions.
Voluntary Discontinuance of Programs

Within ten (10) business days thirty (30) days, Commission staff contacts the institution’s chief executive officer and program director and acknowledges the date when accreditation will lapse (i.e. program’s discontinuance effective date) and the date by which the program will no longer be listed in the Commission's lists of accredited programs (i.e. date of CODA meeting or mail ballot). The USDE Secretary and the state licensing or accrediting agency are copied on this letter. Commission staff will inform the program that any classes enrolled on or after the program’s reported date of discontinuance must be advised that they will not graduate from a CODA-accredited program. (See Policy on Discontinuance or Closure of Educational Programs Accredited by the Commission and Teach-Out Plans)
Due Process – Withdrawal

Procedure For Disclosure Notice Of Adverse Actions:
• The Commission sends notice of any adverse action in a transmittal letter to the appropriate institutional executives no later than fourteen (14) days after the Commission meeting. This letter is sent by certified/tracked mail, (including email), and includes the reasons for any adverse action to deny or withdraw accreditation. All current and prospective students/residents/fellows must be informed of the Commission’s notice of any adverse action within seven (7) business days of the program’s receipt of the notice. The USDE Secretary, the appropriate state entities, and any appropriate institutional accrediting agency are notified at this time, usually by a letter to the Secretary with copies to the other entities and the institution.
• When the final statement (or statement and response) has been developed and signed by both parties, it will be distributed as required in the regulations to the USDE Secretary, to the appropriate state licensing or authorizing agency, to any appropriate institutional accrediting agency, and to the public. All current and prospective students/residents/fellows must be informed of the Commission’s final decision within seven (7) business days of the program’s receipt of the notice.
POLICY ON REGARD FOR DECISIONS OF STATES AND OTHER ACCREDITING AGENCIES

The Commission does not renew the accreditation status of a program during any period in which the institution offering the program:

• Is the subject of an interim action or final decision by a recognized institutional accrediting agency potentially leading to the suspension, revocation, withdrawal, or termination of accreditation or pre-accreditation;

• Is the subject of a decision by a recognized institutional accrediting agency to deny accreditation or pre-accreditation;

• Is the subject of a pending or final n interim action by a state agency potentially leading to the suspension, revocation, withdrawal or termination of the institution's legal authority to provide postsecondary education;

• Has been notified of probation or an equivalent status, or a threatened loss of accreditation, and the due process procedures required by the action have not been completed; and/or

• Has been notified of a threatened suspension, revocation, or termination by a state of the institution's legal authority to provide postsecondary education, and the due process procedures required by the action have not been completed.

In considering whether to grant initial accreditation to a program, the Commission takes into account actions by:

• Recognized institutional accrediting agencies that have denied accreditation or pre-accreditation to the institution offering the program, placed the institution on public probationary status, or revoked the accreditation or pre-accreditation of the institution; and

• State agency that has suspended, revoked, or terminated the institution's legal authority to provide postsecondary education.

If the Commission grants accreditation to a program notwithstanding its actions described above, the Commission will provide to the USDE Secretary, within 30 days of granting initial or continued accreditation, a thorough and reasonable explanation, consistent with the accreditation standards, why the previous action by a recognized institutional accrediting agency or the state does not preclude the Commission's grant of accreditation. The Commission's review and explanation will consider each of the findings of the other agency in light of its own standards. Upon formal request, the Commission will share with other appropriate USDE-recognized accrediting agencies and USDE-recognized State approval agencies information about the accreditation status of a program and any adverse actions it has taken against an accredited program.
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 Information” or “PII”) 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 PII and all PHI, including all patient identifiers such that the PII/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…

• When a self-study is received at the CODA office, it is reviewed page by page for PHI and/or PII

• If PHI and/or PII 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 PII, to the visiting committee and the Commission office
  – **Program will be assessed administrative fee of $4,000**
What’s New at CODA?
2020-2021 CODA Actions of Interest

CODA Fees:

• Annual fees and application fees:
  – 2021 and 2022, 0% fee increase

• Annual administrative fund fee:
  – 2021, $100 (waived); and 2022, $25 per program

• During the year a program is due for a regular accreditation site visit, the annual fee will be doubled.

Note – 2021 fees will be distributed in mid-March and are due by mid-April.

https://www.ada.org/en/coda/accreditation/fees
2020-2021 CODA Actions of Interest

2020:
- CODA directed the initiation of the 2022-2026 Strategic Plan development
  - CODA will conduct a Closed, Mega Issue Discussion on Strategic Plan in Summer 2021

2021:
- CODA directed appointment of a joint Commission on Dental Accreditation (CODA) and Commission on Dental Accreditation of Canada (CDAC) Ad Hoc Committee to examine, at the CDAC’s request, potential inclusion of Oral Medicine in the Reciprocity Agreement between the Commission on Dental Accreditation and the Commission on Dental Accreditation of Canada.
2021 CODA Actions of Interest

• Educational Activity Sites (Ad Hoc):
  – Annual Surveys for dental and advanced dental education programs will be revised to clarify the questions related to educational activity site usage, so that programs accurately and completely report the number of sites used for educational purposes, with implementation Fall 2021.
  – All Review Committees to consider the discipline-specific Accreditation Standards under their purview for potential revision to address expectations related to use of U.S.-based educational activity sites including, but not limited to: 1) consideration of time away from the program and 2) program use of best practices and quality assurance review systems to ensure calibration of faculty, and student/resident/fellow training and evaluation (formative and summative) comparable to the program’s on-site clinic facility, with a report to the Commission in Summer 2021.
Educational Activity Sites (Ad Hoc):

- Use of international educational activity sites not be permitted until the Commission reviews, revises, adopts, and implements changes to its Accreditation Standards to address quality assurance and other expectations for the disciplines under CODA’s purview, as noted above, related to use of domestic educational activity sites.

- After Accreditation Standards are developed and implemented for the use of U.S.-based educational activity sites, the Commission review and revise its Policy Statement on Reporting and Approval of Sites Where Educational Activity Occurs to permit use of internationally located educational activity sites, as permitted by the discipline-specific Standards, and reported, approved and monitored by the Commission through its policies and procedures.
Policy on Electronic Submission of Accreditation Materials

• All institutions will provide the Commission with an electronic copy of all accreditation documents/reports and related materials. The program’s documentation for CODA must not contain any patient protected health information (PHI) or personally identifiable information (PII).

• CODA will no longer accept paper reports from programs; all documents must be submitted electronically, only, via CODA’s email or electronic portal.
CODA Electronic Accreditation Portal

• Live as of February 2021
• Program Access:
  – One (1) login for program director only
  – Submission of Self-Study
  – Submission of large reports that cannot be sent to CODA by email (first contact CODA office)
  – Submission of Application (for program seeking accreditation)

Online Portal Access:
CODA Electronic Accreditation Portal

• 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
Alternative Site Visit Methods (Ad Hoc)

- Policy on Temporary Use of Alternative Site Visit Methods
- Manuals for Programs and Site Visitors
- Informational Videos for Programs and Site Visitors

- CODA directed further study of alternative site visit methods related to the on-site visit following a virtual site visit, and to identify whether any changes in processes or procedures for the conduct of site visits using alternative methods could be implemented long-term.
Alternative Site Visit Methods (Ad Hoc)

- **Program**
  - Program Agreement and Manual

- **Site Visitor**
  - Manual and E-Portal Access
CODA Structure and Function (Ad Hoc)

• Directed establishment of three (3) Review Committees, addition of (3) Commissioners, and addition of (3) Appeal Board Members, effective January 1, 2022
  – Dental Anesthesiology
  – Oral Medicine
  – Orofacial Pain

• Directed further review of policies and procedures on CODA structure and function, which may include development of policies to initiate oversight of discipline in existing review committee and require a minimum number of accredited programs and assurance of sufficient volunteers in the discipline, to warrant establishment of a separate Review Committee and additional Commissioner.
Six (6) Three (3) Advanced Dental Education Review Committees (DENTANESTH*, DPH, OFP*, OMP, OMR, OM* - 5 members each. At least one member must be a dental educator.)

- 1 discipline-specific Commissioner appointed by the discipline-specific sponsoring organization
- 1 public member
- 1 dentist nominated by the discipline-specific sponsoring organization
- 1 dentist nominated by the discipline-specific certifying board
- 1 general dentist

Effective January 1, 2022

Advanced Education in General Dentistry, General Practice Residency, Dental Anesthesiology, Oral Medicine and Orofacial Pain Postdoctoral General Dentistry Review Committee (42 9 members)

- 1 discipline-specific Commissioner, jointly appointed by American Dental Education Association (ADEA), and the Special Care Dentistry Association (SCDA), the American Society of Dentist Anesthesiologists (ASDA), the American Academy of Oral Medicine (AAOM), and the American Academy of Orofacial Pain (AAOP)
- 1 public member
- 2 current General Practice Residency (GPR) educators nominated by the SCDA
- 2 current Advanced Education in General Dentistry (AEGD) educators nominated by ADEA
- 1 oral medicine educator nominated by the American Academy of Oral Medicine
- 1 dental anesthesiology educator nominated by the American Society of Dentist Anesthesiologists
- 1 orofacial pain educator nominated by the American Academy of Orofacial Pain
- 1 general dentist graduate of a GPR or AEGD
- 1 non-general* dentist
- 1 higher education or hospital administrator with past or present experience in administration in a teaching institution
- *a dentist who has completed an advanced dental education program in dental anesthesiology, dental public health, endodontics, oral and maxillofacial radiology, oral and maxillofacial pathology, oral and maxillofacial surgery, oral medicine, orofacial pain, orthodontics and dentofacial orthopedics, pediatric dentistry, periodontics, or prosthodontics.
CODA Actions Related to COVID-19

• Temporary Flexibility for Class of 2021
  – The Commission directed that its 14 Review Committees be consulted related to elements of a site visit that may be conducted virtually versus the elements that must be reviewed on-site.

  – Class of 2021 Temporary Flexibility was issued by CODA on October 13, and published on CODA’s COVID-19 webpage.

CODA Actions Related to COVID-19

- Reporting on Temporary Flexibility for Class of 2021
  - CODA directed that all CODA-accredited programs submit a report on interruption of education for the Class of 2021 by March 19, 2021, for review by the Commission in Spring 2021.
  
  - Report to be submitted to CODA office by email, no later than March 19.

  - Guidelines for Preparation of an Interruption of Education Report for the Class of 2021 are under development and will be circulated when available. (Mini How-To Video to be Provided by CODA)
CODA Actions Related to COVID-19

• Reporting on Temporary Flexibility for Class of 2021
  – Program’s Report May Include the Following:
    • Attestation that no different flexibility has been used for the Class of 2021, beyond what CODA previously approved for the Class of 2020.
    • Attestation that sufficient patient experiences were provided prior to assessment of competence.
    • Description of new/additional flexibility that was required for the Class of 2021.
CODA Actions Related to COVID-19

• 2021 Site Visits:
  – All spring visits will likely be virtual
    • The conduct of a site visit using alternative methods will be based on travel, health and safety concerns and/or restrictions in the geographic location(s) that may be visited by the Commission’s staff and volunteers, or for other reasons deemed appropriate by the Commission during the pandemic (for example, institutional, local, state, or federal directives).
  – Addenda to self-study may be necessary if content has changed. The program will be assessed on the standards in place at the time of the site visit
CODA Actions Related to COVID-19

• 2021 Site Visits:
  – Programs instructed to upload the self-study and addenda (as applicable) into CODA’s secure E-portal, 60 days in advance of the site visit or as soon as notified by CODA staff to do so
  – Programs to be visited fall 2021 will hear from CODA in the coming months
  – Programs to be visited in 2022 will hear from CODA in late summer/early fall.
CODA Actions Related to COVID-19

• Extension of temporary flexibility by United States Department of Education, 180 days beyond the termination date of national emergency

• Stay current on CODA activities (visit website)
CODA Online Resources Related to COVID-19

- Alternative Site Visit Program Agreement
- Program Manual for Alternative Site Visits
- Webinar for Programs on Alternative Site Visits

CODA Call for Nominations

- One (1) Dental Assisting Educator-DA RC
- One (1) Dental Laboratory Technology Educator-DLT RC
- Seven (7) Public Members
  - Five (5) Review Committee Members (DLT, Anesthesiology, Oral Medicine, Orofacial Pain, & Periodontics)
  - Two Public Members for the Commission
CODA Call for Nominations

- Site Visitor Volunteer Nominations for Dental Assisting, Dental Hygiene, and Dental Laboratory Technology


- See webpage for Site Visitor Nomination Criteria and Nomination Form due December 1, 2021.
New and Proposed Accreditation Standards
Revised Standards


• **July 1, 2020 implementation**
  – Dental Assisting
  – Dental Hygiene

• **Winter 2021 CODA meeting, immediate**
  – Dental Assisting (Standards 3-3 and 3-7)
Revised Dental Assisting Standard 3-3

Standard 3-3: The program administrator must be a Dental Assisting National Board “Certified Dental Assistant” or dentist licensed to practice in the state of the program location*, with occupational experience in the application of fourhanded dentistry principles, either as a dental assistant or working with a chairside assistant.

Intent:
A dental hygienist appointed after January 1, 2000, would be eligible for such an appointment after acquiring the “Certified Dental Assistant” credential offered by the Dental Assisting National Board and obtaining occupational experience in the application of clinical chairside dental assisting involving fourhanded dentistry. *A dentist currently licensed in the United States who has obtained a teaching dispensation from the state that grants him/her the ability to practice dentistry as defined by the state’s dental practice act within a teaching institution, is exempt from this requirement. Honorary emeritus status issued by the Dental Assisting National Board is not recognized by the Commission on Dental Accreditation.
Revised Dental Assisting Standard 3-7

Standard 3-7: Laboratory, preclinical and clinical faculty must hold any current dental assisting credential required by the state in addition to a Dental Assisting National Board “Certified Dental Assistant” credential*.

Intent:
Faculty members teaching additional or expanded dental assisting functions should be credentialed appropriately in those functions as required by the state. Faculty who are state-licensed dentists are not required to obtain additional certification. Licensed dental hygiene faculty who teach dental radiography, coronal polishing, and the placement of pit and fissure sealants would be eligible to teach these functions to dental assisting students without obtaining additional certification. Honorary emeritus status issued by the Dental Assisting National Board is not recognized by the Commission on Dental Accreditation.
Revised Standards

• January 1, 2022 implementation
  – Dental Laboratory Technology

• July 1, 2022 implementation
  – Dental Hygiene
Why Stay Informed on Standards Revisions?

• A program’s compliance is evaluated with accreditation standards (“must” statements) that have been adopted and implemented at the time of the site visit.

• Programs may need to modify the self-study if standards have been implemented during the self-study development process.

• It is the program’s obligation to stay up-to-date.
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]

• CODA conducts workshops and posts materials to its website

• Access the CODA website periodically
If in Doubt on Current Standards or Policies:

• Check the CODA website


• Contact CODA staff
Online Resources
“Site Visit Orientation” Web Site


– 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 Allied Dental Site Visit

• **Left navigation to…**
  – Before Your Allied Site Visit
  – During Your Allied Site Visit
  – After Your Allied Site Visit
  – Allied Site Visit Documents
  – Upcoming Allied 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
Policies and Procedures

- Evaluation and Operational Policies and Procedures Manual (EOPP), including
  
  - Complaint Policy
  - Policy and Guidelines for reporting a change, off-campus sites, enrollment
  - Distance Education
Accreditation Updates

http://stage.ada.org/en/coda/accreditation/accreditation-news

• Provides updates policies, procedures and documents resulting from CODA Meetings
• Meeting dates
• Reports of major actions
• Minutes of past meetings
• Hearing information
• Site Visit Schedules
Other CODA Communications

• CODA Communicator E-Newsletter
  – Distributed twice per year, following each Commission meeting

• Commission Alerts Emails
  – Hearings
  – Review Committee Openings
  – Nominations for Site Visitors
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 and also the safe delivery of a program’s self-study to your address.
CODA Contacts

Ms. Michelle Smith, manager, Allied Dental Education
   312-440-4660    smithmi@ada.org

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Ms. Bernadette Molina, site visit coordinator
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Questions?

Thank you