

# Commission on Dental Accreditation Orientation for Dental School Administrators 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
  - Predoctoral Standards Revisions
  - Online Resources

# Timeline for Mailings and Communication from the CODA Office

# Site Visit Letter #1- Notification of Site Visit

- Sent approximately two (2) 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

# 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 Acceptance of Site Visit Dates

- Sent approximately 2-3 months after the documentation from Letter #1 has been received by CODA
- Sent to the Dean
- Letter and forms to Dean (via e-mail); copy to CEO
  - Letter acknowledging confirmation of the site visit date
  - Previous site visit report
  - Timetable for Accreditation Activities
  - Electronic Submission of Self-Study Guides - [link to CODA website](#)
  - Evaluation & Operational Policies and Procedures (EOPP) - [link to CODA website](#)
  - Accreditation Standards, Self-Study Guides, Site Visitor Evaluation Reports
  - Frequency of Citings

# Site Visit Letter #2: (Cont)

- Letter and forms to Dean (via e-mail); copies to CEO
  - Policy on Silent Observer Opportunities
  - CODA Policy on State Board Participation and Role on Site Visit Teams
  - Policy on Conflict of Interest
  - Policy on Complaints Directed at CODA Accredited Programs
  - Policy on Site Visitors
  - State Board Participation Information – to be returned
  - Transportation and Hotel Information – to be returned
  - Site Visit Schedule templates: predoctoral, advanced, and allied – to be returned (later with SSG)

It is very important that you return the following documents by the due date

## Site Visit Letter #3:

- Sent approximately one (1) year prior to the site visit
- Sent to the Dean after the requested documentation in Letter #1 and #2 have been received by the Commission office.
- Letter and forms to Dean (via e-mail); copy to CEO
  - Instructions for materials to be available on-site
  - Electronic Submission of Self-Study Guides - [link for CODA website](#)
  - Educational Activity Sites Form – **to be returned**
  - Screening Lists – **to be returned**
  - Student Notification Letter to distribute to students
  - Third Party Comment Posting
  - Data Profile

It is very important that you return the following documents by the due date.



# Screening Lists for Site Visitors

- Program review of site visitors for conflict of interest:
  - No longer permitted to “strike” names of two potential site visitors for no reason
  - All reported conflicts with potential site visitors must include a reason in accordance with the conflict of interest policy

# Sites Where Educational Activity Occurs Form

- All sites (not the primary clinic) and all program rotations must be documented (clinical and didactic; major and minor sites)
- 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

# Site Visit Letter #4: Final Communication

- Sent approximately 3-4 months prior to the site visit
- Final correspondence from the Site Visit Coordinators sent to the Dean (via e-mail); copy to CEO.
- Site Visit Team Roster
- Remaining communication regarding the site visit is from the Predoctoral Manager

# Further Preparation for Site Visit

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

# Silent Observer Opportunity

- Requests for the opportunity to have a faculty member or administrator observe a site visit are made through a letter from the chief administrative officer (Dean) of the dental education program.
- Requests should be made, at a minimum, a year in advance.
- 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 one opportunity to send one observer to a site visit.

# Consulting: Mock Site Visits

- Active site visitors may independently consult with educational programs accredited by CODA or applying for accreditation
  - All consulting roles must be disclosed to the Commission
  - Site visitors must file a declaration form 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

# The Self-Study Process



# The Self-Study

- **Why conduct a Self-Study?**
  - Assists in preparation for site visit
  - Self assessment of 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)

- 24 Program is notified of site visit date. Develop plan for self-study process, identify resources
- 12 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 provided to members of visiting committee and CODA 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

# 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**

# Entire Self-Study Should Include, continued

- **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

# 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, 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
  - **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 site visit team 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

# Electronic Submission of Self-Study and Reports

- 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

<https://www.ada.org/en/coda/policies-and-guidelines/electronic-submission-guidelines>

# Electronic Submission of Self-Study and Reports

- 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

# Visiting Committee

- Predoc site visitors
  - Site Visit Chair
  - Finance
  - Curriculum
  - Basic Science
  - Clinical Sciences
  - National Licensure
  - State Board of Dentistry Representative (if invited)
- Silent Observer (if assigned and approved)
- 1 Discipline-specific site visitor for each allied discipline being evaluated (DH has 2)
- 1 Discipline-Specific site visitor for each advanced discipline being evaluated (OMS has 2)
- Trainees
- CODA Staff
- Review Committee member and/or Commissioner observer and/or CDAC representative (not silent)

# Verification Activities

- **Interviews**

1. Administrators

- Dean
- Program Directors

2. Faculty and Junior Faculty (chosen by CODA staff)

- What is your role?
- What, when, how do you teach?
- Clinical Supervision
- Calibration
- Your input into conduct and evaluation of the program
- Questions about policies, procedures, tenure, etc.

3. Students

- Open session
- Limited session with class representatives chosen by students

- Review of Documentation

- Observation

# Details, details, details...

- Two (2) “work rooms” needed for entire 2 ½ days of the visit even if only predoctoral program, as needed
  - Executive sessions, meals
  - Work room/gathering space for advanced/allied dental site visitors
  - Computer support; access to printer; access to a shredder
- Nametags, name tents help site visitors identify “who’s who”
- Guides to help site visitors get to the right place
- Dinner suggestions are helpful but not required

# On-Site Documentation

- Must be organized and placed in conference room for each discipline (in addition to SSG)
  - Affiliation agreements
  - Records of each student clinical activity (last class)
  - Evaluations: Teaching staff and student
  - Minutes of standing committees
  - Dental school's manuals

# Site Visit Schedule – Predoc Day 1

- Review of Programs with Dean
- Tour of facility, including biomedical science/research
- Conferences:
  - Institutional Relations (with University president, provost, chancellor, etc.)
  - Institutional Outcomes Assessment
  - Open and limited sessions with Students
  - Quality Assurance and Patient Care Services
  - Finances and Physical Facilities and Equipment
  - Research and Admissions and Educational Support Services
  - Behavioral Sciences, Practice Management and Ethics and Professionalism Outcomes

# Site Visit Schedule – Predoc Day 2

- Continue clinical sciences
- Tour of clinic
- Visitation of sites where educational activity occurs (potential 20 minute overview by program coordinator)
- Faculty/Staff interviews
  - Junior faculty
  - Senior faculty



# Site Visit Schedule – Predoc Day 3

- Additional interviews if necessary
- Final Conference with Dental School Dean and Administration
- Final Conference with University Administration
- End at **10:30 am**, Day 3

# Site Visit Schedules for Developing Programs

- Initial Accreditation Schedule modified to 1.5 days
  - Emphasis is on verification of application plans and potential to meet Standards
- Mid-Cycle Initial Accreditation Schedule is regular duration of 2.5 days
  - Evaluation of preclinical years
  - Progress on moving forward with plans for clinical years, including off-campus sites

# Final Conference

- **Who attends: at discretion of institution**
  - Briefing for Dean and other administrators (separate conferences)
  - Oral report of findings to program and institution
- **If there are recommendations**
  - Program can begin addressing any recommendations before receiving preliminary draft site visit report
  - Suggestions need not be addressed

# Final Conference

- Final verbal report may include:
  - Strengths of program
  - Commendations are no longer part of written report
- Final report will have some language that is not part of verbal report
  - Information judged to be important for next visit team to know (e.g., clinic construction)
  - Template language, including comments on student achievement

# After the Site Visit

# After the site visit...

- **Preliminary Site Visit Report**
  - Receipt approximately 4-6 weeks following the visit
  - Sent to the President
  - Cc: Dean, 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

# After the site visit...

- 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

# Feedback after the visit

- Post-Site Visit Survey
  - E-mailed to program director and CAO
  - CODA requests feedback on site visit logistics and Commission materials
  - CODA requests feedback on site visit/site visitors
  - Please be honest and candid



# Accreditation decisions

- If program is awarded “**approval with reporting requirements**” a progress report will be required in approximately 6 months
  - Programs that are 4 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

# 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

# Updates on Policies and Procedures

# 2020 & 2021 Policy and Procedure Revisions

- Significant revisions to CODA's Rules
- Evaluation and Operational Policies and Procedures
  - Redline copy of changes are available at the link below

<https://www.ada.org/en/coda/policies-and-guidelines/policy-and-procedure-manual>

# 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 *retroactive permanent* increases in enrollment will not be considered. *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.



# Policy and Procedure Revisions (Summer 2020)

- 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)
- Increase in Enrollment for Advanced Education (AEGD, GPR, DentAnesth, OralMed, Orofacial Pain)
  - Enrollment beyond the last site visit or prior approval number must be reported

# Policy and Procedure Revisions (Summer 2020)

- 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

# Policy and Procedure Revisions (Winter 2021)

- 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 and Procedure Revisions (Winter 2021)

- 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.

# Policy and Procedure Revisions (Winter 2021)

## 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.

# Policy and Procedure Revisions (Winter 2021)

## 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.



# Policy and Procedure Revisions (Winter 2021)

## 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)

# Policy and Procedure Revisions (Winter 2021)

## 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 and Procedure Revisions (Winter 2021)

## 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 ~~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.

# 2021 CODA Actions of Interest

- **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:

<https://www.ada.org/en/coda/policies-and-guidelines/electronic-submission-guidelines>

# 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
  - <https://www.ada.org/en/coda/site-visits/site-visit-process-and-schedule>
- Site Visitor
  - Manual and E-Portal Access
  - <https://www.ada.org/en/coda/policies-and-guidelines/training-resources/ongoing-site-visitor-training>

# 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.



# CODA Structure and Function (Ad Hoc)

~~Six (6)~~~~Three (3)~~ Advanced Dental Education Review Committees (DENTANESTH\*, DPH, OFF\*, 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 (~~12~~ 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.

<https://www.ada.org/en/coda/accreditation/accreditation-news/covid-19-updates>

# 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

<https://www.ada.org/en/coda/site-visits/site-visit-process-and-schedule>



# **New and Proposed Accreditation Standards**

# 2019-20 Validity and Reliability Studies of the Standards

## Spring 2019

- Dental Hygiene
- Dental Laboratory Technology
- Endodontics
- Oral and Maxillofacial Radiology
- Oral Medicine

## Fall 2019

- Periodontics
- Oral and Maxillofacial Surgery (Residency and Fellowships)
- Orthodontics and Dentofacial Orthopedics (Residency and Fellowships)

## Spring 2021 (delayed from 2020)

- Predoctoral Dental Education
- Oral and Maxillofacial Pathology

## Spring 2021

- Dental Anesthesiology

# Revised Standards

<https://www.ada.org/en/coda/current-accreditation-standards/revised-accreditation-standards>

- August 3, 2018 implementation
  - Dental Public Health
  - General Practice Residency
  - Advanced Education in General Dentistry

# Revised Standards

- January 1, 2019 implementation
  - Dental Hygiene
  - All Advanced Dental Education Programs
- February 8, 2019 implementation
  - Predoctoral Dental
- July 1, 2019 implementation
  - Predoctoral Dental
  - Clinical Fellowship in Oral and Maxillofacial Surgery
  - Oral and Maxillofacial Surgery Residency

# Revised Standards

- July 1, 2019 implementation (cont.)
  - Periodontics
  - Endodontics
- January 1, 2020 implementation
  - Predoctoral Dental (Standard 2-17 and Standard 6)
  - AEGD, Dental Anesthesiology, DPH, GPR, OMS, Oral Medicine, Orofacial Pain, PROS (“Should” Definition)

# Revised Standards

- **July 1, 2020 implementation**
  - Oral and Maxillofacial Surgery Residency
  - Dental Public Health
  - Dental Assisting
  - Dental Hygiene
  - Predoctoral Dental Education (2-24d caries management, and 2-25 patients with special needs)

# Revised Standards

- **January 1, 2021 implementation**
  - Periodontics
- **Winter 2021 CODA meeting, immediate**
  - Dental Assisting
  - Oral and Maxillofacial Surgery
  - Clinical Fellowship Training Programs in Oral and Maxillofacial Surgery
- **July 1, 2021 implementation**
  - Pediatric Dentistry (comprehensive revision)

# Revised Standards

- **January 1, 2022 implementation**
  - Oral and Maxillofacial Surgery
  - Dental Laboratory Technology
- **July 1, 2022 implementation**
  - Predoctoral Dental Education (2-24k temporomandibular disorders)
  - Dental Hygiene
  - Endodontics
  - Orthodontics and Dentofacial Orthopedics



# Proposed Standards: Comments Due

Comment Due December 1, 2021:

- Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics
- Periodontics

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

<https://www.ada.org/en/coda/accreditation/accreditation-news/open-hearings-comments-due>

# 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

<https://www.ada.org/en/coda/current-accreditation-standards>

- Contact CODA staff

# Predoctoral Standards Revisions

# New Dental Education Standards (7/1/20)

## Standard 2-24

At a minimum, graduates **must** be competent in providing oral health care within the scope of general dentistry, as defined by the school, including:

d. health promotion and disease prevention, including caries management;

# New Dental Education Standards (7/1/20)

**Standard 2-25** Graduates **must** be competent in assessing and managing the treatment needs of patients with special needs.

## **Intent:**

*An appropriate patient pool should be available to provide experiences that may include patients whose medical, physical, psychological, or social situations make it necessary to consider a wide range of assessment and care options. As defined by the school, these individuals may include, but are not limited to, people with developmental disabilities, cognitive impairment, complex medical problems, significant physical limitations, and the vulnerable elderly. ~~The assessment should emphasize the importance of non-dental considerations. These individuals include, but are not limited to, people with developmental disabilities, cognitive impairment, complex medical problems, significant physical limitations, and the vulnerable elderly.~~ Clinical instruction and experience with the patients with special needs should include instruction in proper communication techniques including the use of respectful nomenclature, ~~and assessing the treatment needs compatible with the special need,~~ and providing services or referral as appropriate.*

# New Dental Education Standard (7/1/22)

## Standard 2-24

At a minimum, graduates **must** be competent in providing oral health care within the scope of general dentistry, as defined by the school, including:

k. oral mucosal, temporomandibular, and osseous disorders;



# Online Resources

# “Site Visit Orientation” Web Site

<http://www.ada.org/en/coda/site-visits/prep-for-dds-dmd-site-visit>

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

# Site Visit information: What's Included?

- **The Site Visit Process**
  - Introduction
  
- **Left navigation to...**
  - Predoctoral program
  - Advanced education programs
  - Allied education programs

# 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

# Commission Policies and Procedures

- **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 (U.S. and International)

# 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

# To contact CODA staff

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# To contact CODA staff

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- CODA Mass Communications, Website, Standing Committee on Communication & Technology

# To contact CODA staff

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- Day-to-day operations
- International predoctoral accreditation

## **Ms. Marjorie Hooper, Coordinator**

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QUESTIONS?

Thank You!