

**COMMISSION ON DENTAL ACCREDITATION
DENTAL ASSISTING DISCLOSURE STATEMENT
Brightwood College-Charlotte
Charlotte, North Carolina**

At its February 7, 2019 meeting, the Commission on Dental Accreditation, the only nationally-recognized accrediting agency for dental, allied dental and advanced dental education programs, reviewed the site visit report and the failure to submit requested information related to the dental assisting program offered by the Brightwood College-Charlotte in Charlotte, North Carolina. On the basis of information provided to the Commission by the program, the Commission has issued the accreditation status of “withdraw” to the program.

The Commission determined at its February 7, 2019 meeting that the program was not in compliance with the Accreditation Standards for Dental Assisting Education Programs, the Commission’s Policy on Discontinuance or Closure of Educational Programs Accredited by the Commission and Teach-Out Plans, and the Commission’s Policy on Missed Deadlines. Specific concerns in compliance with the standards and policies were noted in the following areas:

- Institutional Effectiveness (Community Liaison);
- Administration, Faculty, and Staff (Faculty Credentials);
- Administration, Faculty, and Staff (Sufficient Faculty Positions);
- Health and Safety Provisions (Management of Emergencies);
- Teach-Out Plan (failure to submit requested report on a teach-out plan); and
- Missed Deadlines (the program failed to submit requested information).

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

No Response Received from the Institution

3/11/2019

Ms. Tanika Glenn, CEO
Brightwood College-Charlotte
Charlotte, North Carolina

(date)



3/11/2019

Dr. Arthur C. Jee, Chair
Commission on Dental Accreditation
Chicago, Illinois

(date)



Commission on Dental Accreditation

Via Email Transmission: [REDACTED]

FEDERAL EXPRESS
RETURN RECEIPT REQUESTED

March 11, 2019

Ms. Tenika Glenn
Campus President
Brightwood College-Charlotte
6070 E. Independence Blvd.
Charlotte, NC 28212

RE: Dental Assisting Program

Dear Ms. Glenn,

On February 22, 2019, the Commission on Dental Accreditation notified your institution that it had taken action to **withdraw** the accreditation of the dental assisting program sponsored by the Brightwood College-Charlotte, Charlotte, North Carolina. The program was provided an opportunity to appeal the Commission's discussion within fourteen (14) days of receipt of the Commission's letter (no later than **March 8, 2019**).

The institution was requested to review, sign and submit the signed disclosure statement, indicating agreement with the statement regarding the decision by the Commission to withdraw the program's accreditation. The institution was also provided an opportunity to identify factual inaccuracies within the statement and to make official comments with regard to the Commission's decision, or state that the affected institution has been offered the opportunity to provide official comment.

The Commission notes that as of the March 8, 2019 deadline, the program did not submit a signed disclosure or comment related to the Commission's action. In fact, the correspondence sent to the program was returned to the Commission as undeliverable and there was no forwarding contact(s) or mailing address provided.

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

Ms. Tanika Glenn

March 11, 2019

Page 2

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

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

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

Sincerely,



Sherin Tookss, Ed.D., M.S.

Director, Commission on Dental Accreditation

ST/ms/mh

Web Link: [Evaluation and Operational Policies and Procedures](#)

Attachments: Signed Disclosure Statement

cc: Dr. Lachelle Green, director, Education, Brightwood College-Charlotte
Dr. Claudia Casas, interim program director, Dental Assisting Program
Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education (Letter, Disclosure, and Program Statement)
Mr. Bobby White, board administrator/executive director, North Carolina State Board of Dentistry (Letter, Disclosure, and Program Statement)
Ms. Michelle Edwards, president, Accrediting Council for Independent Colleges and Schools, (Letter, Disclosure, and Program Statement)
Dr. Arthur C. Jee, chair, Commission on Dental Accreditation (CODA)
Ms. Cathryn Albrecht, senior associate general counsel, CODA



Commission on Dental Accreditation

Via Email Transmission: [REDACTED]

FEDERAL EXPRESS
RETURN RECEIPT REQUESTED

February 22, 2019

Ms. Tenika Glenn
Campus President
Brightwood College-Charlotte
6070 E. Independence Blvd.
Charlotte, NC 28212

RE: Brightwood College-Charlotte, Charlotte, North Carolina
Dental Assisting Program
Status: Withdraw

Dear Ms. Glenn,

At its February 7, 2019 meeting, the Commission on Dental Accreditation (CODA) granted the dental assisting program the accreditation status of “withdraw.” Below is a summary of actions and additional information.

Site Visit Report

The Commission considered the site visit report on the dental assisting program. Following careful review of the information provided, the Commission adopted a resolution to grant the program the accreditation status of “initial accreditation.” The definitions of accreditation classifications are linked below.

Based on a review of the report, the Commission determined that the following recommendations contained in the site visit report remain unmet: **1, 2, 3, and 4**. When Accreditation Standards are revised during the period in which the program is submitting progress reports, the program will be responsible for demonstrating compliance with the new standards. The “Summary of Recommendations and Required Documentation” found at the end of this letter includes the stated recommendations that remain unmet.

Failure to Submit Teach-Out Report

On December 10, 2018, the Commission on Dental Accreditation (CODA) learned that all campuses under the Education Corporation of America including the Brightwood College closed, effective immediately. On December 10, 2018, Commission staff was informed that the Director of Education, Dr. Lachelle Green, would remain on campus the week of December 10, 2018 to finalize outstanding duties.

On December 11, 2018, Commission staff sent correspondence asking for clarification whether students were currently enrolled in the dental assisting program at the time of the campus closure or if all students graduated prior to the closure. The Commission provided specific instructions for submitting a Teach-Out Plan, due December 13, 2018, to the Commission office. Additionally, Commission staff have left two (2) voicemail messages on December 11, 2018 and December 13, 2018, with no communication from your office.

The Commission notified the Director of Education on December 13, 2018 of the Commission's **intent to withdraw accreditation** at its next scheduled meeting, February 7, 2019 unless the response to the Commission's request for information was successfully submitted in accordance with the Guidelines for Submitting a Teach-Out Plan by no later than **January 3, 2019**. The program has failed to respond.

The Commission's Policy on Missed Deadlines, found within the Commission's Evaluation and Operational Policies and Procedures (EOPP) manual (link below and attached) states in part:

Programs/Institutions must meet established deadlines to allow scheduling of regular or special site visits and for submission of requested information. Program information (i.e. self-studies, progress reports, annual surveys or other kinds of accreditation-related information requested by the Commission) is considered an integral part of the accreditation process. If an institution fails to comply with the Commission's request, or a prescribed deadline, it will be assumed that the institution no longer wishes to participate in the accreditation program. In this event, the Commission will immediately notify the chief executive officer of the institution of its intent to withdraw the accreditation of the program(s) at its next scheduled meeting.

The Commission's Policy on Discontinuance or Closure of Educational Programs Accredited by the Commission and Teach-Out Plans found within the Commission's Evaluation and Operational Policies and Procedures (EOPP) manual (link below and attached) states in part:

It is the responsibility of an institution sponsoring an accredited program to report to the Commission any programmatic change that might affect a program's ability to meet accreditation standards.

When an institution is considering discontinuance or closure of a Commission-accredited educational program that currently enrolls students/residents, the Commission must be notified officially in writing as early as possible in the decision making process. Specifically, the Commission must be informed of the institution's plans for the entire Teach-Out period, during which students/residents are enrolled, including a detailed explanation of any significant changes relative to retention of qualified faculty and support personnel, student/resident enrollment by class, the

didactic and clinical teaching programs (including curriculum, extramural experiences and facilities), and financial support that will be provided. During the period of Teach-Out, the program may not enroll additional students/residents in any year of the program.

The institution must ensure that the program continues to meet minimum accreditation standards and that students/residents and other interested parties are protected throughout the Teach-Out period. In this regard, the Commission reserves the right to closely monitor the Teach-Out through the annual accreditation survey, or periodic reports from the institution detailing changes in administration, faculty, curriculum, facilities, finances, and other major components that could affect the quality of the educational program. In addition, the Commission reserves the right to conduct a special site visit following review of each of these reports. If a program fails to submit a Teach-Out report or requested monitoring information, the Commission will notify the chief executive officer of the institution of its intent to withdraw accreditation at its next scheduled meeting.

At its February 7, 2019 meeting, the Commission noted that the dental assisting program did not submit the requested Teach-Out Plan. Accordingly, the Commission adopted a resolution to **withdraw** accreditation from the dental assisting program.

This action was taken in accordance with the Commission's *Rules* (Article III and Article IV, Sections 4 and 5), which state that the educational program may appeal the Board of Commissioners' decision. **Your written appeal must be received by the Director of the Board of Commissioners within fourteen (14) days of receipt of this letter (no later than March 8, 2019).** The filing of an appeal shall automatically stay the final decision of the Board of Commissioners. If the program does not file a timely appeal of the Board of Commissioners' findings and decisions, the decision shall become final. For your information, the *Rules* are available within the Evaluation and Operational Policies and Procedures Manual, which is linked below.

The Appeal Board is an autonomous body, separate from the Commission. The principal function of the Appeal Board is to determine whether the Commission on Dental Accreditation, in arriving at a decision regarding the withdrawal or denial of accreditation for a given program, has properly applied the facts presented to it to be applicable. In addition, the Commission's *Rules* stipulate that the Appeal Board shall provide the educational program filing the appeal the opportunity to be represented by legal counsel and shall give the program the opportunity to offer evidence and argument in writing and/or orally to try to refute or overcome the findings and decision of the Commission. Also, to ensure due process, the Appeal Board will, when appropriate, review substantive procedural issues raised by the appellants. To this end, the Appeal Board is limited in its

inquiry to the factual determinations up to the time of the Commission on Dental Accreditation's decision regarding the status of the program at issue.

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

Also attached is a disclosure statement regarding the decision by the Commission to withdraw the program's accreditation. Regulation 602.26 of the U. S. Department of Education's *Procedures and Criteria for the Recognition of Accrediting Agencies* requires that any final decision to withdraw the accreditation of a program be reported to such entities as the Secretary of Education, and the appropriate entities, including the public. You are requested to review this statement and, if in agreement, sign and return one (1) original copy to this office. If you believe there to be a factual inaccuracy within this statement, please notify this office in writing. You may also make official comments with regard to the decision, or state that the affected institution has been offered the opportunity to provide official comment. **A response to this disclosure and any comment the institution wishes to submit must be received no later than March 8, 2019.** The final disclosure and program's statement will be distributed to the Secretary of Education, appropriate state licensing and authorizing agencies, to any appropriate institutional accrediting agency and to the public.

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

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

Ms. Tanika Glenn
February 22, 2019
Page 5

If you or members of your staff have questions about the Commission's action, Commission policy, or the application process, please contact me by telephone, at 1-800-621-8099, extension 4660 or by e-mail, at smithmi@ada.org.

Sincerely,



Michelle Smith, RDH, MS
Manager, Allied Dental Education
Commission on Dental Accreditation

MS/ds

Web Links: [CODA Accreditation Status Definitions](#)
[Evaluation and Operational Policies and Procedures](#)
[Due Process Related to Withdrawal of Accreditation \(in EOPP\)](#)
[Procedure for Disclosure Notice of Adverse Actions \(in EOPP\)](#)
[Policy on Missed Deadlines \(in EOPP\)](#)
[Policy on Discontinuance or Closure of Educational Programs Accredited by the Commission and Teach-Out Plans \(in EOPP\)](#)

Attachments: Notice of Reasons for Adverse Actions
Disclosure Statement
Due Process Related to Withdrawal of Accreditation
Procedure for Disclosure Notice of Adverse Actions
Article III Appeal Board
Article IV Accreditation Program

cc: Dr. Lachelle Green, director, Education, Brightwood College-Charlotte
Dr. Claudia Casas, interim program director, Dental Assisting Program
Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education (via CODA website)
Name, Title, State Boards of Dentistry (via CODA website)
Name, Title Institutional Accreditors (via CODA website)
Dr. Arthur C. Jee, chair, CODA
Dr. Sherin Tooks, director, CODA
Ms. Cathryn Albrecht, senior associate general counsel, CODA

**COMMISSION ON DENTAL ACCREDITATION
DENTAL ASSISTING DISCLOSURE STATEMENT
Brightwood College-Charlotte
Charlotte, North Carolina**

At its February 7, 2019 meeting, the Commission on Dental Accreditation, the only nationally-recognized accrediting agency for dental, allied dental and advanced dental education programs, reviewed the site visit report and the failure to submit requested information related to the dental assisting program offered by the Brightwood College-Charlotte in Charlotte, North Carolina. On the basis of information provided to the Commission by the program, the Commission has issued the accreditation status of “withdraw” to the program.

The Commission determined at its February 7, 2019 meeting that the program was not in compliance with the Accreditation Standards for Dental Assisting Education Programs, the Commission’s Policy on Discontinuance or Closure of Educational Programs Accredited by the Commission and Teach-Out Plans, and the Commission’s Policy on Missed Deadlines. Specific concerns in compliance with the standards and policies were noted in the following areas:

- Institutional Effectiveness (Community Liaison);
- Administration, Faculty, and Staff (Faculty Credentials);
- Administration, Faculty, and Staff (Sufficient Faculty Positions);
- Health and Safety Provisions (Management of Emergencies);
- Teach-Out Plan (failure to submit requested report on a teach-out plan); and
- Missed Deadlines (the program failed to submit requested information).

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

Ms. Tanika Glenn, CEO (date)
Brightwood College-Charlotte
Charlotte, North Carolina

Dr. Arthur C. Jee, Chair (date)
Commission on Dental Accreditation
Chicago, Illinois