Commission on Dental Accreditation (CODA) Update

ADEA Fall Meeting (Virtual)
October 30, 2020

Dr. Sherin Tooks, Director, CODA
Updates for 2020…

• What’s New at CODA

• New and Proposed Accreditation Standards

• Update on Policies and Procedures

• Update on COVID-19 Activities

• Online Resources and Staff Contacts
What’s New at CODA
2020 CODA Actions of Interest

CODA by the Numbers:

• 677 accreditation actions, winter and summer CODA meetings

• 11 new programs granted accreditation

• CODA currently accredits 1,417 educational programs
2020 CODA Actions of Interest

CODA Fees:
- 2021 annual fees and application fees will remain unchanged (0% fee increase)
- 2021 annual administrative fund fee of $100 per program will be waived.
- During the year a program is due for a regular accreditation site visit, the annual fee will be doubled.

Note – 2020 fees were to be paid in March.
2020 CODA Actions of Interest

Other Activities:

• CODA directed the initiation of the 2022-2026 Strategic Plan development

• Three (3) Ad Hoc Committees formed to review Validity and Reliability Surveys (OMS, ORTHO, PERIO)
CODA’s Development of Electronic Accreditation System

• Electronic accreditation tool is currently under development
• Will provide access to institutional personnel for upload of Self-Study, program reports, and other communications to CODA
• Will allow site visitor review of Self-Study and completion of SVER online
• Will allow CODA staff to transmit communications and information to programs
• More information to come…
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 2020 (delayed until 2021)
• Predoctoral Dental Education
• Oral and Maxillofacial Pathology
Revised 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)

• January 1, 2021 implementation
  – Periodontics
Revised Standards

• July 1, 2021 implementation (cont.)
  – Pediatric Dentistry (comprehensive revision)

• July 1, 2022 implementation
  – Predoctoral Dental Education (2-24k temporomandibular disorders)
Proposed Standards: Comments Due

Comment Due December 1, 2020:

• Dental Hygiene
• Dental Laboratory Technology
• Endodontics
• Oral and Maxillofacial Surgery

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;
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.
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;
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

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

• Check the CODA website

• Contact CODA staff
Update on Policies and Procedures
2020 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

• 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.
• Establishment of Policy on CODA Administrative Fund (in place of R&D Fund)

• 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 circumnutes 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)

• 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.
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.
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**
NEW: 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.
Call for Nominations: Site Visitors

- Site Visitor Nomination Form, Criteria for Nomination of Site Visitors & CODA Site Visitor Job Descriptions available on CODA website here: https://www.ada.org/en/coda/accreditation/accreditation-news/call-for-nominations

- Deadline for Review at CODA Winter 2021 meetings is December 1, 2020
Call for Nominations: Review Committees

• CODA seeks nominations for various positions on review committees.

• Nomination Deadline is June 1, 2021

• List of Positions, Nomination Criteria, and Nomination Form found at https://www.ada.org/en/coda/accreditation/accreditation-news/call-for-nominations
Update on COVID-19 Activities
CODA Actions Related to COVID-19

• Recap of Events Since March 2020
  – CODA directed all 2020 site visits be canceled and moved forward by one year (regular visits)
  
  – CODA delayed special focused and application visits until 2021, first available opportunity
  
  – CODA refunded doubled annual fee for programs whose regular site visits were canceled in 2020 (the fee will be applied in 2021).
CODA Actions Related to COVID-19

• Recap of Events Since March 2020
  – CODA issues temporary flexibility for the Class of 2020, including temporary use of distance education

  – CODA directed every program to submit a report on temporary flexibility for the Class of 2020

  – The Commission extended the current flexibility for temporary use of distance education through December 31, 2020, with no further reporting required by programs.
CODA Actions Related to COVID-19

Electronic Submission:

- The Commission directed development of an electronic system to accept applications and other types of program reports (for program submission, CODA staff retrieval, site visitor access, as needed). The Commission further directed that program materials be submitted electronically, solely, upon development of the electronic system. The Commission further directed that, upon implementation of the electronic document submission system, the Commission’s acceptance of applications for accreditation be resumed. The Commission further directed that the electronic document submission process be applied to the CODA international PACV process as it is applied to US-based programs.
CODA Actions Related to COVID-19

• Alternative Site Visit Methods:
  – The Commission directed that it pursue alternative site visit methods, as needed to employ in 2021.
  – The Commission directed investigation and development of policies and procedures for alternative site visit methods, with a report to CODA in Winter 2021.
  – The Commission directed appointment of an Ad Hoc Committee to study virtual site visits, including development of policies and procedures for the conduct of virtual visits, for consideration by the Commission in Winter 2021.
• 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.
  – Programs will be expected to report on all aspects of temporary flexibility used up to the time of submission; therefore, submissions prior to March 1, 2021 are discouraged.
  – **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
  – Notifications are being sent to programs asking for a review of previously submitted paperwork and confirmation of a new site visit date.
  – 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.
  – Programs will be instructed to upload their self-study and addenda (as applicable) into CODA’s secure portal, once the portal is open, and 60 days in advance of the site visit.
CODA Actions Related to COVID-19

• Unknowns (?):
  – Extension of temporary flexibility by United States Department of Education?
    • Flexibility currently terminates December 31, 2020.
  – Ability for CODA to conduct in-person site visits in 2021?
  – Circumstances surrounding COVID-19 in a program’s location and additional impact to education between now and next spring?

Stay current on CODA activities (visit website)
Online Resources and Staff Contacts
On-Demand Webinar

• An Introduction to CODA: A Briefing on the Commission on Dental Accreditation for Program Directors


(Note: The videos on this webpage are being updated – please check this page occasionally for their re-posting)
Comission 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

https://www.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

Staff contacts are found on CODA’s website:
https://www.ada.org/en/coda/accreditation/coda-membership/coda-staff

***At this time, CODA staff continue to work remotely. Please contact staff by email and phone. Do not send mail to the Commission office.

Commission on Dental Accreditation
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