Welcome to the CODA Question and Answer Session
Welcome and Introductions

• Welcome to the Commission on Dental Accreditation’s Question and Answer Session, we are happy that you joined us.

• Introductions:
  – CODA Leadership
  – CODA Commissioners
  – CODA Staff
Ground Rules for CODA Q&A Session

• This session is NOT a hearing on standards, there will be no comments received on CODA standards, policies and/or procedures during this session.

• Similarly, there will be no debates related to activities of the Commission.

• CODA members and staff are here to provide information and address questions of a general nature related to CODA activities.

• Please keep in mind that you are here with many other colleagues; therefore, your questions should be of a general nature so that your confidential program information is not shared publically.
What We’ll Discuss….

• Accreditation Standards Revisions

• Policy and Procedure Updates

• What’s New at CODA

• Online Resources and Staff Contacts

• Q&A, as time permits
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


• 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.

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

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

- Check the CODA website


- Contact CODA staff
Policy and Procedure Updates
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

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.
• 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.
• 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 circumnutates 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
• 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 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 Program 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:
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.
• 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)
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)
• **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
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
CODA Site Visitors

• Remember, annual paperwork and mandatory annual training are required to maintain active status.
  – December 2020 annual training quiz now due
• Please reply to CODA staff emails in a timely fashion.
• Site Visitor Nomination Form found at https://www.ada.org/en/coda/accreditation/accreditation-news/call-for-nominations
To contact CODA staff

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

Please contact staff by email and phone.
Do not send mail to the Commission office.

Commission on Dental Accreditation
211 E. Chicago Ave., Chicago IL 60611