

**DISCLOSURE STATEMENT  
INTERNATIONAL DENTAL EDUCATION PROGRAM  
Universidad de la Salle Bajío  
Leon, Guanajuato, Mexico**


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 an application for initial accreditation of the fully operational international dental education program offered by Universidad de la Salle Bajío in Leon, Guanajuato, Mexico. On the basis of information provided in the application, the Commission was unable to grant “accreditation [with or without] reporting requirements” status to the program.

The Commission determined at its February 7, 2019 meeting, that the application did not provide sufficient information and assurances that the program meets the intent of the Accreditation Standards for Dental Education Programs. Specific concerns in compliance with the standards were noted in the following area(s):

- Institutional Effectiveness (outcomes assessment and curriculum management plan);
- Curriculum Management (availability of adequate patient experiences);
- Behavioral Sciences (documentation of student competence);
- Practice Management and Health Care Systems (documentation of student competence)
- Clinical Sciences (documentation of student competence in providing oral health care within the scope of general dentistry in replacement of teeth including dental implant prosthodontic therapies); and
- Students Services (due process and protection of the rights of students).

The Commission informed the program and sponsoring institution that these specific concerns would need to be addressed before the institution reapplied for “accreditation [with or without] reporting requirements” of the international dental education program.

Signature Requested, Not Received 3/19/2019  
\_\_\_\_\_  
Hno. Marco Aurelio González Cervantes, CEO (date)  
Universidad de la Salle Bajío  
Leon, Guanajuato, Mexico

 3/19/2019  
\_\_\_\_\_  
Dr. Arthur C. Jee, Chair (date)  
Commission on Dental Accreditation  
Chicago, Illinois



Commission on Dental Accreditation

Via Email Transmission: [REDACTED]

**FEDERAL EXPRESS**  
**RETURN RECEIPT REQUESTED**

March 19, 2019

Hno. Marco Aurelio González Cervantes  
Av. Universidad 602, Col. Lomas del Campestre.  
C.P. 37150  
León, Gto.  
México

RE: International Dental Education Program

Dear Hno. Cervantes,

On February 21, 2019, the Commission on Dental Accreditation notified your institution that it had taken action to **deny** the accreditation of the fully operational international dental education program sponsored by the Universidad de la Salle Bajío, Leon, Guanajuato, Mexico. The program was provided an opportunity to appeal the Commission's decision within fourteen (14) days of receipt of the Commission's letter (no later than March 7, 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 deny 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 noted that the program submit a comment on March 7, 2019, which was subsequently modified and submitted on March 13, 2019. Following several communications with the program's representative, including most recently on March 18, 2019, it was noted that the program did not submit the signed disclosure statement. Attached for your record is a disclosure statement signed by the Commission Chair along with the institution's official comment of March 13, 2019. The Commission understands the program has elected to not appeal the Commission's February 7, 2019 decision.

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 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.

Hno. Marco Aurelio González Cervantes

March 19, 2019

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The Commission has informed the program and sponsoring institution that the specific concerns would need to be addressed before the institution reapplied for “accreditation [with or without] reporting requirements” of the fully operational international dental education program. 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 wish to reapply for accreditation, 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](mailto:tookss@ada.org).

Sincerely,



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

Director, Commission on Dental Accreditation

ST/st

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

Attachments: Disclosure Statement Signed by CODA Chair  
Universidad de la Salle Bajío Program Statement

cc: Dr. Jorge Triana Estrada, dean, Dental School [REDACTED]  
Ms. Michelle Rubalcava, senior counsel, Nielsen Merksamer  
[REDACTED]  
Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of  
Education (Letters, Disclosure, and Program Statement)  
Ms. Karen Fischer, executive officer, Dental Board of California (Letters, Disclosure, and  
Program Statement) [REDACTED]  
Dr. Arthur C. Jee, chair, Commission on Dental Accreditation  
Ms. Cathryn Albrecht, senior associate general counsel, CODA

**DISCLOSURE STATEMENT  
INTERNATIONAL DENTAL EDUCATION PROGRAM  
Universidad de la Salle Bajío  
Leon, Guanajuato, Mexico**


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 an application for initial accreditation of the fully operational international dental education program offered by Universidad de la Salle Bajío in Leon, Guanajuato, Mexico. On the basis of information provided in the application, the Commission was unable to grant “accreditation [with or without] reporting requirements” status to the program.

The Commission determined at its February 7, 2019 meeting, that the application did not provide sufficient information and assurances that the program meets the intent of the Accreditation Standards for Dental Education Programs. Specific concerns in compliance with the standards were noted in the following area(s):

- Institutional Effectiveness (outcomes assessment and curriculum management plan);
- Curriculum Management (availability of adequate patient experiences);
- Behavioral Sciences (documentation of student competence);
- Practice Management and Health Care Systems (documentation of student competence)
- Clinical Sciences (documentation of student competence in providing oral health care within the scope of general dentistry in replacement of teeth including dental implant prosthodontic therapies); and
- Students Services (due process and protection of the rights of students).

The Commission informed the program and sponsoring institution that these specific concerns would need to be addressed before the institution reapplied for “accreditation [with or without] reporting requirements” of the international dental education program.

Signature Requested, Not Received 3/19/2019  
\_\_\_\_\_  
Hno. Marco Aurelio González Cervantes, CEO (date)  
Universidad de la Salle Bajío  
Leon, Guanajuato, Mexico

 3/19/2019  
\_\_\_\_\_  
Dr. Arthur C. Jee, Chair (date)  
Commission on Dental Accreditation  
Chicago, Illinois

March 13, 2019

Sherin Tooks, Ed.D., M.S.  
Director  
Commission on Dental Accreditation  
211 East Chicago Avenue, Suite 1900  
Chicago, Illinois 60611-2637  
***Via Electronic Mail: [tookss@ada.org](mailto:tookss@ada.org)***

**RE: International Dental Education Program**

Dr. Tooks:

We are writing on behalf of our client, the Universidad de la Salle Bajio (University). The University is in receipt of your letter, dated February 21, 2019, wherein CODA informs the University that CODA has taken the action of denying accreditation of the fully operational international dental education program offered by Universidad de la Salle Bajio.

The University is very disappointed in this action, as years were dedicated to this process, as well as countless hours and resources.

The University is aware of the procedural rights available at this juncture. This letter should serve as notice to CODA that the University declines the right to appeal CODA's decision.

Respectfully Submitted,



Michelle Rubalcava, Esq.  
Senior Counsel



Commission on Dental Accreditation

**FEDERAL EXPRESS**  
**TRACKING REQUESTED**

*Via Electronic Mail:* [REDACTED]

February 21, 2019

Hno. Marco Aurelio González Cervantes  
Av. Universidad 602, Col. Lomas del Campestre.  
C.P. 37150  
León, Gto.  
México

RE: International Dental Education Program  
Status: Deny Accreditation

Dear Hno. Cervantes,

As you will recall, at its August 2, 2018 meeting, the Commission on Dental Accreditation (CODA) denied “accreditation [with or without] reporting requirements” for the fully operational international dental education program offered by Universidad de la Salle Bajío, Leon, Guanajuato, Mexico. The Commission determined that the program did not comply with Recommendations #2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14 pertaining to the November 2017 site visit and noted within the site visit report approved by the Commission on August 2, 2018. On September 12, 2018, the program requested a stay of the Commission’s decision and an appearance before the Commission through its Review Committee on Predoctoral Dental Education at its January 7-8, 2019 meeting. The Commission granted the request as noted in the Commission’s letter of September 25, 2018.

At its February 7, 2019 meeting, the Commission on Dental Accreditation (CODA) denied “accreditation [with or without] reporting requirements” for the fully operational international dental education program offered by Universidad de la Salle Bajío, Leon, Guanajuato, Mexico. The definitions of accreditation classifications are linked below. Below is a summary of actions and additional information.

The Commission carefully considered the site visit report, the institution’s/program’s December 1, 2018 progress report, December 31, 2018 supplemental progress report, and information obtained during the program’s January 8, 2019 special appearance before the Review Committee on Predoctoral Dental Education, for “accreditation [with or without] reporting requirements” of the fully operational international dental education program. The Commission noted that, in accordance with CODA’s policy on Due Process Related to Denial of Initial

Accreditation, the program declined the opportunity to make a special appearance before the Commission during its February 7, 2019 meeting.

Following careful consideration of the site visit report and program's responses, the Commission adopted a resolution to **deny** "accreditation [with or without] reporting requirements" status to this program. In taking this action the Commission determined that the fully operational international dental education program did not provide sufficient information and assurances that it meets the Accreditation Standards for Dental Education Programs. Specifically, the Commission was concerned with the program noncompliance with recommendations cited within the site visit report approved by the Commission on August 2, 2018. The Commission noted that of the 14 recommendations cited, two (2) had been satisfied in Summer 2018 and four (4) had been satisfied in Winter 2019; however, **Recommendations # 2, 4, 5, 7, 9, 10, 11, and 14** remained unmet. Further information is provided in the "Summary of Recommendations" found at the end of this letter.

The Commission's policy on Due Process Related to Denial of Initial Accreditation and *Rules* (Article III and Article IV, Sections 4 and 5) state that if, following reconsideration, the Commission again denies accreditation to the program, the program will be notified of its right to appeal this decision to the Appeal Board. **The institution must file a written request of appeal to the Director of the Commission within fourteen (14) days of the institution's receipt of notification of the Commission on Dental Accreditation's decision to deny accreditation; therefore, the program must reply to this communication by no later than March 7, 2019.** The filing of an appeal shall automatically stay the final decision of the Board of Commissioners.

If an intent to appeal is received, the usual appeal procedures are followed. The appeal date shall be within sixty (60) days after the appeal has been filed. The costs of the Commission respecting such appeal shall be shared equally by the Commission and the appellant educational program filing the appeal except in those instances where equal sharing would cause a financial hardship to the appellant. However, the educational program shall bear the cost of its representatives for the appeal. Attached you will find the Commission's Policy on Appeal Procedures.

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 Commission's 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.

If the program does not file a timely request for an appeal, the Board of Commissioners' findings and proposed decision shall become final fourteen (14) days after the date on this transmittal letter. During the same fourteen (14) days, the institution/program will be asked to review the attached disclosure statement regarding the decision by the Commission to deny "accreditation [with or without] reporting requirements" of the program. 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. A response to this disclosure must be received no later than **March 7, 2019 (absent a request for appeal)**. Please review the Commission's Notice of Reasons for Adverse Actions and Procedure for Disclosure Notice of Adverse Actions, which are enclosed.

Regulation 602.26 of the U. S. Department of Education's *Procedures and Criteria for the Recognition of Accrediting Agencies* requires that any final adverse accreditation action (e.g., deny accreditation) be reported to such entities as the Secretary of Education and other appropriate entities, including the public. If the Commission's decision to deny accreditation becomes final, the action will be reported to the Secretary of Education, appropriate state licensing and authorizing agencies, to any appropriate institutional accrediting agency and to the public. Further, the Commission's final decision, the statement summarizing the reasons for the Commission's decision, and the program's official comments will be posted on the Commission's website no later than sixty (60) days after the decision is final.

Should the fully operational international dental education program choose to reapply, rather than request an appeal of the Commission's decision, a second application fee must be submitted with the program's reapplication.

The findings of the Commission on Dental Accreditation are noted in the enclosed Commission approved site visit report, which was approved August 2, 2018. Oral comments made by site visit team members during the course of the site visit are not to be construed as official site visit findings unless documented within the site visit report and may not be publicized. Further, publication of site visit team members' names and/or contact information is prohibited.



Hno. Marco Aurelio González Cervantes  
February 21, 2019  
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One copy of this letter and the related enclosures has also been sent to the chief administrative officer and program director copied on this letter. The Commission requests that a copy of this report and the related enclosures be forwarded to the chairpersons and appropriate faculty.

The Commission wishes to thank you for your past cooperation. 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](mailto:tookss@ada.org).

Sincerely,



Sherin Tookss, EdD, MS  
Director, Commission on Dental Accreditation

ST/dw

Web Links: [CODA Accreditation Status Definitions](#)  
[Evaluation and Operational Policies and Procedures](#)

Enclosures: Formal Report of the Site Visit  
Summary of Recommendations (attached)  
Due Process Related to Denial of Initial Accreditation  
Function and Procedures of the Appeal Board  
Notice of Reasons for Adverse Actions  
Procedure for Disclosure Notice of Adverse Actions  
*Rules of the Commission on Dental Accreditation*  
Disclosure Statement (attached)

cc: Dr. Jorge Triana Estrada, dean, Dental School [REDACTED]  
Ms. Michelle Rubalcava, senior counsel, Nielsen Merksamer  
[REDACTED]  
Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education  
(via CODA website, upon final action by CODA)  
State Boards of Dentistry (via CODA website, upon final action by CODA)  
Dr. Arthur C. Jee, chair, CODA  
Ms. Cathryn Albrecht, senior associate general counsel, CODA

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Hno. Marco Aurelio González Cervantes, CEO (date)  
Universidad de la Salle Bajio  
Leon, Guanajuato, Mexico

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