COMMISSION ON DENTAL ACCREDITATION
DENTAL HYGIENE DISCLOSURE STATEMENT
Argosy University
Eagan, Minnesota

At its August 1, 2019 meeting, the Commission on Dental Accreditation, the only nationally-recognized accrediting agency for dental, allied dental and advanced dental education programs, reviewed the dental hygiene program offered by the Argosy University in Eagan, Minnesota. On the basis of information provided to the Commission, the Commission has issued the accreditation status of “withdraw” to the program.

The Commission determined at its August 1, 2019 meeting that the program was not in compliance with the Commission’s Policy on Discontinuance or Closure of Educational Programs Accredited by the Commission and Teach-Out Plans. Specific concerns in compliance with the policy were noted in the following area(s):

Failure to submit a teach-out report. 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.

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

Mr. Mark Dottore, Receiver
Argosy University
Cleveland, Ohio

8/13/19

8/14/2019

Dr. Arthur C. Jee, Chair
Commission on Dental Accreditation
Chicago, Illinois
August 14, 2019

Mr. Mark Dottore,
Receiver, Argosy University

Mr. James W. Ehrman
Counsel for Mark E. Dottore, Receiver
2344 Canal Road, Suite 401
Cleveland, Ohio 44113-2535

RE: Dental Hygiene Program – Withdrawal of Accreditation

Dear Mr. Dottore and Mr. Ehrman,

On August 9, 2019, the Commission on Dental Accreditation notified your institution that it had taken action to withdraw the accreditation of the dental hygiene program sponsored by the Argosy University in Eagan, Minnesota. 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 August 23, 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 received the institution’s signed disclosure statement and comment on August 13, 2019. Attached for your record is a dually signed disclosure statement; it was noted that the institution did not submit an official comment. The Commission understands the program has elected to not appeal the Commission’s August 1, 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.
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 Tooks, Ed.D., M.S.
Director, Commission on Dental Accreditation

Web Link:  Evaluation and Operational Policies and Procedures
Attachments:  Signed Disclosure Statement

cc:  Dr. John Slama, campus president, Argosy University  
     Dr. Kristin Benson, vice president, Academic Affairs and college dean, Health Sciences, Argosy University  
     Ms. Debra Arver, program chair, Dental Hygiene Program  
     Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education (via CODA website)  
     Ms. Bridgett Anderson, executive director, Minnesota Board of Dentistry (via CODA website)  
     Ms. Jamienne S. Studley, president, WASC Senior College and University Commission (via CODA website)  
     Dr. Arthur C. Jee, chair, CODA  
     Ms. Cathryn Albrecht, senior associate general counsel, CODA
RE: Dental Hygiene Program – Withdrawal of Accreditation

Dear Mr. Dottore and Mr. Ehrman,

As you may recall, on April 5, 2019 the Commission on Dental Accreditation (CODA) requested that the dental hygiene program sponsored by Argosy University in Eagan, Minnesota submit the mandatory Teach-Out Report related to the sudden closure of the program and University. For your information, the Commission made similar requests to obtain a teach-out report on February 12 and March 8, 2019. The University closed on March 8, 2019.

At its August 1, 2019 meeting, the Commission noted that on Friday, January 18, 2019, Argosy University entered into a federal receivership with Dream Center Education Holdings (DCEH) overseeing all legal business operations. The Commission also noted that on February 12, 2019 a request for a mandatory Teach-Out Report was sent to the Program Director of the Argosy Dental Hygiene program, upon the Commission learning that the University may close. A second request was sent on March 8, 2019 for a mandatory Teach-Out Report to be submitted to the Commission on Dental Accreditation. A third and final request was sent directly to Mr. James W. Ehrman, counsel, and Mr. Dottore, Receiver for Argosy University, on April 5, 2019, to submit a mandatory Teach-Out Report.

The Commission noted that the University failed to submit the required Teach-Out Report pertaining to the closure of the University and dental hygiene program. Accordingly, the Commission adopted a resolution to withdraw accreditation from the dental hygiene program. The definitions of accreditation classifications are linked below.
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 August 23, 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 public comment the institution wishes to submit must be received no later than August 23, 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, residents currently enrolled in, and who successfully complete, the program are considered graduates of an accredited program. Students 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 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 Tooks, Ed.D., M.S.
Director, Commission on Dental Accreditation

ST/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)

Attachments: Notice of Reasons for Adverse Actions
Disclosure Statement
cc:  Dr. John Slama, Campus President, Argosy University  
Dr. Kristin Benson, vice president, Academic Affairs and college dean, Health Sciences, Argosy University  
Ms. Debra Arver, program chair, Dental Hygiene Program  
Mr. Herman Bounds, Jr., director, Accreditation Division, U.S. Department of Education (via CODA website)  
Ms. Bridgett Anderson, executive director, Minnesota Board of Dentistry (via CODA website)  
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