

COMMISSION ON DENTAL ACCREDITATION

GUIDELINES FOR SUBMITTING TEACH-OUT REPORTS BY INSTITUTIONS DISCONTINUING OR CLOSING COMMISSION-ACCREDITED EDUCATIONAL PROGRAMS

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.

The institution has moral and ethical obligations to meet the commitment and responsibility it assumes when it matriculates students/residents into the program; those obligations include providing the students/residents with the opportunity to complete the educational sequence at that institution. When an institution indicates its intent to close an accredited program or to voluntarily discontinue participation in the Commission's accreditation program, and if there will not be adequate resources for the program to meet its obligations to enrolled students/residents and allow them to complete their training, the institution must assist students/residents in a timely fashion in transferring to other accredited programs in order to complete their educational program. The Commission will assist students/residents in transferring to other accredited programs; this assistance will be provided in the form of guidance with reporting program changes to CODA for review, in cooperation with the institution that sponsors the closing program.

The program to which students/residents transfer should be able to demonstrate that the finances, facilities, faculty and patient resources can accommodate the transferring students/residents. Any changes in program enrollment that would result from the transfer of students/residents must be reported to the Commission by the receiving program(s) in accordance with the Commission's policy for reporting program changes. Formal teach-out agreements must be developed with all institutions accepting transferring students/residents to specify the conditions of the transfer. These agreements must ensure that the combined educational experiences meet the Commission's accreditation standards. Such teach-out agreements must be submitted to the Commission as part of the Teach-Out plan.

Students/Residents who are enrolled and successfully complete the program during the Teach-Out will be considered graduates of an accredited program. Students/Residents who transfer to another program and successfully complete that program will be considered graduates of the latter program. Such students/residents will be considered graduates of an accredited program if the latter program is accredited during the time such students/residents are enrolled. It will be the closing institution's responsibility to ensure that appropriate student/resident records and transcripts are maintained for future reference.

The Commission will take action to affirm a program's reported discontinuance or closure effective date at the appropriate time when the program no longer enrolls students/residents in any year of the program. The Commission has developed Guidelines for Submitting Teach-Out Reports by Institutions Discontinuing or Closing Commission-Accredited Educational Programs to assist institutions with preparing teach-out reports for the Commission. These guidelines are routinely distributed along with the Commission's Policy on Discontinuance or Closure of Educational Programs.

Revised: 8/17; 2/16; 8/15; 5/93; Reaffirmed: 8/20; 8/10, 7/07, 07/01, 12/92,
12/85, 12/79

PURPOSE: A "Teach-Out Report" must be submitted to the Commission on Dental Accreditation (CODA) when an institution has informed the Commission that it intends to discontinue or close a Commission-accredited program. See the Policy on Discontinuance or Closure of Educational Programs Accredited by the Commission and Teach-Out Plans. The Commission must be informed (via a Teach-Out Report) of the institution's plans for the entire teach-out period, including how the program will continue to meet the Accreditation Standards and protect students/residents and other interested parties during this time.

CONSULTATION: When an institution is considering discontinuance or closure of a Commission-accredited educational program, the Commission must be notified in writing as early as possible in the decision-making process. Programs are urged to consult with Commission staff as they develop the Teach-Out Report to assist with adequate documentation to ensure the program's continued compliance with the Accreditation Standards through the teach-out period.

PROCESS: The Commission uses the following process when considering Teach-Out Reports.

1. Initial notice of intent to discontinue or close a Commission-accredited program is provided to the Commission through correspondence from the chief executive officer. The letter of intent must identify the number of students/residents enrolled, expected date of graduation of the last class of students/residents, and effective date of program discontinuance or closure following graduation of the last class of students/residents.
2. Following submission of initial notice of intent, a Teach-Out Report must be submitted to document how the program will continue to meet Accreditation Standards and protect students/residents and other interested parties throughout the teach-out period.
3. The report is reviewed for completeness by Commission staff. Additional information may be requested prior to review by the Commission if the teach-out process is not adequately documented.
4. The Teach-Out Report is added to the agenda for the next scheduled meeting of the Commission. The chief executive officer receives notice of the Commission's action within 30 days following the meeting; a copy is sent to the program administrator.

FORMAT: The report must be clear and concise and must follow the “Format” and “Mechanics” illustrated within this guideline. Reports that fail to adhere to the stated guidelines will be returned to the program for proper formatting. The Teach-Out Report must include a detailed and comprehensive section for each of the following pertinent aspects of the program, as well as any other issues relating to protection of students/residents and other involved parties to document that the program continues to comply with the Accreditation Standards and maintains adequate resources during the teach-out:

- student/resident enrollment by class/year
- curriculum (didactic, laboratory and clinical)
- facilities (including extramural/affiliated experiences)
- financial support
- retention of qualified administrators, faculty and support personnel
- assistance with transfer of students/residents to be provided by the institution (if applicable)
- teach-out agreements that specify conditions of student transfer (if applicable)
- additional Accreditation Standards or aspects of the program that may be impacted during the teach-out

For each of the above sections:

- DESCRIBE CHANGES TAKING PLACE during the teach-out period. Include a description of resources available before and during the teach-out period; and an appraisal and analysis of the impact of changes in resources for the program.
- PROVIDE RELEVANT DOCUMENTATION to illustrate how the program will continue to comply with the Accreditation Standards throughout the teach-out period. For example, if faculty resources will be decreased, provide teaching schedules and faculty qualifications to demonstrate how adequate instruction will continue to be delivered.

The Commission has directed that program materials be submitted electronically through a secure CODA electronic submission portal or by email, solely. **Paper copies and/or electronic copies mailed to the Commission office will not be accepted.**

MECHANICS: The following guidelines must be observed when preparing your report. Electronic Submission Guidelines are available and **must be strictly followed.**

Failure to comply with these guidelines will constitute an incomplete report. Electronic Submission Guidelines are available on the CODA website at this link:

<http://www.ada.org/en/coda/policies-and-guidelines/electronic-submission-guidelines>

1. COVER PAGE -- Must include the following information:
 - a) name and address of the institution;
 - b) program title;
 - c) name, title, telephone number and e-mail address and signature of the program director;
 - d) name, title telephone number, e-mail address and signature of the department head/dean;
 - e) name, title telephone number, e-mail address and signature of the chief executive officer (president/provost/chancellor) of the institution.

The report must include a signed cover/verification page and must conform to the Commission's electronic submission guidelines.

2. DOCUMENTATION -- If documentation is extensive, include a LIST OF Supporting Documentation as a table of contents and in the text of the report, and include the actual items **in one (1) separate document that conforms to the electronic submission guidelines.**

Institutions/Programs are expected to follow Commission policy and procedure on privacy and data security, including those related to compliance with the Health Insurance Portability and Accountability Act (HIPAA). The Commission's statement on HIPAA, as well as the Privacy and Data Security Summary for Institutions/Programs (PDF), are found in the Policies/Guidelines section of the Commission's website at <http://www.ada.org/en/coda/policies-and-guidelines/hipaa/>. Programs that fail to comply with CODA's policy will be assessed an administrative fee of \$4000.

DEADLINES: Teach-Out Reports must be submitted to the Commission following the announcement of program discontinue or close. Following receipt of the institution's letter of intent to discontinue or close, the Commission will identify the deadline for submission of the Teach-Out Report.

POLICY ON MISSED DEADLINES: So that the Commission may conduct its accreditation program in an orderly fashion, all institutions offering programs accredited by the Commission are expected to adhere to deadlines for requests for program information. 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.

Revised: 2/16; Reaffirmed: 8/20; 8/15; 8/10, 7/07, 7/01, 5/88

POLICY ON PREPARATION AND SUBMISSION OF DOCUMENTS TO THE COMMISSION: All institutions offering programs accredited by the Commission are expected to prepare documents that adhere to guidelines set forth by the Commission on Dental Accreditation, including required verification signatures by the institution's chief executive officer, the institution's chief academic officer, and program director. These documents may include, but are not limited to, self-study, responses to site visit/progress reports, initial accreditation applications, reports of program change, and transfer of sponsorship and exhibits. The Commission's various guidelines for preparing and submitting documents, including electronic submission, can be found on the Commission's website or obtained from the Commission staff.

In addition, all institutions must meet established deadlines for submission of requested information. Any information that does not meet the preparation or submission guidelines or is received after the prescribed deadlines may be returned to the program, which could affect the accreditation status of the program.

Electronic Submission of Accreditation Materials: All institutions will provide the Commission with an electronic copy of all accreditation documents and related materials, which conform to the Commission's Electronic Submission Guidelines. Electronic submission guidelines can be found on the Commission's website or obtained from the Commission staff. Accreditation documents and related materials must be complete and comprehensive.

Documents that fail to adhere to the stated Guidelines for submission will not be accepted and the program will be contacted to submit a corrected document. In this case, documents may not be reviewed at the assigned time which may impact the program's accreditation status.

Compliance with Health Insurance Portability and Accountability Act (HIPAA) (Excerpt):

The program's documentation for CODA must not contain any patient protected health information (PHI) or sensitive personally identifiable information (PII). If the program submits documentation that does not comply with the policy on PHI or PII, CODA will assess an

administrative processing fee of \$4,000 per program submission to the institution; a program's resubmission that continues to contain PHI or PII will be assessed an additional \$4,000 administrative processing fee.

Revised: 8/20; Adopted 1/20 (Formerly Policy on Electronic Submission of Accreditation Materials, Commission Policy and Procedure Related to Compliance with the Health Insurance Portability and Accountability Act [HIPAA] and Policy on Preparation and Submission of Reports to the Commission)

ASSISTANCE: If you have questions, it is preferred that you contact staff via email. CODA staff emails can be found on the CODA website at the following link:

<https://www.ada.org/en/coda/accreditation/coda-membership/coda-staff>

Staff can also be contacted at the phone number and extension below: 312-440-(ext.)

- dental education programs and dental therapy programs, extension 2721;
- advanced dental education programs in dental public health, oral and maxillofacial pathology, oral and maxillofacial radiology, pediatric dentistry and prosthodontics, extension 2672;
- advanced dental education programs in endodontics, oral and maxillofacial surgery, orthodontics and dentofacial orthopedics and periodontics, and fellowships in oral and maxillofacial surgery and orthodontics and dentofacial orthopedics, extension 2714;
- advanced dental education programs in advanced education in general dentistry, general practice residency, dental anesthesiology, oral medicine and orofacial pain, extension 2788;
- dental assisting programs and dental laboratory technology programs, extension 4660; and
- dental hygiene programs, extension 2695

Commission on Dental Accreditation Privacy and Data Security Reminders

Protect sensitive personally identifiable information (“PII”) such as social security numbers, drivers’ license numbers, credit card numbers, account numbers, etc.

Security Reminder: Personally Identifiable Information

Before submitting any documents to CODA or to a CODA site visitor, an institution must:

- Review for PII and patient identifiers.
- Fully and appropriately redact any PII and patient identifiers.
- Make sure the redacted information is unreadable in hard copy and electronic form. You must use appropriate redaction methods to ensure personal information cannot be read or reconstructed.

CODA **does not accept** PII or patient identifiers in any materials submitted by a program.

Security Reminder: Patient Identifiers

Before submitting any information about a patient to CODA or to a CODA site visitor, you must **thoroughly redact all 18 patient identifiers listed on the next page.**

Examples of information about a patient:

- Dental records
- Rosters of procedures (procedure logs)
- Chart review records (chart audit records)
- Information from affiliated teaching institutions, to include items listed above
- Brochures with patient images and/or information
- Presentations with patient images and/or information
- Course materials (exams, lecture materials) with patient images and/or information

If **even one** identifier is readable, do not submit the information to CODA.

CODA **does not accept** documents containing PII or patient identifiers from institutions. Any PHI/PII that is necessary for CODA accreditation may only be reviewed by CODA site visitors when they are on-site at the institution.

When redacting identifiers, you must ensure that the information is unreadable and cannot be reconstructed in both hard copy and electronic form. For example, certain information redacted on a hard copy can become readable when the hard copy is scanned. Instead, it may be effective to use opaque cover-up tape on the hard copy, scan, and then ensure the redacted information on the scanned version is not visible/readable through the redaction.

Commission on Dental Accreditation
Privacy and Data Security Requirements for Institutions
(Rev. 2/22/19)

1. **Sensitive Information.** To protect the privacy of individuals and to comply with applicable law, the Commission on Dental Accreditation (“CODA” or “the Commission”) **prohibits all programs/institutions from disclosing in electronic or hard copy documents** provided to CODA other than on-site during a site visit, any of the following information (“Sensitive Information” or “PII”):
 - Social Security number
 - Credit or debit card number or other information (e.g., expiration date, security code)
 - Drivers’ license number
 - Account number with a pin or security code that permits access
 - Health insurance information, such as policy number or subscriber I.D.
 - Medical information, such as information about an individual’s condition or treatment
 - Mother’s maiden name
 - Taxpayer ID number
 - Date of birth
 - Any data protected by applicable law (e.g., HIPAA, state data security law)
 - Biometric data, such as fingerprint or retina image
 - Username or email address, in combination with a password or security question that permits access to an online account

2. **Patient Identifiers.** Before submitting information about a patient to CODA other than on-site during a site visit, a program/institution **must remove the following data elements** of the individual, and of relatives, household members, and employers of the individual (the “Patient Identifiers”):
 1. Names, including initials
 2. Address (including city, zip code, county, precinct)
 3. Dates, including treatment date, admission date, age, date of birth, or date of death [a range of dates (e.g., May 1 – 31, 2015) is permitted provided such range cannot be used to identify the individual who is the subject of the information]
 4. Telephone numbers
 5. Fax numbers
 6. E-mail addresses
 7. Social Security numbers
 8. Medical record numbers
 9. Health plan beneficiary numbers
 10. Account numbers
 11. Certificate/license numbers
 12. Vehicle identifiers and serial numbers, including license plate numbers
 13. Device identifiers and serial numbers

14. Web Universal Resource Locators (URLs)
15. Internet Protocol (IP) address numbers
16. Biometric identifiers (e.g., finger and voice prints)
17. Full face photographic images and comparable images
18. Any other unique identifying number, characteristic, or code:
 - that is derived from information about the individual
 - that is capable of being translated so as to identify the individual, or
 - if the mechanism for re-identification (e.g., the key) is also disclosed

In addition, the information provided to CODA cannot be capable of being used alone or in combination with other information to identify the individual.

3. **Redaction.** When removing any Sensitive Information or Patient Identifier from paper or electronic documents disclosed to CODA, programs/institutions shall **fully and appropriately** remove the data such that the data 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.
4. **Administrative fee.** *If the program/institution submits any documentation that does not comply with the directives noted above, CODA will assess an administrative fee of \$4000 to the program/institution; a resubmission that continues to contain prohibited data will be assessed an additional \$4000 fee.*
5.
 - CODA Site Visitors and Commission volunteers are only authorized to access Sensitive Information and Patient Identifiers:
 - Onsite during a site visit, and
 - That are necessary for conducting the accreditation site visit
 - CODA Site Visitors and Commission volunteers may not download or make hard copies or electronic copies of Sensitive Information or Patient Identifiers.

NOTE: If a document includes fictitious information, which may otherwise appear to be Sensitive Information or Patient Identifiers, the program is expected to clearly mark the document as “Fictitious Example”.