

**GUIDELINES FOR REPORTING ENROLLMENT INCREASES  
ADVANCED EDUCATION IN GENERAL DENTISTRY, GENERAL PRACTICE  
RESIDENCY, DENTAL ANESTHESIOLOGY, ORAL MEDICINE AND OROFACIAL  
PAIN PROGRAMS**

**CONSULTATION:** An advanced dental education program considering or planning an enrollment increase, or any other substantive change, should notify the Commission early in the program's planning. Such notification will provide an opportunity for the program to seek consultation from Commission staff regarding the potential effect of the proposed change on the accreditation status and the procedures to be followed.

Programs should be cognizant of the impending need for enrollment increases (e.g., additional training position, grant applications for program expansion) and *proactively* request permission for the increase.

Advanced education in general dentistry, general practice residency, dental anesthesiology, oral medicine, and orofacial pain do not have authorized enrollment, but must use these Guidelines to request an increase in enrollment prior to implementing the increase. Approval of an increase in enrollment in these advanced dental education programs must be reported to the Commission if the program's total enrollment increases beyond the enrollment at the last site visit or prior approval of enrollment increase. Upon submission of the program change report, a substantial increase in program enrollment as determined by preliminary review by the discipline-specific Review Committee Chair will require prior approval by CODA.

Requests for *retroactive permanent* increases in enrollment will not be considered. Requests for *retroactive temporary* increases in enrollment may be considered due to special circumstances on a case-by-case basis, including, but not limited to:

- Resident extending program length due to illness, parental leave, incomplete projects/clinical assignments, or concurrent enrollment in another program;
- Unexpected loss of an enrollee and need to maintain balance of manpower needs;
- Urgent manpower needs demanded by U.S. armed forces; and
- Natural disasters.

If a program has enrolled beyond the approved number of residents without prior approval by the Commission, the Commission may or may not retroactively approve the enrollment increase without a special focused site visit at the program's expense.

If the focused visit determines that the program does not have the resources to support the additional resident(s), the program will be placed on "intent to withdraw" status and no additional resident(s) beyond the previously approved number may be admitted to the program until the deficiencies have been rectified and approved by the Commission. Resident(s) who have already been formally accepted or enrolled in the program will be allowed to continue.

Programs are reminded that resources must be maintained even when the full complement of residents is not enrolled in the program.

**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 may be returned to the program for proper formatting. For each change in the program being reported:

1. DESCRIBE THE CHANGE briefly and as clearly as possible. Provide a chronology of events/circumstances leading to the change, if you believe that would be helpful. Include a description of the relevant aspects of the program BEFORE the change and AFTER the change illustrating the impact of the change on the program.

The report should address the following:

- Date the program plans to increase enrollment.
- The enrollment at the time of the most recent site visit.
- The current enrollment in the program. If the program has a second year, indicate the current enrollment in each year of the program, as well as the enrollment at the time the second year was approved.
- The proposed increase in enrollment and whether the increase is temporary or permanent.
- The reason for the increase.
- The ratio of attendings/teaching staff to residents before and after the proposed increase. Include clinic coverage schedule.
- A description of modifications to the didactic curriculum, if any.
- A resident schedule, including all rotations, following the proposed increase. The schedules should also indicate the clinic coverage assignments of the faculty.
- A description of how rotation directors/faculty will be informed of the enrollment increase.
- The number of and types of allied support staff available to residents after the proposed enrollment increase.
- Resources: operatories, resident work/study area, computer access, etc. Include chair assignments for when residents are in clinic. Include others who are assigned chairs (hygienists, faculty).
- A description of how it will be ensured that adequate financial resources are available to support the program expansion.
- A description of the availability of adequate patient experiences to ensure the program’s goals and objectives for residency training or competencies and proficiencies will continue to be achieved following the increased enrollment.
- Summative procedure logs for each resident from the previous year’s class. Logs should include details of the variety, type, quantity of cases treated, and the CDT procedure code. *Report should be sorted by resident and CDT procedure code.* Records of clinical activity must include records for *each resident* and must clearly identify residents, (e.g. Resident 1, Resident 2, etc.). ***All records must have patient identification removed and must comply with “Security Reminder: Patient Identifiers.”***

2. PROVIDE RELEVANT DOCUMENTATION to illustrate how the program will continue to comply with the accreditation standard(s). For example, if enrollment increased by a significant percentage, describe and document the resources that will allow the larger number of students to be provided with a quality education (e.g., additional faculty; the purchase of new equipment; copies of laboratory/clinic schedules).

**NOTE:** When deciding how to explain a change and selecting appropriate documentation, it may be helpful to use the following approach:

- a. Description: discuss BEFORE and AFTER the change;
- b. Appraisal and Analysis: assess the IMPACT of the change;
- c. Supportive Documentation: EVIDENCE that the program continues to meet the standards.

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.** The Commission requires one (1) report be submitted for each program affected following the Electronic Submission Guidelines. Failure to comply with these guidelines will constitute an incomplete report. Electronic Submission Guidelines are available on the CODA website at this link: <https://coda.ada.org/en/policies-and-guidelines/electronic-submission-guidelines>

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

**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*

<https://coda.ada.org/en/policies-and-guidelines/hipaa>. *Programs that fail to comply with CODA's policy will be assessed an administrative fee of \$4000.*

**DEADLINES:** Depending on the specific program change, reports **must** be submitted to the Commission no later than **May 1** for submission to the Summer meeting or **November 1** for submission to the Winter meeting (for reports that must be reviewed by the Review Committee and Commission) or at least thirty (30) days prior to the anticipated implementation of a change. Because of the above deadlines, program administrators should consult with Commission staff well in advance of an anticipated change in order to assess any potential impact of the anticipated change on the accreditation status of the program. If the report of change will be considered by a Review Committee and the Commission, the Commission acknowledgment will indicate the meeting date. Failure to adhere to established deadlines and/or comply with the policy will jeopardize the program's accreditation status.

**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://coda.ada.org/en/accreditation/coda-membership/coda-staff>

Staff can also be contacted at 312-440-2788.



## 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. 8/2021)

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, passport number, or other government issued ID
  - 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, treatment, or payment for health care
  - Mother’s maiden name
  - Taxpayer ID number
  - Full 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.*
  - 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”.**