

**COMMISSION ON DENTAL ACCREDITATION
GUIDELINES FOR REPORTING AN INTERRUPTION OF EDUCATION
DURING COVID-19**

K. POLICY ON INTERRUPTION OF EDUCATION

Interruption of an educational program due to unforeseen circumstances that take faculty, administrators or students away from the program is a potentially serious problem. If such interruption may compromise the quality and effectiveness of education, the Commission must be notified in writing of any such disruption. The institution must provide a comprehensive plan for how the loss of instructional time will be addressed. A program which experiences an interruption of longer than two (2) years will be notified of the Commission's intent to withdraw accreditation at its next scheduled meeting.

Revised: 8/15; 8/10, 5/91, 1975; Reaffirmed: 7/07, 7/01

The Commission recognizes that unexpected interruption of education has occurred as a result of sudden changes that compromise the program or facility resulting from COVID-19 that takes faculty, administrators or students away from the program. **The Commission must be notified in writing by no later than May 15, 2020.** The appropriate Review Committee and the Commission will review the program's written interruption of education report at the next scheduled meeting. In the event that waiting until the next meeting would preclude a timely review, the appropriate Review Committee(s) will review the interruption of education report in a telephone/web conference call(s). The action recommended by the Review Committee(s) will be forwarded to the Commission for mail ballot approval in this later case.

Modification of the program due to an interruption of education will be viewed by the Commission as a *temporary* solution to maintain educational quality and compliance with Accreditation Standards. Following the interruption of education, should the program subsequently decide to permanently implement a change, the program must submit a formal Report of Program Change for consideration by the Commission.

The following alternatives may be recommended by Review Committees and/or be taken by the Commission in relation to the review of reports of interruption of education received from accredited educational programs.

- *Approve the report of interruption of education:* If the Review Committee or Commission does not identify any concerns regarding the program's continued compliance with the accreditation standards, the transmittal letter should advise the institution that the change(s) related to interruption of education have been noted and will be reviewed at the next regularly-scheduled site visit to the program.
- *Approve the report of interruption of education and request additional information:* If the Review Committees or Commission does not identify any concerns regarding the program's compliance with the accreditation standards, but believes follow up reporting is required to ensure continued compliance with accreditation standards, additional information will be requested for review by the Commission. Additional information could occur through a supplemental report or a focused site visit,
- *Postpone action and continue the program's accreditation status, but request additional*

information on the interruption of education: The transmittal letter will inform the institution that the report of interruption of education has been considered, but that concerns regarding continued compliance with the accreditation standards have been identified. Additional specific information regarding the identified concerns will be requested for review by the Commission. The institution will be further advised that, if the additional information submitted does not satisfy the Commission regarding the identified concerns, the Commission reserves the right to request additional documentation, or conduct a special focused site visit of the program, or deny the report on interruption of education.

- *Postpone action and continue the program's accreditation status pending conduct of a special site visit related to the interruption of education:* If the information submitted with the interruption of education is insufficient to provide reasonable assurance that the accreditation standards will continue to be met, and the Commission believes that the necessary information can only be obtained on-site, a special focused site visit will be conducted.
- *Deny the report on interruption of education:* If the submitted information does not indicate that the program will continue to comply with the accreditation standards, the Commission will deny the report on interruption of education. The institutions will be advised that it must re-submit a report on interruption of education which provide a comprehensive plan for how the loss of instructional time will be addressed and continued compliance with accreditation standards will be maintained.

GUIDELINES FOR REPORTING AN INTERRUPTION OF EDUCATION

PURPOSE: A “report of interruption of education” informs the Commission that due to unforeseen circumstances there has been a disruption in the educational program that takes faculty, administrators or students away from the program (e.g. a natural disaster or similar event). **An interruption of education may have a direct and significant impact on the program’s potential ability to comply with the Accreditation Standards.** The institution must provide a comprehensive plan for how the loss of instructional time will be addressed. The institution’s/program’s plan must address, as applicable, any disruption to didactic, laboratory, preclinical, and/or clinical components of the educational program.

FORMAT FOR INTERRUPTION OF EDUCATION REPORT: The report must be **clear and concise** and must follow the “Format” and “Mechanics” illustrated within this guideline. **Reports related to the interruption of education, including appendices, may not exceed five (5) pages. An additional five (5) pages may be submitted to address Question 2a related to use of distance education.** Reports that fail to adhere to the stated guidelines may be returned to the program for proper formatting.

DOCUMENT THE INTERRUPTION OF EDUCATION as briefly, clearly and completely as possible. The following areas may have been impacted by the interruption of education. Prepare a report that lists all questions below (1 through 4, and all subparts) along with the program’s response to each item. Attach supporting documents, as necessary to demonstrate continued compliance with Commission Accreditation Standards. All areas must be addressed; if there has been no change in a particular area, indicate so in the program’s response.

- 1) Provide a chronology of events/circumstances leading to the interruption of education **and** the expected period of interruption of education (initial and expected end dates).
- 2) Describe specific temporary modifications to curriculum content, curriculum length, and/or sequence that have occurred **and** how the modifications will maintain compliance with CODA Accreditation Standards for the Class of 2020. At a minimum, address the following in your response.
 - a) Document specific changes made to the delivery method of educational curriculum in didactic, laboratory, preclinical or clinical portions of the program (for example, changes in traditional vs. distance education).
 - i. **For temporary use of distance education**, if not previously submitted, please submit the following:
 1. Outline the specific uses of distance education within the curriculum
 2. Document the methods by which the program will apply student identity verification to address the following:
 - a. Document how the identify of each student/resident who registers for the course is verified as the one who participates in, completes, and receives academic credit

- for the course.
- b. Document that the verification process used includes methods such as secure login and passcode, proctored examinations, and/or other technologies effective in verifying student/resident identity.
 - c. Document that the program provides a written statement to make it clear that the verification processes used are to protect student/resident privacy, and
 - d. Document how students/residents are notified of additional charges associated with the student identity verification at the time of registration or enrollment.
- b) Indicate what, if any, curricular content was eliminated or re-sequenced.
 - c) Indicate what, if any, area of curriculum length (course, rotation, or overall program length) was modified.
 - d) Describe how the program demonstrates continued compliance with CODA required curriculum content, course sequencing, and curricular length, as applicable.
 - e) Provide as an Exhibit the BEFORE and AFTER overall program course sequence, as applicable.
- 3) Describe specific temporary modifications to the laboratory, preclinical, and/or clinical portion of the program that have occurred **and** how the modifications will maintain compliance with CODA Accreditation Standards for the Class of 2020. At a minimum, address the following in your response.
- a) Document changes to the laboratory, preclinical, and/or clinical portion of the program and describe how the program demonstrates continued compliance with CODA Standards related to program and course requirements (i.e., changes in any program, course, or CODA-mandated educational requirements).
 - b) Document changes and describe how the program demonstrates continued compliance with CODA Accreditation Standards related to new or different evaluation, assessment, and/or grading methods have been employed due to the interruption of education. Describe the specific changes that were made and how the program complies with CODA Accreditation Standards related to assessment of student/resident competence.
- 4) Describe specific temporary modifications to the laboratory, preclinical, and/or clinical facilities used by the program **and** how the modifications will maintain compliance with CODA Accreditation Standards for the Class of 2020. If temporary facilities will be used, provide evidence of the facility capacity and student use schedule to ensure continued compliance with CODA Standards. Submit a signed affiliation agreement for the use of temporary facilities.

PROVIDE RELEVANT DOCUMENTATION to illustrate how the program will continue to comply with the accreditation standard(s). 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.

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.

MECHANICS: The following guidelines must be observed when preparing your report.
Electronic Submission Guidelines to assist in preparing a digitized copy of the report must be strictly followed.

1. **COVER PAGE** – **Must** include the following information:
 - a. name and address of the institution
 - b. program title;
 - c. name, title, telephone number, 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 of the institution (the chief executive officer of the institution sponsoring the program must be copied on the letter to the Commission).

The electronic copy must include a signed cover/verification page and must conform to the Commission's electronic submission guidelines. If, due to the nature of the interruption of education, the program is unable to obtain administrative signatures, the submission must at a minimum include evidence of distribution of the completed report to the program's institutional administration (e.g. carbon copy on email submission of report).

2. **DOCUMENTATION** – The report must be succinct and provide only the information necessary to fully address the questions noted above. See above related to page limitations.
3. **COPIES**--The Commission requires one (1) electronic copy be submitted for each program affected following the Electronic Submission Guidelines. (separate document). Failure to comply with these guidelines will constitute an incomplete report.

DEADLINES: The Commission must be notified in writing of an interruption of education as soon as possible following the event and no later than May 15, 2020. Because of the above deadlines, program administrators should consult with Commission staff immediately upon experiencing an interruption of education. If the report of interruption of education 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: 8/15; 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. 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 will be provided to programs. 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.

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: Call Commission staff if you have questions about your report. Staff are available to answer questions about report preparation and can be contacted on the toll-free number: 1-800/621-8099. **While Commission offices are closed, please contact CODA Staff by e-mail.**

- 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

Submission: **While Commission offices are closed, please submit reports by email as noted below.**

If emailing an electronic copy of the report, please send the information to the appropriate CODA manager. The email file size must not exceed 5MB. If multiple emails must be submitted, please indicate so by referring to "Email 1 of X" in the subject line of the email.

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.*
 - 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”.