Guidelines for Electronic Submission of Documents to the Commission on Dental Accreditation

The Commission on Dental Accreditation (CODA) requires that documents submitted for a program's permanent file be done so electronically through its Electronic Submission Portal (i.e. applications, self-study, and program reports larger than 5MB total size) or via email (i.e. program reports smaller than 5MB total size per email). These guidelines will assist you in preparing your report for electronic submission.

PREPARING THE DOCUMENTS

- Every effort should be made to ensure that the document is concise and contains only the information necessary to demonstrate compliance with the Accreditation Standards.
- The document(s) must adhere to CODA's Privacy and Data Security requirements (See Privacy and Data Security reminder at the end of this document).
    - If sample completed forms that contain fictitious patient information, fictitious patient identifiers (e.g., treatment date), or fictitious sensitive personal information are included, you must mark the document "fictitious sample." Otherwise, this could be identified as a violation of CODA policy.
    - Marketing brochures/documents, case studies, presentation materials or examinations and the like which include information that could appear to be identified as patient information, patient identifiers (e.g. patient photos) or sensitive personal information must be appropriately redacted unless that information is either (1) in the public domain or (2) used and disclosed in conformance with all applicable requirements for authorization or consent; otherwise, this could be identified as a violation of CODA policy. The submission of these types of documents is discouraged.
    - Do not submit completed clinical documents, completed clinical evaluations, or any document that may be deemed a patient record or contains identifiable patient information or patient identifiers, or other sensitive personal information about an individual (e.g., a patient or a student/resident/fellow or faculty member).
- Photographs should not be included unless absolutely necessary to support your compliance (i.e. photo of vacant facility only).
- Documents must be positioned so that they do not need to be rotated to view.
- **Web-based Information**: The Commission must retain a snapshot of the information presented at the time of the submission of the document. For this reason, the digitized report must not link to information on the Internet. To ensure the Commission retains the information as it existed at the time of submission, please insert or "embed," as images, all web-based information into the document.

PREPARING THE DOCUMENT FOR ELECTRONIC SUBMISSION

File Format
Please convert all program files to Adobe Portable Document Format (.pdf)

- All submissions must be <u>searchable and include bookmarks</u> to aid in the reader's navigation.

File Size

<u>Individual files submitted via the Electronic Submission Portal **must not exceed 100MB each**. It is highly recommended that you keep each file to less than **50MB**, as the larger the file, the longer it may take for that file to upload, depending on your internet upload speeds, etc.</u>

<u>For Self-Study and Application submissions</u>, the report could be saved as four (4) PDF documents that are clearly named, searchable and bookmarked:
- o Narrative
- o Exhibits
- o Appendices
- o Curriculum Materials
  - Allied and Predoctoral dental education programs must submit a separate curriculum document. Advanced dental education programs may include curriculum within the Exhibits or Appendices documents.

<u>For other types of correspondence and reports</u>, the report must be saved as one (1) comprehensive PDF document that is clearly named, searchable, bookmarked, and **does not exceed 100MB** in size for E-portal submission or **5MB** in size for email submission. If the file is larger than 100MB, it must be saved as smaller files; however, as a general practice, it is highly recommended that you keep each file to less than 50MB.

<u>NOTE</u>: If the Commission office cannot successfully transfer your document to the program's permanent record, the program will be contacted and required to upload documents that are a smaller file size.

File Name
- File names <u>must not</u> include symbols (such as &, /, *, #). In addition, file names must not be more than 30 characters in length.

DOCUMENT PREPARATION
Use your preferred PDF program to **add bookmarks** to make it easy to navigate your submission. The organization of your bookmarks must correlate to each Standard (1-1, 1-2, 1-3, etc.) and each exhibit/appendix/syllabi (exhibit 1, 2, 3, etc.) such that the reader can navigate directly to those sections of the report.

<u>Please keep in mind:</u> CODA staff and volunteers must be able to easily navigate throughout all of your submitted materials; use page numbers and bookmarks wisely in order to assist their review.

Reports that fail to adhere to the stated guidelines will not be accepted and the program will be contacted to submit a reformatted report. In this case, the report may not be reviewed at the assigned time.

ELECTRONIC SUBMISSION OF DOCUMENTS

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.

In addition, it is prohibited to use peer-to-peer file sharing software, such as Dropbox, Kazaa, Morpheus, LimeWare, Bit Torrent, etc., to transmit the documents to CODA or CODA volunteers.

E-Portal Submission: Application and self-study materials must only be submitted via CODA's electronic portal. You will receive portal access by contacting the Commission office.

Email Submission: If submitting a report **by email**, the email file size **must not exceed 5MB**. If multiple emails must be submitted (not to exceed 3 emails, total), please indicate so by referring to "Email 1 of X" in the subject line of the email. If your submission will require four (4) or more emails, please contact the Commission office to determine whether submission through CODA's electronic portal is preferred. The Commission is unable to receive "Zip Files."

PRIVACY AND DATA SECURITY REMINDER

The program's documentation for CODA (self-study, application, or reports to CODA, for example) must NOT contain any sensitive personally identifiable information ("Sensitive Information" or "PII") as outlined in "Privacy and Data Security Requirements for Institutions" (see section at the end of this document). Similarly, such documentation must not contain any identifiable patient information ("PHI"); therefore, no "patient identifiers" may be included (see section at the end of this document). This applies whether or not the program is required to comply with HIPAA.

Before sending documents to CODA, institutions must fully and appropriately redact all PII and all PHI, including all patient identifiers such that the PII/PHI and patient identifiers cannot be read or otherwise reconstructed. *Covering information with ink and then scanning is not an appropriate means of redaction.*

If the program submits documentation that does not comply with the policy on PHI and PII (noted above), CODA will assess an administrative 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 fee.

Documents that fail to adhere to the Commission's Privacy and Data Security compliance requirements will be destroyed and corrected documents must be submitted.

ASSISTANCE
If you have questions, it is preferred that you contact CODA 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 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 Discipline Abbreviations

DE – Predoctoral Dental Education
AEGD – Advanced Education in General Dentistry Education
GPR – General Practice Residency Education
Dent Anes – Dental Anesthesiology
OF Pain – Orofacial Pain
Oral Med – Oral Medicine
DA – Dental Assisting Education
DH – Dental Hygiene Education
DT – Dental Therapy Education
DLT – Dental Laboratory Technology Education
DPH – Dental Public Health Education
ENDO – Endodontics Education
OMP – Oral and Maxillofacial Pathology Education
OMR – Oral and Maxillofacial Radiology Education
OMS – Oral and Maxillofacial Surgery Education
OMS-CF COS – Oral and Maxillofacial Surgery Clinical Fellowship Education – Cosmetics

OMS-CF CR – Oral and Maxillofacial Surgery Clinical Fellowship Education – Craniofacial (Pediatric Craniomaxillofacial)

OMS-CF ES – Oral and Maxillofacial Surgery Clinical Fellowship Education – Endoscopic Maxillofacial Surgery

OMS-CF MIC – Oral and Maxillofacial Surgery Clinical Fellowship Education – Microvascular Reconstructive Surgery

OMS-CF ONC – Oral and Maxillofacial Surgery Clinical Fellowship Education - Oncology

ORTHO – Orthodontics and Dentofacial Orthopedics Education

ORTHO-CF – Clinical Fellowship Education in Craniofacial and Special Care Orthodontics

PED – Pediatric Dentistry Education

PERIO – Periodontics Education

PROS – Prosthodontics Education

CBMXPROS - Combined Prosthodontics/Maxillofacial Prosthetics

MXPROS - Maxillofacial Prosthetics

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

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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".

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