

**Commission on Dental Accreditation**  
**Privacy and Data Security Requirements for Institutions**  
(Rev. 11/16/2023)

1. **Sensitive Personal 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 Personal Information” or “SPI”):
  - Social Security number
  - Credit or debit card information (number, expiration date, or security code)
  - Drivers’ license number, passport number, or other government issued ID number
  - Financial account number
  - 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.** Protected Health Information (PHI), including Patient Identifiers, may only be viewed by CODA or its volunteers on-site during a site visit. Programs must not submit PHI in any form to the Commission office or Commission volunteers. Before submitting information to the Commission, a program/institution **must remove the following data elements** of any individual patient, and of relatives, household members, and employers of the individual (the “Patient Identifiers”):
  1. Names, including initials
  2. Address (including street address, city, zip code, county, precinct)
  3. Dates, including treatment date, admission date, age over 89 or any elements of dates (including year) indicative of such age, date of birth, or date of death [a range of dates (e.g., May 1 – 31, 2021) 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 to the items above, 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 submits any documentation that does not comply with the directives noted above, CODA will assess an administrative fee of \$4000 per program submission to the institution; a program's resubmission that continues to contain prohibited data will be assessed an additional \$4000 fee.*
  - Programs/Institutions may only provide access, and CODA Site Visitors and Commission volunteers are only authorized to access, Sensitive Information and Patient Identifiers:
    - On-site 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 must clearly mark the document as "Fictitious Example".**