

## COMMISSION ON DENTAL ACCREDITATION

### POLICY ON TEMPORARY USE OF ALTERNATIVE SITE VISIT METHODS

On March 13, 2020, a national emergency was declared due to the COVID-19 pandemic. As a result of the continued impact on travel, the Commission on Dental Accreditation (CODA) has determined temporary use of alternative site visit (i.e., virtual or hybrid site visit) methods may be necessary to fulfill the Commission's obligation to conduct accreditation site visits to programs that are currently accredited by, or apply for accreditation by, the Commission. The term of this policy shall be in effect upon CODA approval and until the termination date of the temporary flexibility granted through the United States Department of Education.

Alternative site visit methods *may be used* to conduct site visits to U.S.-based dental education programs seeking accreditation (applicant programs) as well as regular reaccreditation and special focused site visits, as applicable. The conduct of a site visit using alternative methods will be based on travel, health and safety concerns and/or restrictions in the geographic location(s) that may be visited by the Commission's staff and volunteers, or for other reasons deemed appropriate by the Commission during the pandemic (for example, institutional, local, state, or federal directives).

Alternative site visit methods *may not be used* for any portion of the international accreditation process, including but not limited to the CODA Preliminary Accreditation Consultation Visit (PACV) process and the CODA predoctoral dental education international accreditation process.

Alternative site visits may be entirely virtual (all site visitors remote), or hybrid (at least one (1) on-site Commission site visitor in the discipline), as determined by the Commission in consultation with the program and site visit committee, and subject to the Commission's final decision.

- Virtual site visits will require an on-site visit by a Commission site visit team (with 1-2 team members and, as necessary, Commission staff), as dictated by the Commission. The on-site visit to the educational program will occur within a reasonable amount of time following the conduct of a virtual site visit unless cause exists to conduct the visit earlier, subject to CODA's site visit schedule and ongoing health, safety, and/or travel concerns and/or restrictions. During the in-person visit, the Commission reserves the right to review the portions of the program that could not be completed virtually (e.g. facility tours, clinic observations, educational activity site tours, confidential document reviews, patient record reviews, etc.) and any areas in which concerns were raised during the virtual site visit, or other standards, policies and/or procedures that may arise during the course of the in-person site visit.
- Hybrid site visits will be structured to include all components of the site visit process, with both virtual and on-site review of the program by Commission site visitors. As such, the Commission will view the hybrid site visit as equivalent to an on-site visit, with no secondary visit required based solely upon the methodology used to conduct the site visit.
- Following the virtual (followed by a later on-site visit) or hybrid site visit, the program's next regular reaccreditation on-site visit will be scheduled seven (7) years following the date of the virtual or hybrid site visit in all disciplines except oral and maxillofacial

surgery (residency and fellowship), which will be scheduled five (5) years following the date of the virtual or hybrid site visit. The Commission reserves the right to conduct an earlier visit to the program in accordance with Commission policies and procedures (e.g. special focused site visit, pre-graduation site visit).

Generally, for all alternative site visit methods, the Commission's current policy and procedure related to the conduct of a site visit and Commission review of site visit reports, progress reports, and other due process noted in the Evaluation and Operational Policies and Procedures will apply.

The following principles apply to the temporary use of alternative site visit methods:

- The program will be issued a preliminary draft site visit report following the site visit, regardless of site visit format, in accordance with Commission policy. The preliminary draft site visit report will be provided to the Commission along with the program's response, should one be submitted, and the Commission will make an accreditation decision based on this report.
- When Accreditation Standards are revised during the period in which the program is submitting progress reports for either the virtual, hybrid or in-person site visit, the program will be responsible for demonstrating compliance with the new standards. Further, identification of new deficiencies during the reporting time period will not result in a modification of the specified deadline for compliance with prior deficiencies.
- In order to conduct a virtual or hybrid site visit, the program being site visited must host the visit using their meeting technology (Zoom is preferred). If the program cannot comply with technological support, the site visit will be delayed and the program must submit a formal request for extension of accreditation using the Report of Program Change, which will be considered by the Commission at its next regular meeting.
- All virtual/hybrid site visits will be conducted using the time zone of the program being visited, documenting all time zones using CODA's site visit schedule template.
- Audio and/or video recording of the site visit is strictly prohibited.
- The Commission will dictate the portions of a site visit that will be conducted using alternative site visit methods.
  - The following applies to the conduct of a **virtual-only site visit**:
    - The Commission and its site visit team will dictate the final schedule of the site visit.
    - Tours of vacant facilities may be conducted virtually. However, all clinical observations and tours that may involve access to patients, will be conducted on-site only.
    - All program information must be provided to the site visitors in aggregate form and must conform to CODA's privacy and data security policy. Documents that include Protected Health Information (PHI), Personally Identifiable Information (PII), FERPA or other confidential records will not be reviewed virtually.
    - Student/Resident/Fellow interviews will be conducted virtually
    - All typical "on-site documentation" will be provided to the site visit committee and Commission in advance of the site visit, and must be limited to the essential documents to demonstrate a program's compliance. The on-site documents will be uploaded to CODA's electronic accreditation portal along with the program's self-study. Following the

- site visit, the program’s “on-site documentation” will be securely destroyed and will not be retained in the program’s accreditation file, unless necessary to document a site visit finding.
- The following applies to the conduct of a **hybrid site visit**:
    - The Commission and its site visit team will dictate the final schedule of the site visit.
    - All clinical observations and tours that may involve access to patients, will be conducted by the on-site visitor only. Tours of vacant facilities may be conducted virtually for the entire visiting committee.
    - All program information must be provided to the site visitors in aggregate form and must conform to CODA’s privacy and data security policy. Documents that include Protected Health Information (PHI), Personally Identifiable Information (PII), FERPA or other confidential records will be reviewed on-site only.
    - Student/Resident/Fellow interviews will be conducted virtually and on-site.
    - All typical “on-site documentation” will be provided to the site visit committee and Commission in advance of the site visit, and must be limited to the essential documents to demonstrate a program’s compliance. The on-site documents will be uploaded to CODA’s electronic accreditation portal along with the program’s self-study. Following the site visit, the program’s “on-site documentation” will be securely destroyed and will not be retained in the program’s accreditation file, unless necessary to document a site visit finding.

The following protocol will be applied to the in-person site visit following a virtual site visit:

- Virtual Regular Site Visit – A program that conducted its regular (5 or 7 year cycle) site visit virtually will have an on-site visit within a reasonable amount of time.
- Virtual Special Focused Site Visit – Since this type of site visit involves a special situation and does not alter the date of the program’s regular site visit, there will be no requirement to conduct the in-person site visit unless the Commission deems necessary.
- Virtual New Program (Application) Site Visit:
  - Developing Program – A developing program’s pre-enrollment site visit will be followed by a pre-graduation site visit. Additionally, programs that are four years in length are required to have a mid-initial accreditation site visit. Given the next site visit to a developing program will occur at the pre-graduation or mid-initial accreditation stage, there will be no requirement to conduct the in-person new program site visit unless the Commission deems necessary.
  - Fully Operational Program – A fully operational program will engage in a regular site visit and, if granted accreditation, will be placed on a regular site visit cycle (5 or 7 year cycle). Given the new program site visit conducted virtually and timeline for the next visit could be 5 to 7 years, this type of program will have an on-site visit within a reasonable amount of time.

To ensure continuity of the review, one (1) site visitor who attended the virtual site visit to a single discipline should conduct the on-site follow-up visit. If two (2) or more programs were virtually visited at an institution, the team could consist of two (2) site visitors, total, representing

at least two (2) disciplines. The final team composition for the on-site follow-up will be dictated by the Commission and may also include a virtual Commission staff.

The in-person follow-up visit will focus on the areas of the site visit that may have been difficult to accomplish virtually. A template schedule will be developed to include the following components for all follow-up in-person site visits: 1) introduction to the visit; 2) tour of facilities (including educational activity sites, as needed); 3) clinical observations; 4) program records review related to items that could not be fully reviewed virtually (confidential document reviews, patient record reviews, etc.); and 5) review of the program's progress on areas of noncompliance cited during the virtual site visit. Related to areas of noncompliance cited during the virtual site visit, it will be the Commission, through review of the program's ongoing progress reports and the findings of the on-site visit, which will determine the program's compliance. Additionally, while not the focus of the in-person follow-up visit, if compliance concerns arise regarding additional Standards beyond those cited during the virtual site visit, the site visitor(s) will review the program's compliance in these areas.

A template Site Visit Schedule and template Site Visitor Evaluation Report specific to the on-site visit process following a virtual site visit will be provided through the Commission office.

Revised: 2/22; Adopted February 12, 2021