

Welcome to the CODA Program Director 101

American Dental Education Association
Annual Meeting
March 9, 2024

Welcome and Introductions

- Welcome to the Commission on Dental Accreditation's Program Director 101, we are happy that you joined us.
- Introductions:
 - CODA Staff
 - CODA Leadership and Members, as available

Ground Rules for CODA Session

- CODA staff are here to provide information and address questions of a general nature related to CODA and your role as a program director.
- Please keep in mind that you are here with many other colleagues; therefore, your questions should be of a general nature so that your confidential program information is not shared publicly.
- Direct program-specific questions to CODA staff via email.

What We'll Discuss....

- Your Role as Program Director
- Accreditation Activities for the Program Director
- The Accreditation Standards
- Policies and Guidelines
- Online Resources and Staff Contacts
- Q&A, as time permits

Your Role as Program Director

Your Role as Program Director

- You are the primary point of contact with CODA
 - The **CEO, CAO/Dean/Academic Dean, and Program Director** are the only points of contact with whom CODA staff will communicate
- You are the gatekeeper for compliance with CODA Standards and Policies
- You are the guardian of program information

Your Role as Program Director

- Read everything you receive from CODA – instructions for response to CODA communications and answers to most questions are on **CODA's website** and in CODA communications
- Retain all CODA communications for the program's records
 - The program director must retain accreditation records (it's a Standard in some disciplines)

Your Role as Program Director

- Ensure you receive all CODA communications (check SPAM filters)
- Ensure you understand CODA's Evaluation and Operational Policies and Procedures
- Ensure you adhere to deadlines and communicate with CODA in a timely fashion

Your Role as Program Director

- **Do your homework** – please review policies and guidelines before contacting CODA with questions
 - This will save you time, as a majority of questions are answered within CODA materials
- **Complete all your work** – ensure you provide complete reports that adhere to guidelines and policy requirements
 - This will save you time, as incomplete reports will not be accepted

Your Role of Program Director

- **Know CODA's Deadlines** - deadlines are important, you must adhere to them
 - **Annual Fee** – March Annually
 - **Annual Survey** – Summer/Fall Annually
 - **Program Change Reports** – May 1 and November 1 for reports reviewed by CODA; or 30 days prior to change (see Policy)
 - **Self-Study** – 60 Days Prior to the Site Visit (via E-Portal)
 - **Transmittal Letters** – Due Dates and Requested Information detailed in the letter – *Review Carefully*

CODA Activities for the Program Director

CODA Annual Accreditation Fees

CODA Program Fees:

<https://coda.ada.org/site-visitor-resources/coda-fee-schedule>

Annual fees and application fees:

- 2024, 0% increase in annual fees
- 2025, 2% increase in annual fees
- Annual administrative fund fee:
 - 2024, waived
 - 2025, waived
- During the year a program is due for a regular accreditation site visit, the annual fee will be doubled.

Note – Annual Fees statements are distributed mid-March.

CODA Annual Survey

- Conducted Summer/Fall each year
- Required to maintain accreditation
 - Serves as continuous monitoring mechanism
- Must be completed by deadline, even when non-enrolling or in the year of a site visit
- Serves as background (5-year Data Profile) for site visit
- Compilation reports posted to website
<https://coda.ada.org/find-a-program>

Changes in Administration

- Changes in **Program Director, CAO and CEO** must be reported **at least 30 days in advance** of the change. Unexpected changes must be reported **no later than 30 days** following the change.
 - **CAO and CEO** changes can be reported by email with new administrator's full contact information (no biosketch needed, unless it's a dental dean)
 - **Program Director** change requires a formal letter from administration and the biosketch of new director (and other information per Standards)

CODA Meeting Cycles

- Winter Meeting (January/February)
 - Report deadline of November 1
 - Site Visits from May 1 through October 31
 - Other deadlines directed by CODA for follow-up
- Summer Meeting (July/August)
 - Report deadline of May 1
 - Site Visits from November 1 through April 30
 - Other deadlines directed by CODA for follow-up

Communicating with CODA

- CODA expects all communications (and program materials) to be submitted electronically via **E-mail (general correspondence)** or the **E-Portal (self-study)**
- Do not send CODA reports via Postal Mail
- Email is a great communication tool
- Phone is another good way to reach CODA staff

Understanding the Accreditation Statuses

- Approval without Reporting Requirements
- Approval with Reporting Requirements
 - Evidence of compliance with the cited standard(s) or policies must be demonstrated within a timeframe not to exceed eighteen (18) months if the program is between one and two years in length or two years if the program is at least two years in length.
- Intent to Withdraw
- Discontinued
- Withdraw*
- Deny*

*Adverse Action

The Accreditation Standards

Accreditation Standards

<https://coda.ada.org/standards>

- Know the Standards for your discipline
- Monitor proposed revisions, and provide comment
- Use the **current** version of Standards
- “MUST” – this is the requirement
- “Intent” – provides the reason for Standards
- “Examples of Evidence” – provides examples to demonstrate compliance

Why Stay Informed on Standards Revisions?

- **It is the program's obligation to stay up-to-date on the Standards for compliance.**
- A program's compliance is evaluated with the **current Accreditation Standards** (“must” statements) that have been **adopted and implemented**.
- Programs may need to modify the self-study if standards have been implemented during the self-study development process.
- Identification of new deficiencies during the reporting time period will not result in a modification (extension) of the specified deadline for compliance with prior deficiencies.

How to Stay Informed on Standards Revisions

- CODA helps you stay current by **emailing you notifications** [e.g., “CODA Communicator,” “CODA Alert,” emails to a specific set(s) of program directors, communities of interest]
- CODA conducts **workshops** and posts materials to its website
- Please access the **CODA website** periodically

Past and Future Validity and Reliability Studies of the Standards

Spring 2021 (delayed from 2020)

- Predoctoral Dental Education
- Oral and Maxillofacial Pathology

Spring 2021

- Dental Anesthesiology

Spring 2022

- Prosthodontics
- Orofacial Pain
- AEGD
- GPR
- Dental Public Health

2024

- Dental Assisting
- Oral Medicine
- Oral and Maxillofacial Radiology

2025

- Dental Therapy
- Oral and Maxillofacial Surgery
Clinical Fellowship

Revised Standards

- **January 1, 2023 implementation**
 - Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics (V&R)
 - Periodontics (V&R)

- **July 1, 2023 implementation**
 - Accreditation Standards for Advanced Dental Education Programs in Dental Public Health
 - Accreditation Standards for Advanced Dental Education Programs in Dental Anesthesiology

Revised Standards

- **August 11, 2023 implementation**
 - Accreditation Standards for Dental Assisting Education Programs (Standards 2-7 and 3-6)
- **July 1, 2024 implementation**
 - Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology (new Standard 4-16)
 - Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain (new Standard 2-10)
 - Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain (V&R)

Revised Standards

- **January 1, 2025 implementation**
 - Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (revised anesthesia standards)
- **July 1, 2025 implementation**
 - Accreditation Standards for Advanced Dental Education Programs in Dental Public Health (V&R)

Proposed Standards: Comments Due

<https://coda.ada.org/accreditation/open-hearings-comments-due>

Comment Due June 1, 2024:

- All Advanced Dental Education Discipline Standards (related to program sponsor and authority to operate)
- Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Surgery (Residency) (related to various standards)

Proposed Standards: Comments Due

<https://coda.ada.org/accreditation/open-hearings-comments-due>

Comment Due June 1, 2024 (as directed at CODA's Winter 2024 meeting):

- Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry (related to the optional second year for residency programs)
- Accreditation Standards for Advanced Dental Education Programs in General Practice Residency (related to the optional second year for residency programs)
- Accreditation Standards for Advanced Dental Education Programs in Endodontics (related to program director full-time status)

Proposed Standards: Comment Portal

Written comments will only be received through the CODA electronic comment portal.

Each Standards revision has its own unique comment portal.

<https://coda.ada.org/accreditation/open-hearings-comments-due>

Upcoming Event: Hearing on Standards

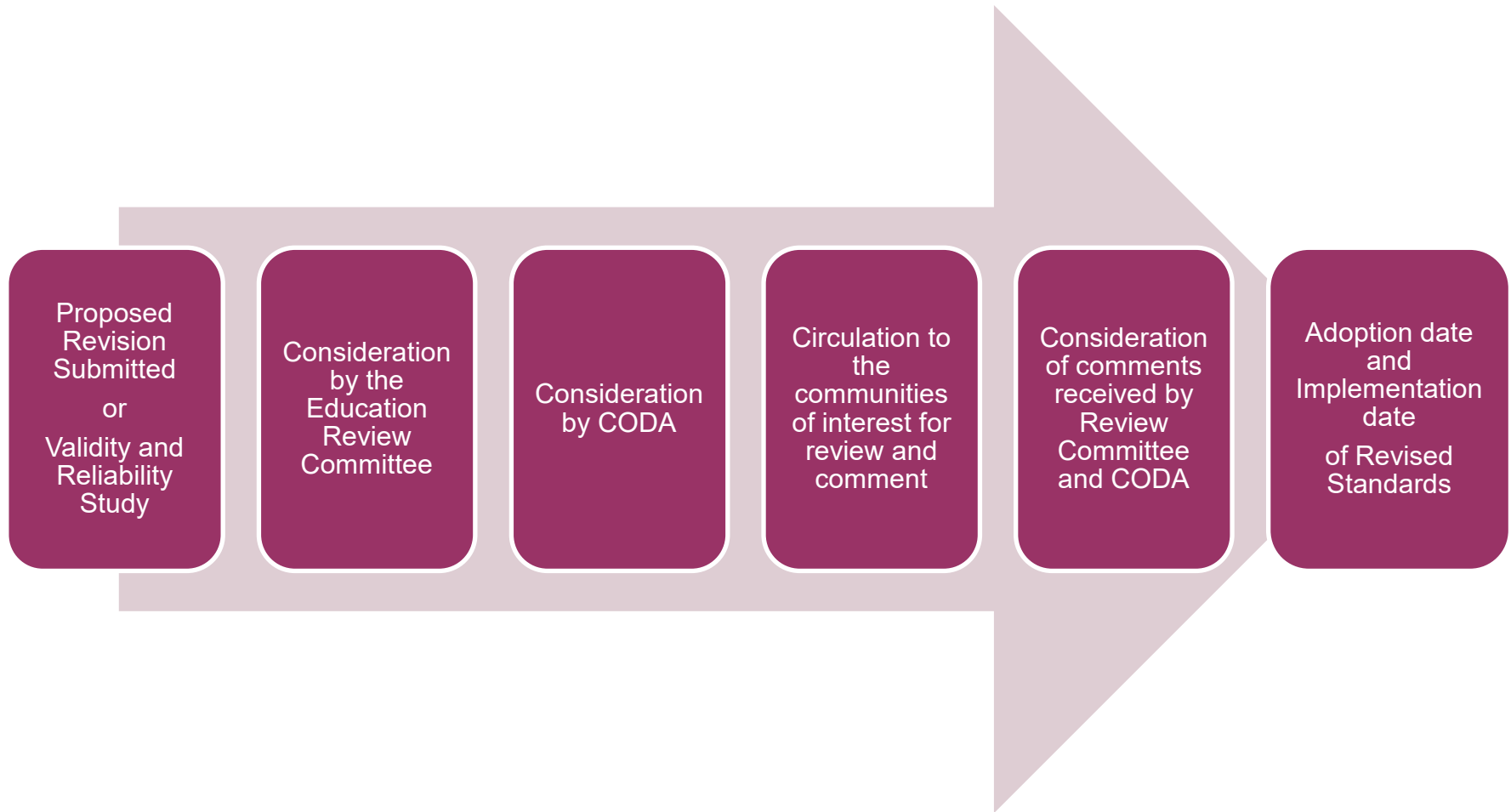
Thursday, March 21, 2024

5:00pm – 6:00pm Central Time

Registration Required:

<https://coda.ada.org/accreditation/open-hearings-comments-due>

Standards Revision Process



Frequency of Citings

- Developed annually, each summer.
- Compilation report of all standards cited during the period of implementation of Standards.
- Reference for program, especially at time of site visit.

<https://coda.ada.org/site-visits/coda-dds-dmd-site-visits/dds-dmd-site-visit-documents>

Self-Study Guide (For a Site Visit)

- A document **prepared by the program** based on the current Accreditation Standards
- A **self-assessment** that guides the on-site evaluation during a site visit
- Prepared and **submitted 60 days prior to a site visit** (start working on this document 1-2 years in advance)
- Follow submission guidelines (must have page numbers, hyperlinks within document, bookmarks)
- Look at prior correspondence to help write the Self-Study

The Self-Study Process is NOT:

- Simply a compilation of quantitative or qualitative data.
- Answers to a questionnaire or a check-off sheet.
- A simple narrative description of the program.
- Written exclusively by a consultant or an assigned administrator or faculty member.

Self-Study Format and Mechanics

- Answer all Policy sections at the beginning of the Self-Study
- Retain all listed Standards and Questions, and answer every question
- Use CODA's provided Example Exhibits
- Consider using different font or font color to draw reader's attention
- Be comprehensive but concise (provide sufficient documentation in the self-study)

Policies and Guidelines

Commission Policies and Procedures

- **Policies and Procedures**
 - Evaluation and Operational Policies and Procedures Manual (EOPP), including
 - Reporting Program Changes
 - Educational Activity Sites
 - Enrollment Increase
 - Distance Education
 - Complaint Policy
 - Others

<https://coda.ada.org/policies-and-guidelines>

Evaluation and Operational Policies and Procedures (EOPP)

- Evaluation and Operational Policies and Procedures (EOPP)
 - Redline copy of changes posted after each CODA meeting (Winter and Summer)
- EOPP is the Program Director's resource to CODA Policy and Procedures
 - Review policy before contacting CODA

Policy and Procedure Revisions (Winter 2022)

- **Due Dates for Submission of Program Reports*** to CODA
 - All reports to CODA (e.g. program change, enrollment increase, educational activity sites, etc.) must be submitted by **May 1 or November 1** if going to be reviewed at a CODA meeting.
 - Reports that may not require formal CODA review must be submitted **30 days prior to the change.**
 - Unexpected changes must be submitted **no later than 30 days following the change.**
- *Contact CODA staff if guidance needed.

Guidelines for Reporting to CODA

<https://coda.ada.org/policies-and-guidelines/program-changes-deadlines-and-other-report-guidelines>

Guidelines must be used for reports to CODA; where specialized guidelines exist, they must be used and all components addressed.

Reporting Program Change	Interruption of Education
Use of Distance Education	Use of Sites Where Educational Activity Occurs
Enrollment Increases	Preparation of Reports (response to site visit and progress reports)
Transfer of Sponsorship	Teach-Out
Biosketch Template (including Allied Biosketch template)	Administrator Verification Page

Reporting Program Changes

- **All program changes that could affect the ability of the program to comply with the Accreditation Standards must be reported to the Commission**
 - Some changes must be reported and pre-approved by CODA through a formal meeting review
 - Some changes must be reported at least 30 days prior to anticipated implementation (such as Program Director changes that comply with all program director qualification requirements) and are reviewed at the next site visit
- **Reporting on the Annual Survey does not preclude the requirement to report directly to CODA**
- Programs should contact CODA staff for guidance and review program change policy for more information

Examples of Program Changes that Need Prior Commission Approval

- Establishment of Off-Campus Sites not owned by the sponsoring institution used to meet accreditation standards or program requirements (See Guidelines on Reporting and Approval of Sites Where Educational Activity Occurs);
- Changes to Off-Campus Sites that impact the use of the site (e.g. minor site to major site, or termination of enrollment at or discontinued use of major site);
- Transfer of sponsorship from one institution to another;
- Changes in institutional accreditor or pending or final adverse actions. (See Policy on Regard For Decisions of States and Other Accrediting Agencies);
- Moving a program from one geographic site to another, including but not limited to geographic moves within the same institution;
- Program director qualifications not in compliance with the standards. In lieu of a CV, a copy of the new or acting program director's completed BioSketch must be provided to Commission staff. Contact Commission Staff for the BioSketch template.

Examples of Program Changes that Need Prior Commission Approval (continued)

- Substantial increase in program enrollment as determined by preliminary review by the discipline-specific Review Committee Chair.
 - 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. Programs are reminded that resources must be maintained even when the full complement of students/residents is not enrolled in the program. (see Policy on Enrollment Increases In Advanced Dental Education Programs and Predoctoral programs see Guidelines for Requesting an Increase in Enrollment in a Predoctoral Dental Education Program);
- Change in the nature of the program's financial support that could affect the ability of the program to meet the standards;
- Curriculum changes that could affect the ability of the program to meet the standards;
- Reduction in faculty or support staff time commitment that could affect the ability of the program to meet the standards;
- Change in the required length of the program;

Examples of Program Changes that Need Prior Commission Approval (continued)

- Reduction of program dental facilities that could affect the ability of the program to meet the standards;
- Addition of advanced standing opportunity, part-time track or multi-degree track, or other track offerings;
- Expansion of a developing dental hygiene or assisting program which will only be considered after the program has demonstrated success by graduating the first class, measured outcomes of the academic program, and received approval without reporting requirements; and/or
- Implementation of changes in the use of distance education that could affect the ability of the program to meet the standards (see reporting requirements found in the Policy on Distance Education).

Guidelines to Report a Program Change

- Step 1 – Review and Download Guidelines
<https://coda.ada.org/policies-and-guidelines/program-changes-deadlines-and-other-report-guidelines>
- Step 2 – Identify if the Change is Reportable (contact CODA Staff for guidance)
- Step 3 – Prepare your Program Change Report
 - Create your own document (i.e., remove CODA instructions)
 - Provide introductory paragraph(s) describing the program change.

Guidelines to Report a Program Change

- Step 3 – Prepare your Program Change Report (cont.)
 - Provide a chronology of events leading to the change.
 - Describe the program BEFORE and AFTER the change.
 - Appraise the impact of the change on the program:
 - Address adequate resources such as financial, faculty, facilities, curriculum, etc. to support the change.
 - Provide relevant documentation demonstrating the program continues to comply with the Accreditation Standard(s).

Guidelines to Report a Program Change

- Step 4 – Develop the Signed Verification Page (ensure it matches the current report)
- Step 5 – Ensure the electronic document is readable, navigable, bookmarked, etc.
- Step 6 – Submit to the CODA Manager and Support Staff by May 1 or November 1.

A Final Note on Program Change Reports

- Remember, some reports do not require formal CODA review and may be acknowledged by CODA staff for **review at the next site visit**.
- **Do not assume** that this acknowledgement means that CODA “approved” a program change.
- The program’s compliance **will be fully assessed at the site visit**, as noted in the CODA acknowledgement letter.

Reporting Educational Activity Sites

Major and Minor sites are used to meet a program requirement or accreditation standards.

- **Major Activity Sites:**
 - A site used for “competency assessment or comparable summative assessments” is a major site.
- **Minor Activity Sites:**
 - A site used for “no competency assessment or comparable summative assessments” is a minor site. Though other evaluations (daily evaluation, for example) may occur.

Reporting Educational Activity Sites (continued)

Reporting Requirements:

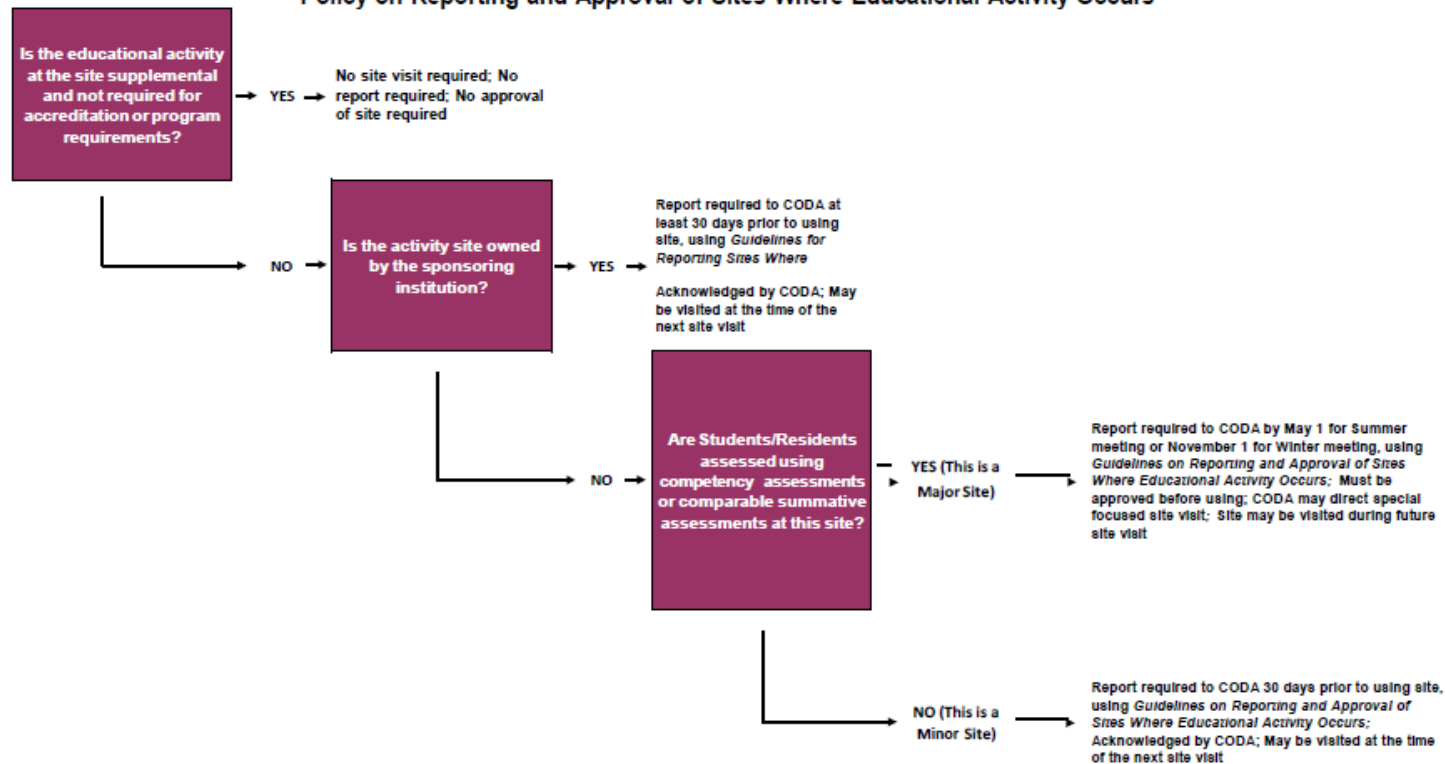
- The Commission must be informed when a program plans to initiate educational experiences in new settings and locations.
- Off-Campus training sites that are owned by the sponsoring institution or where the sponsoring organization has legal responsibility and operational oversight do not need prior approval before utilization but must be reported to the Commission in accordance with the Policy on Reporting Program Changes in Accredited Programs.
- Sites (whether major or minor) will be reviewed by CODA if the change could impact the program's ability to comply with Standards.

Reporting Educational Activity Sites (continued)

- Supplemental Activity Site
 - Site is optional and student/resident/fellow has a choice to attend or not and are not used to fulfill program requirements or accreditation standards (e.g., volunteer mission trips, health fairs). **These sites are outside of the educational program.**
- During regular site visit, site visit team selects off-campus sites to visit.
- Discipline specific exemptions - Predoctoral, Dental Anesthesiology, Dental Assisting, Dental Laboratory Technology, and Dental Public Health.

Reporting Educational Activity Sites (continued)

Policy on Reporting and Approval of Sites Where Educational Activity Occurs



Definitions:

Supplemental Activity Site: Students/Residents choose to visit the site outside of the educational program, and the site is not used to fulfill program or accreditation requirements (e.g. volunteer mission trips, health fair, etc.).

Major Activity Site: Students/Residents are required to complete an experience at this site to meet a program requirement or accreditation standard, and **competency assessments or comparable summative assessments are performed** at the site.

Minor Activity Site: Students/Residents are required to complete an experience at this or another site to meet a program requirement or accreditation standard, and **no competency assessments or comparable summative assessments are performed** at the site. Evaluation may occur.

Guidelines to Report Educational Sites

- **Step 1 – Review and Download Guidelines**
<https://coda.ada.org/policies-and-guidelines/approval-of-sites-where-educational-activity-occurs-off-campus-sites>
- **Step 2 – Prepare Cover Sheet / Verification Page with Discipline Name and Submission Date (use true date of submission)**

Guidelines to Report Educational Sites

- Step 3 – Prepare your Sites Report
 - Answer Questions 1-14, with responses in each table box of the provided table.
 - Gather the signed affiliation agreement(s) for the site.
 - Gather the biosketch of the clinic supervisor/faculty/attending who will supervise students/residents/fellows at the site.
 - Prepare the additional Sites Where Educational Activity Occurs table for each site.

Guidelines to Report Educational Sites

- Step 4 – Gather all components of the report:
 - Verification Page
 - Questions 1-14
 - Biosketch for on-site supervisor
 - Affiliation Agreement (signed)
 - Affiliated Sites Table
- Step 5 – Ensure the electronic document is readable, navigable, bookmarked, etc.
- Step 6 – Submit to the CODA Manager and Support Staff.

Guidelines to Report Educational Sites

- Submit as follows:
 - **Minor Sites** – 30 days prior to use.
 - **Major Sites** – May 1 or November 1 for consideration at a CODA Meeting
 - Supplemental sites – those sites outside the educational program (not used to fulfill program or accreditation requirements) do not need to be reported.

Requesting Increases in Enrollment

- Please see the appropriate enrollment increase policies in EOIPP relative to your discipline
- Discipline-specific guidelines for requesting enrollment increase are available on the CODA web site
 - Predoctoral Guidelines available (not authorized enrollment)
 - Advanced Dental Education Guidelines (not authorized enrollment)
 - Advanced Dental Education programs are authorized for a base number enrollment. See Enrollment Policy.
 - Allied Dental education programs follows the “Report of Program Change” (*DH Guidelines - NEW*)
- If any program wants to modify enrollment, prior approval is required.
- Programs are reminded that resources must be maintained even when the full complement of students/residents/fellows is not enrolled in the program.

Requesting Increases In Enrollment Policy and Procedure Revisions (Advanced Education)

- Policy on Enrollment Increases in Advanced Dental Education Programs
 - Permits the Review Committee Chair to review and approve temporary, one-time only increases in enrollment of up to a maximum of six (6) months, if the program provides evidence of sufficient resources to support the temporary increase

Guidelines to Report an Enrollment Increase

- **Step 1 – Review and Download Guidelines**
<https://coda.ada.org/policies-and-guidelines/program-changes-deadlines-and-other-report-guidelines>
- **Step 2 – Prepare your Enrollment Report**
 - Create your own document (i.e., remove CODA instructions)
 - Provide introductory paragraph(s) describing the enrollment change and reason for the change.

Guidelines to Report an Enrollment Increase

- Step 3 – Prepare your Enrollment Report (cont.)
 - Answer all questions under “Required Documentation” section of Enrollment Guidelines.
 - DA and DLT – absent specific enrollment guidelines, please address adequate resources such as financial, faculty, facilities, curriculum, etc. to support the enrollment increase.
 - Provide relevant documentation demonstrating the program will continue to comply with the Accreditation Standard(s) after the increased enrollment.

Guidelines to Report an Enrollment Increase

- Step 4 – Develop the Signed Verification Page (ensure it matches the current report)
- Step 5 – Ensure the electronic document is readable, navigable, bookmarked, etc.
- Step 6 – Submit to the CODA Manager and Support Staff.
 - Remember, some changes will require CODA approval prior to implementation.

First Year Non-Enrollment

- Non-enrollment of First Year Students/Residents/Fellows
 - **Must** be reported to CODA as soon as the program decides to not accept a first-year class.
 - A program **must** maintain resources for full complement even when enrollment is reduced or in non-enrollment.
 - Program **must** maintain compliance with all Standards during period of non-enrollment.
 - Program must complete the Annual Survey and continue to pay the Annual Fee during period of non-enrollment.

Distance Education Policy

- Distance education means education that uses one or more of the technologies listed below to deliver instruction to students/residents/fellows who are separated from the instructor or instructors and to support regular and substantive interaction between the students/residents/fellows and the instructor or instructors, either synchronously or asynchronously.

The technologies may include:

- the internet;
- one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
- audio conference; or
- other media used in a course in conjunction with any of the technologies listed above.

Distance Education Policy

- For purposes of this definition, an **instructor** is an individual responsible for delivering course content and who meets the qualifications for instruction established by an institution's or program's accrediting agency.
- For purposes of this definition, **substantive interaction** is engaging students/residents/fellows in teaching, learning, and assessment, consistent with the content under discussion, and also **includes at least two** of the following:
 - Providing direct instruction;
 - Assessing or providing feedback on a student's/resident's/fellow's coursework;
 - Providing information or responding to questions about the content of a course or competency;
 - Facilitating a group discussion regarding the content of a course or competency; or
 - Other instructional activities approved by the institution's or program's accrediting agency.

Distance Education Policy

- **An institution ensures regular interaction** between a student/resident/fellow and an instructor or instructors by, **prior to the student's/resident's/fellow's completion of a course or competency**:
 - Providing the opportunity for substantive interactions with the student/resident/fellow on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and
 - Monitoring the student's/resident's/fellow's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student/resident/fellow when needed on the basis of such monitoring, or upon request by the student/resident/fellow.

Distance Education – CODA Expectations

Expectation is that programs using distance education:

- **must** comply with Accreditation Standards;
 - **must** have a student identity verification process; and
 - **must** alert students to possible associated charges
-
- Programs are reviewed at time of site visit for compliance with Distance Education policy

Distance Education Policy, Continued

Programs that offer distance education **must**:

- have a process in place through which the program establishes that the student/resident/fellow who registers in a distance education course or program is the same student/resident/fellow who participates in and completes the course or program and receives the academic credit;
- verify the identity of a student/resident/fellow who participates in class or coursework by using, at the option of the program, methods such as a secure login and pass code; proctored examinations; and/or new or other technologies and practices that are effective in verifying student/resident/fellow identity;
- make clear in writing that processes are used that protect student/resident/fellow privacy;
- notify students/residents/fellows of any projected additional student/resident/fellow charges associated with the verification of student/resident/fellow identity at the time of registration or enrollment.

Guidelines to Report Distance Education

- **Step 1 – Review and Download Guidelines**
<https://coda.ada.org/policies-and-guidelines/program-changes-deadlines-and-other-report-guidelines>
- **Step 2 – Prepare Cover Sheet / Verification Page with Discipline Name and Submission Date (use true date of submission)**

Guidelines to Report Distance Education

- Step 3 – Prepare your Distance Education Report
 - Answer Question 1 (a-f) and Question 2 (a-d), with responses in each table box of the provided table.
 - Describe the program BEFORE and AFTER the change.
 - Frequency of Use
 - Timeline for Use
 - Type of Use; didactic or other course types
 - Appraise the impact of the change on the program.

Guidelines to Report Distance Education

- Step 3 – Prepare your Distance Education Report (cont):
 - Provide relevant documentation demonstrating the program continues to comply with the Accreditation Standard(s).
- Step 4 – Gather all components of the report
- Step 5 – Ensure the electronic document is readable, navigable, bookmarked, etc.
- Step 6 – Submit to the CODA Manager and Support Staff.

Final Reminders on Report Submission

- **Use the Guidelines available on CODA's website** (answer all questions, provide all information, include all necessary documentation)
- Adhere to the **FORMAT** and **MECHANICS** requirements
- Include a **signed Verification Page** – this must be signed by the CEO, CAO and Program Director

Final Reminders on Report Submission

- **Reports that fail to adhere to the stated guidelines may be returned to the program and may not be reviewed at the assigned time.** The Commission's timelines for demonstration of full compliance will not be modified due to a delayed review resulting from improperly formatted reports.
- **All institutions offering programs accredited by the Commission are expected to adhere to deadlines for requests for program information.** 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.

Report Submission – CODA's E-Portal

- Electronic submission is required (CODA will not accept paper reports or reports mailed to the CODA office)
- Submit by E-mail (general reports) or via the E-Portal (self-study), as dictated by file size and Electronic Submission Guidelines
- <https://coda.ada.org/policies-and-guidelines/electronic-submission-guidelines>

Complaint Policy – Program Requirements

- **Part 1:** Demonstrate that students/residents/fellows are notified, at least annually, of the opportunity and the procedures to file complaints with the Commission
- **Part 2:** Maintain a record of student/resident/fellow complaints
- Maintain and provide evidence of notification and records to the visiting committee during the site visit. The visiting committee looks for themes related to Standards and compliance with this policy

Complaints Against Educational Programs

- **Formal Complaints** - a complaint filed in written (or electronic) form and signed by the complainant.
- **Anonymous Complaints** - an unsigned comment/complaint submitted to the Commission. Any submitted information that identifies the complainant renders this submission a *formal complaint* and will be reviewed as such (e.g. inclusion of a complainant's name within an email or submitted documentation).

Complaints Against Educational Programs

- An **appropriate complaint** is one that directly addresses a program's compliance with the Commission's standards, policies and procedures.
- The Commission is interested in the continued improvement and sustained quality of dental and dental-related education programs but does not intervene on behalf of individuals or act as a court of appeal for treatment received by patients or individuals in matters of admission, appointment, promotion or dismissal of faculty, staff or students.

Complaints Against Educational Programs – Formal Complaint Review

- If the complaint provides sufficient evidence of probable cause of noncompliance with the standards or required accreditation procedures, the complainant is so advised, and the complaint is investigated
- If the complaint does not provide sufficient evidence of probable cause of noncompliance with the standard(s) or required accreditation policy(ies), or procedure(s), the complainant is so advised
 - Complainant may revise and submit sufficient information to pursue a formal complaint
 - Complainant may not pursue the complaint, and no further action will be taken

Complaints Against Educational Programs – Anonymous Complaint Review

- If linkage to Accreditation Standards or CODA policy is identified, and further investigation is warranted, the anonymous complaint will be handled as a formal complaint. However, due to the anonymous nature of the submission, the Commission will not correspond with the complainant.
- Anonymous comments/complaints determined to be unrelated to an Accreditation Standard or CODA policies and procedures will not be considered.
- Anonymous comments/complaints that do not provide sufficient evidence of probable cause of noncompliance with the standard(s) or required accreditation policy(ies), or procedure(s) to proceed, will not be considered.

Policy on Electronic Submission of Accreditation Materials

- All institutions will provide the Commission with an electronic copy of all accreditation documents/reports and related materials.
- The program's documentation for CODA **must not** contain any patient Protected Health Information (PHI) or Sensitive Personal Information (SPI).
- **CODA will no longer accept paper reports from programs; all documents must be submitted electronically, only, via CODA's email or electronic portal.**

CODA Disclaimer – Privacy and Data Security

- CODA staff are not privacy and data security compliance experts
- This information must not be viewed as legal advice and may only be used as a guide to assist the program in complying with CODA's privacy and data security requirements
- You must contact your institution's compliance office and legal counsel for guidance

Reminder About Privacy and Data Security...

- The program's documentation for CODA (self-study, application, or reports to CODA, for example) must NOT contain any sensitive personally identifiable information (**“Sensitive Personal Information” or “SPI”**) as outlined in “Privacy and Data Security Requirements for Institutions”. Similarly, such documentation must not contain any identifiable **Protected Health Information (“PHI”)**; therefore, no “patient identifiers” may be included. This applies whether or not the program is required to comply with HIPAA.
- Before sending documents to CODA, appropriately redact all SPI and all PHI, including all patient identifiers such that the SPI/PHI and patient identifiers 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.

Reminder About Privacy and Data Security...

- If PHI and/or SPI is found, or if it is inappropriately or inadequately redacted:
 - The institution's CEO, CAO, and HIPAA compliance officer, along with the program director, is notified of the CODA violation
 - The program is asked to upload a corrected electronic version of the self-study, minus the PHI or SPI, to the CODA E-Portal for the visiting committee and Commission office
 - The program is asked to resend another electronic version of the program report or other communication to the Commission office
 - **Program will be assessed administrative fee of \$4,000**

Expectations Related to Privacy & Data Security

- In accordance with the **Business Associate Agreement (BAA)** between CODA and your institution, the following is expected:
 - SPI and PHI will only be viewed on-site (in the program's facility), and only to the extent necessary to conduct the work of CODA
- **Signed Verification Page:**
 - Serves as an attestation that the report/self-study/document submitted to CODA contains no prohibited Sensitive Personal Information (SPI) or Protected Health Information (PHI)

Sensitive Personal Information

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

Patient Identifiers

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]

Patient Identifiers (cont.)

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.

Reminders

- Review...Review...Review (by multiple people)
- Ensure you use the CODA Biosketch, never submit a curriculum vitae or resume
- Use blank templates, not completed forms, as examples for CODA
- Review all PowerPoints, slides, radiographs in your submission
- Look for names and initials of potential patients

Reminders

- Look at dates (any dates) that may be associated with a patient
- Review photos, particularly if they are clinic photos that may be considered a patient photo

Redaction

- **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.
- **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”.**

Recent changes to CODA Privacy and Data Security Policy

- CODA will no longer perform a page-by-page review of materials submitted by an educational program to the Commission and/or its workforce members.
- If the Commission becomes aware that SPI/PHI is identified (at any time in the future), the program will be assessed an administrative fee by the Commission. Each subsequent finding would be imposed an additional administrative fee.

Online Resources and Staff Contacts

Upcoming Sessions – Save the Date

- **Site Visit Orientation (2024 – 2026 visits)**
 - April 8, 2024
 - Predoctoral and Dental Therapy, 9-11am
 - Allied, 12-2pm
 - Advanced, 3-5pm
- **Site Visitor Update**
 - April 15, 2024
 - Predoctoral and Dental Therapy, 9-11am
 - Allied, 12-2pm
 - Advanced, 3-5pm

On-Demand Webinar

- An Introduction to CODA: A Briefing on the Commission on Dental Accreditation for Program Directors
- <https://coda.ada.org/site-visitor-resources>

CODA Website Resources

About CODA

- <https://coda.ada.org/about-coda>

Standards

- <https://coda.ada.org/standards>

Policy and Guidelines

<https://coda.ada.org/policies-and-guidelines>

The Site Visit Process and Related Documents

- <https://coda.ada.org/site-visits>

CODA Website - Accreditation Updates

Meeting Dates

- <https://coda.ada.org/accreditation/meeting-materials>

Reports of Major Actions and Minutes of past meetings

- <https://coda.ada.org/accreditation/post-meeting-actions>

Hearing information

- <https://coda.ada.org/accreditation/open-hearings-comments-due>

Site Visit Schedules (U.S. and International)

- <https://coda.ada.org/site-visitor-resources/site-visit-schedule>

Other CODA Communications

- CODA Communicator E-Newsletter
<https://coda.ada.org/accreditation>
 - Distributed twice per year, following each Commission meeting
- Commission Alert Emails
 - Hearings
 - Review Committee Openings
 - Nominations for Site Visitors

To contact CODA staff

Staff contacts are found on CODA's website:

<https://coda.ada.org/about-coda/coda-staff>

Please contact staff by email and phone.

CODA conducts all business electronically.
Please do not send postal mail to the
Commission office.

Commission on Dental Accreditation

211 E. Chicago Ave., Chicago IL 60611

Questions?

Thank You