

## COMMISSION ON DENTAL ACCREDITATION

### SITE VISITORS

The Commission uses site visitors with education and practice expertise in the discipline or areas being evaluated to conduct its accreditation program. Nominations for site visitors are requested from national dental and dental-related organizations representing the areas affected by the accreditation process. Self-nominations are accepted. Site visitors are appointed by the Commission annually and may be re-appointed.

During the term of service as a Review Committee member, these individuals should not serve as site visitors for an actual accreditation site visit to an accredited or developing program, unless deemed necessary. Two instances when a review committee member could serve on a site visit include: 1) an inability to find a site visitor from the comprehensive site visitor list, or 2) when the review committee believes a member should attend a visit for consistency in the review process. This applies only to site visits that would be considered by the same review committee on which the site visitor is serving. Review committee members are prohibited from serving as independent consultants for mock accreditation purposes. These policies help avoid conflict of interest in the decision making process and minimize the need for recusals.

During the term of service as a commissioner, these individuals may not independently consult with a CODA-accredited program or a program applying for CODA accreditation. In addition, site visitors serving on the Commission may not serve on a site visit team during their terms.

All other active site visitors who independently consult with educational programs accredited by CODA or applying for accreditation must identify all consulting roles to the Commission and must file with the Commission a letter of conflict acknowledgement signed by themselves and the institution/program with whom they consulted. Following service on the site visit team, an active site visitor is prohibited from independently consulting with the program that they evaluated within the past ten (10) years. All conflict of interest policies as noted elsewhere in this document apply. Contact the CODA office for the appropriate conflict of interest declaration form.

Prior to a site visit, a list of site visitors and other participants is reviewed by the institution/program for conflict of interest or any other potential problem. The program/institution being site visited will be permitted to remove individuals from the list if a conflict of interest, as described in the Commission's Conflict of Interest Policy, can be demonstrated. Information concerning the conflict of interest must be provided in writing clearly stating the specifics of the conflict.

Site visitors are appointed by the Chair and approved by the institution's administration, i.e. dental school dean or program director. The visiting committee conducts the site visit and prepares the report of the site visit findings for Commission action. The size and composition of a visiting committee varies with the number and kinds of educational programs offered by the institution, and will include, whenever possible, at least one (1) educator and one (1) practitioner. All visiting committees will include at least one person who is not a member of a Review Committee of the Commission or a Commission staff member. Two dental hygiene site visitors shall be assigned to dental school-sponsored dental hygiene site visits.

When appropriate, a generalist representative from a regional accrediting agency may be invited by the chief executive officer of an institution to participate in the site visit with the Commission's visiting committee. A generalist advises, consults and participates fully in committee activities during a site visit. The generalist's expenses are reimbursed by the institution. The generalist can help to ensure that the overall institutional perspective is considered while the specific programs are being reviewed.

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The institution is encouraged to invite the state board of dentistry to send a current member to participate in the site visit. If invited, the current member of the state board receives the same background materials as other site visit committee members and participates in all site visit conferences and executive sessions. The state board of dentistry reimburses its member for expenses incurred during the site visit.

In addition to other participants, Commission staff member may participate on the visiting committee for training purposes. It is emphasized that site visitors are fact-finders, who report committee findings to the Commission. Only the Commission is authorized to take action affecting the accreditation status.

Revised: 8/24; 2/23; 4/22; 8/19; 2/16; 8/14; 1/14; 1/03, 1/00, 7/97; Reaffirmed: 8/10, 7/09, 7/07, 7/06, 7/01;  
CODA: 07/96:10, 12/83:4

**1. Appointments:** All site visitor appointments are made annually for one year terms for a maximum of six consecutive years. Following the maximum appointment period of six consecutive years, the site visitor may reapply for appointment after one year. In exceptional circumstances the Review Committee may recommend that the Commission alter an individual's term limits. Site visitors assist the Commission in a number of ways, including: developing accreditation standards, serving on special committees, and serving as site visitors on visits to predoctoral, advanced dental and allied dental education programs.

The Commission reviews nominations received from its communities of interest, including discipline-specific sponsoring organizations and certifying boards. Individuals may also self-nominate. In addition to the mandatory subject expertise, the Commission always requests nominations of potentially under-represented ethnic groups and women, and makes every effort to achieve a pool of site visitors with broad geographic diversity to help reduce site visit travel expenses.

Site visitors are appointed/reappointed annually and required to sign the Commission's Conflict of Interest Statement, the Agreement of Confidentiality, the Copyright Assignment, Licensure Attestation, and the ADA's Professional Conduct Policy and Prohibition Against Harassment. Site visitors must also complete annual training and will receive periodic updates on the Commission's policies and procedures related to the Health Insurance Portability and Accountability Act (HIPAA). The Commission office stores these forms for seven (7) years. In addition, site visitors must comply with training requirements, the ADA's travel policy and other CODA Rules and Regulations. The Commission may remove a site visitor for failing to comply with the Commission's policies and procedures, continued, gross or willful neglect of the duties of a site visitor, or other just cause as determined by the Commission.

Subsequent to appointment/reappointment by the Commission, site visitors receive an appointment letter explaining the process for appointment, training, and scheduling of Commission site visitors.

Revised: 8/19; 8/18; 8/14; 7/08; Reaffirmed: 8/24; 8/10, 1/98, 8/02; CODA: 07/94:9, 01/95:10

**2. Criteria For Nomination Of Site Visitors:** For predoctoral dental education programs, the Commission solicits nominations for site visitors from the American Dental Education Association to serve in five of six roles on dental education program site visits. The site visitor roles are Chair, Basic Science, Clinical Science, Curriculum, and Finance. Nominations for the sixth role, national licensure site visitor, are solicited from the American Association of Dental Boards.

For advanced dental education programs, the Commission solicits nominations for site visitors from the discipline-specific sponsoring organizations and their certifying boards.

For allied dental education programs, the American Dental Education Association is an additional source of nominations that augments, not supersedes, the nominations from the Commission's other participating

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organizations, American Dental Assistants Association (ADAA), American Dental Hygienists' Association (ADHA) and National Association of Dental Laboratories (NADL)

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The Commission requests all agencies nominating site visitors to consider regional distribution, gender and minority representation and previous experience as a site visitor. Although site visitors are nominated by a variety of sources, the Commission carefully reviews the nominations and appoints site visitors on the basis of need in particular areas of expertise. The pool of site visitors is utilized for on-site evaluations, for special consultations and for special or Review Committees.

Appointments are made at the Winter (January/February) Commission meeting and become effective upon Commission action and completion of site visitor mandatory training.

Revised: 4/22; 2/22; 1/20; 8/19; 8/18; 8/14; 8/12, 7/09, 7/07, 7/01; Reaffirmed: 8/24; 8/10; Adopted: 7/98

In addition to the discipline-specific criteria noted below, the following criteria apply to all site visitor nominees.

**Criteria for Educator Site Visitor Nominees.** The following are criteria for educator site visitor nominees:

- Commitment to predoctoral, advanced, and/or allied dental education;
- Active involvement in an accredited predoctoral, advanced, or allied dental education program as a full- or part-time faculty member;
- Subject matter experts with formal education and credentialed in the applicable discipline; and

**Criteria for Practitioner Site Visitor Nominees.** The following are criteria for practitioner site visitor nominees:

- Commitment to predoctoral, advanced, and/or allied dental education;
- Current active license and work effort as a practitioner or clinical instructor; and
- Formal education and credential in the applicable discipline.

Adopted 4/22; Reaffirmed: 8/24

A. **Predocutorial Dental Education:** The accreditation of predoctoral dental education programs is conducted through the mechanism of a visiting committee. Membership on such visiting committees is general dentistry oriented rather than discipline or subject matter area oriented. The composition of such committees shall be comprised, insofar as possible, of site visitors having broad expertise in dental curriculum, basic sciences, clinical sciences, finance, national licensure (practitioner) and one Commission staff member. The evaluation visit is oriented to an assessment of the educational program's success in training competent general practitioners.

Although a basic science or clinical science site visitor may have training in a specific basic science or discipline-specific advanced dental education area, it is expected that when serving as a member of the core committee evaluating the predoctoral program, the site visitor serves as a general dentist. Further, it is expected that all findings, conclusions or recommendations that are to be included in the report must have the concurrence of the visiting committee team members to ensure that the report reflects the judgment of the entire visiting committee.

In appointing site visitors, the Commission takes into account a balance in geographic distribution as well as representation of the various types of educational settings and diversity. Because the

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Commission views the accreditation process as one of peer review, predoctoral dental education site visitors, with the exception of the national licensure site visitor, are affiliated with dental education programs.

The following are criteria for the six roles of predoctoral dental education site visitors:

### Chair:

- Must be a current dean of a dental school or have served as dean within the previous three (3) years.
- Should have accreditation experience through an affiliation with a dental education program accredited by the Commission and as a previous site visitor.

### Basic Science:

- Must be an individual who currently teaches one or more biomedical science courses to dental education students or has done so within the previous three (3) years.
- Should have accreditation experience through an affiliation with a dental education program accredited by the Commission or as a previous site visitor.

### Clinical Science:

- Must be a current clinical dean or an individual with extensive knowledge of and experience with the quality assurance process and overall clinic operations.
- Has served in the above capacity within the previous three (3) years.
- Should have accreditation experience through an affiliation with a dental education program accredited by the Commission or as a previous site visitor.

### Curriculum:

- Must be a current academic affairs dean or an individual with extensive knowledge and experience in curriculum management.
- Has served in the above capacity within the previous three (3) years.
- Should have accreditation experience through an affiliation with a dental education program accredited by the Commission or as a previous site visitor.

### Finance:

- Must be a current financial officer of a dental school or an individual with extensive knowledge of and experience with the business, finance and administration of a dental school.
- Has served in the above capacity within the previous three (3) years.
- Should have accreditation experience through an affiliation with a dental education program accredited by the Commission or as a previous site visitor.

### National Licensure:

- Should be a current clinical board examiner or have served in that capacity within the previous three (3) years.
- Should have an interest in the accreditation process.

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- B. **Advanced Dental Education:** In the disciplines of dental public health, dental anesthesiology, endodontics, oral and maxillofacial pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, oral medicine, orofacial pain, orthodontics and dentofacial orthopedics, pediatric dentistry, periodontics and prosthodontics, sponsoring organizations are advised that candidates recommended to serve as site visitors be board certified and/or have completed or participated in a CODA-accredited advanced dental education program in the discipline and must have experience in advanced dental

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education as teachers or administrators. Each applicable Review Committee will determine if board certification is required. Some sponsoring organizations have established additional criteria for their nominations to the Commission.

- C. **Allied Dental Education in Dental Hygiene:** In appointing site visitors, the Commission takes into account a balance in geographic distribution, representation of the various types of educational settings, and diversity. Because the Commission views the accreditation process as one of peer review, the dental hygiene education site visitors are affiliated with dental hygiene education programs.

The following are criteria for selection of dental hygiene site visitors:

- a full-time or part-time appointment with a dental hygiene program accredited by the Commission on Dental Accreditation;
- a baccalaureate or higher degree;
- background in educational methodology;
- accreditation experience through an affiliation with a dental hygiene education program that has completed a site visit; and
- accreditation experience within the previous three (3) years.

Revised: 8/21; 8/18; 8/16; 8/14; Reaffirmed: 8/24; 8/19; 8/10; Adopted: 7/09

- D. **Allied Dental Education in Dental Assisting:** The following are criteria for selection of dental assisting site visitors:

- certification by the Dental Assisting National Board as a dental assistant;
- full-time or part-time appointment with a dental assisting program accredited by the Commission on Dental Accreditation;
- equivalent of three (3) years full-time dental assisting teaching experience;
- baccalaureate or higher degree;
- demonstrated knowledge of accreditation; and
- current background in educational methodology.

\*A licensed dentist who is faculty at a CODA-accredited dental assisting program does not need certification by the Dental Assisting National Board as a dental assistant.

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- E. **Allied Dental Education in Dental Laboratory Technology:** The following are criteria for selection of dental laboratory technology site visitors:

- background in all five (5) dental laboratory technology specialty areas: complete dentures, removable dentures, crown and bridge, dental ceramics, and orthodontics;
- background in educational methodology
- knowledge of the accreditation process and the Accreditation Standards for Dental Laboratory Technology Education Programs;
- Certified Dental Technician (CDT) credential through the National Board of Certification (NBC); and
- full or part-time appointment with a dental laboratory technology education program accredited by the Commission on Dental Accreditation or previous experience as a Commission on Dental Accreditation site visitor.

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- F. **Allied Dental Education in Dental Therapy:** The following are criteria for selection of dental therapy site visitors:

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- a full-time or part-time appointment with a predoctoral dental or allied dental education program accredited by the Commission on Dental Accreditation or an accredited (or recognized) dental therapy program;
- a baccalaureate or higher degree;
- background in educational methodology;
- accreditation experience through an affiliation with a dental therapy, allied, or predoctoral dental program that has completed a site visit;\*
- accreditation experience within the previous three (3) years;\*
- must either be a licensed dentist educator (general dentist) or licensed dental therapist educator; and
- the “licensed dentist educator” may be predoctoral dental educator site visitors (*i.e., a general dentist educator who serves as curriculum or clinical predoctoral site visitor*) or allied dental educator site visitors.

\*temporarily waived for dental therapist educator position until after CODA determines there exists an adequate supply of site visitors.

Dental therapy site visit team consist of three (3) members as follows: one (1) dental therapist educator, one (1) predoctoral dentist educator (curriculum or clinical site visitor), and one (1) additional site visitor that could be either a second dental therapist educator, second predoctoral dentist educator, or an allied dentist educator. If needed due to lack of dental therapy educator availability, such that if a dental therapy educator cannot be identified in accordance with Commission policy then the three-person site visit team may be composed of predoctoral educators and allied dentists, three (3) people total in any combination.

Revised: 8/23; 2/21; 8/18; 8/16; Reaffirmed: 8/24; 8/19; Adopted: 02/16

**3. Policy Statement On Site Visitor Training:** The Commission has a long history of a strong commitment to site visitor training and requires that all program evaluators receive training. Prior to participation, site visitors must demonstrate that they are knowledgeable about the Commission’s accreditation standards and its Evaluation and Operational Policies and Procedures. Initial and ongoing training takes place in several formats.

New site visitors must attend a two-day formal workshop that follows the format of an actual site visit. All new site visitors are directed to the Commission’s on-line training program and are required to successfully complete the training program and site visitor final assessment.

Site visitor update sessions take place at several dental-related meetings, such as the annual session of the American Dental Education Association (ADEA), the American Association of Oral and Maxillofacial Surgeons and the ADEA Allied Dental Program Directors’ Conference. The Commission may entertain requests from other organizations. Components from the workshop are sometimes presented at these meetings; however, the primary purpose of the update sessions is to inform site visitors about recent Commission activities, revisions to standards and newly adopted policies and procedures.

Keeping costs in mind, the Commission continually explores new methods of providing initial and ongoing training to site visitors, as well as ensuring their ongoing competence and calibration. Methods being examined include on-line materials, virtual webinars (synchronous and/or asynchronous), broadcast e-mails and other self-instructional materials.

The Commission emphasizes its increased commitment to quality training for site visitors. While the Commission sponsors comprehensive training for new site visitors and provides updates for site visitors on a regular basis, all parent organizations are urged to provide support for CODA-sponsored training to

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augment the Commission's programs. All active site visitors must complete mandatory annual web-based retraining in order to retain appointment.

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### 4. Job Descriptions For Predoctoral Dental Education Visiting Committee Members:

#### A. Chair:

- Will conduct a briefing session with the entire visiting committee relative to the philosophy of the Commission on the approach, purpose and methodology of the conduct of the site visit on the evening prior to the first day of the site visit;
- Will be responsible for the continual reinforcement of the above concepts during the course of the site visit and for monitoring continually the conduct of the site visit;
- Will brief visiting committee members as to their role as a fact-finding and reporting committee and the appropriate protocol during the course of the site visit; including what is expected of each member in terms of kinds of activities and relative to the report of findings and conclusions and recommendations, with adequate background rationale for making recommendations and enumerating strengths and weaknesses in the education program being evaluated;
- Will lead all assigned conferences and executive sessions;
- Will serve as liaison between the visiting committee members and the dental administration and the executive administrators of the institution;
- Will make specific and special assignments to individual visiting committee members relative to evaluating and reporting on specific matters and sections of the site visit report, e.g. administrative organization, faculty, library facilities and resources, research program, facilities and equipment, admission process, hospital program(s), student achievement;
- Will be responsible for ensuring that site visitors fully understand their responsibility for reporting adequately, but succinctly, in their area of expertise (finance, curriculum, basic sciences, clinical sciences and national licensure);
- Will consult with the dental administration at regular intervals to discuss progress of the visit;
- Will be responsible, during executive sessions with visiting committee members, for the separation of recommendations from suggestions—focusing upon the recommendations which are to be included in the site visit report which are considered to be major, critical and essential to the conduct of the education program(s); suggestions for program enhancement are to be included as part of the narrative of the report;
- Will be responsible for the preparation of a written summary of the visiting committee's conclusions, findings, perceptions and observations of the program(s) in the form of suggestions and recommendations, as appropriate, for oral presentation during the exit interview with the Dean, and for presentation of an abbreviated summary during the exit interview with the institution's executive administrators.
- Will assess institutional effectiveness including:
  - Assessment of the school's mission statement;
  - Assessment and evaluation of the school's planning, and achievement of defined goals related to education, patient care, research and service;
  - Assessment of the school's outcomes assessment process; and
  - Evaluation of the school's interaction with other components of higher education, health care education or health care delivery systems.
- Will assess the effectiveness of faculty and staff including:
  - Assessment of the number and distribution of faculty in meeting the school's stated objectives;
  - Assessment of the school's faculty development process;
  - Assessment of the school's faculty governance;

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- Assessment of the school's measurement of faculty performance in teaching, patient care, scholarship and service; and
  - Assessment of the school's promotion and tenure process.
- B. **Financial Site Visitor:** Will confer with the sponsoring institution's chief financial officer(s) and the dental administration and its financial manager to assess the adequacy of the full spectrum of finance as it relates to the dental school including:
- Assessment of the operating budget and budgeting process;
  - Assessment of all sources of revenue (state, federal, tuition and fees, practice plans, etc.);
  - Evaluation of the maintenance of the facilities and learning resources to support the school's mission and goals;
  - Assessment of the school's compliance with applicable regulations;
  - Assessment of the resources for planned and/or future renovations and/or new construction; and
  - Assessment of the school's resources as they relate to its mission and goals.
- C. **Curriculum Site Visitor:** Will examine the education program and the education support services including:
- Admissions
  - Instruction
  - Curriculum Management
  - Behavioral Sciences
  - Practice Management
  - Ethics and Professionalism
  - Information Management and Critical Thinking
  - Student Services
- D. **Basic Science Site Visitor:** Will work closely with curriculum site visitor to ensure consistency of evaluation and assessment. During the formal and informal evaluation of the basic sciences, the site visitor will conduct personal interviews with students, faculty and departmental Chairs and during the assessment will focus on:
- Biomedical Sciences
  - Research Program
- E. **Clinical Sciences Site Visitor:** Within the limitations imposed by the length of the site visit, will examine and evaluate the preclinical and clinical portions of the predoctoral dental education program and activities in terms of the details of what is occurring in these areas and assess the quality of the education and experiences provided to students to prepare them for dental practice. Will work closely with curriculum site visitor to ensure consistency of evaluation and assessment. During the formal and informal evaluation of the preclinical and clinical sciences, will conduct personal interviews with students, faculty and departmental chairs and during the assessment will focus upon:
- Clinical Sciences
  - Patient Care Services
  - During the formal and informal evaluation of the clinical program, will conduct personal interviews with students, faculty and departmental chairs and during the assessment will focus upon:
    - stated objectives;
    - adequacy of instruction;
    - appropriateness of subject matter;
    - intra/extra-mural experiences;
    - student clinic requirements;
    - student performance evaluation mechanisms;
    - sterilization of instruments;
    - patient care policies;



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- laboratory tests for patients;
- patient physical examinations; and
- clinic administration.

F. **National Licensure (Practitioner) Site Visitor:** Will serve in the same capacity as the clinical sciences site visitor on the visiting committee.

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**5. Job Description For Advanced Dental Education Site Visitors:** Dental Public Health, Endodontics, Oral and Maxillofacial Pathology, Oral and Maxillofacial Radiology, Oral and Maxillofacial Surgery (Residency and Fellowship), Orthodontics and Dentofacial Orthopedics (Residency and Fellowship), Pediatric Dentistry, Periodontics, Prosthodontics (Combined and Maxillofacial), and Advanced Education in General Dentistry, General Practice Residency, Oral Medicine, Orofacial Pain, and Dental Anesthesiology.

Advanced dental education program site visitors will utilize the site visitors' evaluation report form for their respective area, conduct personal interviews with Program Directors, faculty and students, and assess the advanced dental education program focusing upon:

- administration and staff;
- admissions procedures;
- physical facilities and equipment;
- didactic program (biomedical, lecture, seminar and conference program)
- clinical program;
- evaluation of residents;
- research activities and requirements;
- library resources;
- intra/extra-mural experiences;
- hospital program; and
- teaching conducted by residents.

An assessment of the strengths and weaknesses of the advanced dental education program is based upon the published accreditation standards for each respective program.

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**6. Job Description For Allied Dental Education Site Visitors:**

**A. Site Visit Chair**

- Will function as chair/staff representative of visiting committee of site visitors evaluating the allied dental education programs in dental assisting, dental hygiene, dental therapy and dental laboratory technology;
- Will be responsible for the continual reinforcement of the Commission's procedures to be used for the site visit and for monitoring continually the conduct of the visit;
- Will brief site visitors as to their role as a fact finding and reporting committee and the appropriate protocol during the course of the site visit; including what is expected of each site visitor in terms of kinds of activities and relative to the report of findings and conclusions and recommendations, with adequate background rationale for making recommendations and enumerating strengths and weaknesses in the education program being evaluated;
- Will chair all conferences and meetings of the allied dental visiting committee, as well as those which occur during the visiting committee's executive sessions;

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- Will be responsible for maintaining closely the site visit evaluation schedule;
- Will serve as liaison between the visiting committee and the allied dental visiting committee members;
- Will make specific and special assignments to individual visiting committee members relative to evaluating and reporting on specific matters and sections of the site visit report, e.g. administrative organization, faculty, library facilities and resources, research program facilities and equipment, admissions process, hospital program(s), student achievement;
- Will be responsible for ensuring that site visitors fully understand their responsibility for reporting adequately, but succinctly, in their area of expertise;
- Will consult with the allied dental administration at regular intervals to discuss progress of the visit;
- Will be responsible, during executive sessions with visiting committee members, for the separation of recommendations from suggestions – focusing upon the recommendations which are to be included in the site visit report which are considered major, critical and essential to the conduct of the education program(s). Suggestions for program enhancement are to be included as part of the narrative of the report; and
- Will be responsible for the preparation of a written summary of the visiting committee's conclusions, finding, perceptions and observations of program(s) strengths, weaknesses, recommendations and suggestions for oral presentation during the exit interview with the dean, and for presentation of an abbreviated summary during the exit interview with the institution's executive administrators.

**B. Dentist:** A dentist is also included, when at all possible, on site visits to dental assisting and dental hygiene programs in settings other than dental schools. An additional dentist site visitor will be added to dental school visiting committees when multiple programs are to be reviewed.

The role of the dentist team member during allied site visits includes the following responsibilities:

- Take notes during conferences;
- Conduct meeting with advisory committee, when applicable;
- Ensure confidentiality by waiting to begin the meeting until all affiliated school personnel have left the room;
- Introduce the visiting committee to the advisory committee members;
- Thank the members of the committee for meeting with the team and for their interest in and commitment to the specific allied program(s);
- Explain the purpose of the site visit;
- Discuss the Commission's policy on confidentiality as it applies to the meeting and the entire site visit;
- Begin discussion of the following topics/questions:
  - a. How often the committee meets and the purpose or goals of the committee
  - b. Strengths/weaknesses of the students
  - c. Specific current committee activities and future goals or anticipated activities
- Ensure that all of the questions in the Site Visit Evaluation Report form under Standard 1. Institutional Effectiveness, Community Resources are answered during the meeting;
- Assist Curriculum site visitor in review of science courses;
- Review clinical courses and clinical evaluation mechanisms;
- Review learning resources – library & audiovisual materials/equipment (It is usually most efficient for this review to be conducted by the dentist site visitor only.);
- Review documentation in the self-study prior to visit;
- Conduct preclinical, clinical, and/or laboratory observations (on/off campus) with Curriculum site visitor;
  - a. Extended campus laboratory facilities
  - b. Extramural clinical facilities

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- Review equipment and instruments using Site Visit Evaluation Report Checklist under Standard 4. Educational Support Services;
- Formulate recommendations and suggestions; and
- After the visit, review and critique preliminary draft of the site visit report.

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