

REPORT OF THE AD HOC COMMITTEE TO CONSIDER ADVANCED DENTAL EDUCATION DELIVERY MODELS

Background: At its Winter 2022 meeting, the Commission on Dental Accreditation (CODA) directed the formation of an Ad Hoc Committee to consider the changing landscape of health care delivery centers that may sponsor advanced dental education programs and the increased interest in creation and potential accreditation of combined advanced dental education programs in two (2) discipline areas, with a report to the Commission in Summer 2022. The work of the Ad Hoc Committee related to potential accreditation of combined advanced dental education programs in two (2) disciplines was completed with a report to the Commission in Summer 2022. Therefore, this report provides a summary of the Ad Hoc Committee's review of the changing landscape of health care delivery centers that may sponsor advanced dental education programs.

The following individuals composed the Ad Hoc Committee to Consider Advanced Dental Education Deliver Models: Dr. Joel Berg (PED RC, chair of committee), Dr. Evanthia Anadioti (PROS RC), Dr. Victor Badner (DPH RC), Dr. Indraneel Bhattacharyya (OMP RC), Dr. Joseph Cohen (OP RC), Dr. Scott DeRossi (OM RC), Dr. Scott DeVito (Public), Dr. Joseph Giovannitti (DENTANES RC), Dr. George Kushner (OMS RC), Dr. Brent Larson (ORTHO RC), Dr. Paul Luepke (PERIO RC), Dr. Sanjay Mallya (OMR RC), Dr. Garry Myers (ENDO RC), and Dr. Miriam Robbins (PGD RC).

The Ad Hoc Committee met on December 5, 2022, and all members were present except Dr. Leupke; further, Drs. Robbins, Myers and Cohen attended a portion of the meeting. Dr. Maxine Feinberg, vice chair, Commission on Dental Accreditation, *ex-officio*, was in attendance. Dr. Sherin Tooks, senior director, CODA, Ms. Kirsten Nadler, manager, Advanced Dental Education, CODA, Ms. Peggy Soeldner, manager, Advanced Dental Education, CODA, and Ms. Cathryn Albrecht, senior associate general counsel, ADA/CODA were in attendance, as was Ms. Elise Scanlon, Elise Scanlon Law Group, who served as an advisor to the Committee.

The Ad Hoc Committee conducted a subsequent meeting on January 25, 2023, and all members were present except Dr. George Kushner. Dr. Maxine Feinberg, vice chair, Commission on Dental Accreditation, *ex-officio*, was in attendance. Dr. Sherin Tooks, senior director, CODA, Ms. Kirsten Nadler, manager, Advanced Dental Education, CODA, Ms. Peggy Soeldner, manager, Advanced Dental Education, CODA, and Ms. Cathryn Albrecht, senior associate general counsel, ADA/CODA were in attendance, as was Ms. Elise Scanlon, Elise Scanlon Law Group, who served as an advisor to the Committee.

Report and Recommendations of the Ad Hoc Committee: The Ad Hoc Committee began with a reminder of its charge related to consideration of health care delivery centers that may sponsor advanced dental education programs. The Committee noted there were two (2) primary considerations in this area: 1) the topic of institutional sponsor, whether a sponsor is an academic institution, hospital, or health care organization, and 2) the standard found in some advanced

dental education disciplines that requires the sponsor have proper chartering/licensure to operate and offer instruction leading to a degree, diploma or certificate with recognized education validity. The Ad Hoc Committee believed these two (2) topics should be considered independently.

Institutional Sponsor (Health Care Organizations): The Ad Hoc Committee considered the work of the advisor (**Commission Only Appendix**), and began its discussion related to institutions that may sponsor advanced dental education programs. The Committee was reminded that CODA holds United States Department of Education (USDE) recognition as a programmatic accrediting agency; therefore, all educational standards within CODA's purview include a requirement for institutional sponsor accreditation/recognition to ensure institutional oversight by an external agency. Regarding CODA's USDE recognition, it was noted there would be no concern in modifying the Standards with regard to institutional accreditation/recognition.

The Ad Hoc Committee subsequently focused on types of institutions that may sponsor advanced dental education programs. It was noted that in five (5) of the 14 advanced dental education programs within the Commission's purview, the Standards permit the program's sponsor to be an educational institution, hospital, or health care organization (with/without affiliation with an accredited hospital, as specified in the Standards). In the remaining nine (9) advanced education disciplines, the sponsor must be an educational institution or hospital. All standards permit United States military programs to sponsor advanced dental education programs, as specified in the Standards.

The Ad Hoc Committee discussed the issue of institutional sponsor given current Health Resources and Services Administration (HRSA) grant opportunities for health care organizations that may sponsor advanced dental education programs. The Ad Hoc Committee discussed the term "health care organization" at length, including the type of entity that may be classified within this category and whether a definition of health care organization should be included in the CODA Standards. The Committee believed that a definition should be included in the Commission's Definition of Terms, to ensure clarity and transparency in the type of organization that is permitted to sponsor an advanced dental education program, for those standards that currently include the term "health care organization" and those where the term may be adopted and implemented at a future date.

While discussing health care organizations that may sponsor advanced dental education programs, there continued to be discussion and concern that these sponsors have appropriate educational validity and expertise to carry out an academic program at the postdoctoral level. The Ad Hoc Committee considered whether all health care organizations should also have an affiliation with an academic institution to ensure educational quality. In discussion, it was noted that affiliations may exist (absent a need for co-sponsorship); however, many health care organizations currently offering CODA-accredited advanced dental education programs are not directly affiliated with academic institutions.

Following lengthy discussion over two (2) meetings, the Ad Hoc Committee determined that a definition of “Health Care Organization” and potential inclusion of “health care organization” as an acceptable sponsoring institution warrants further input from the Commission’s Review Committees. The Ad Hoc Committee recommended circulation of the proposed Definition of Terms for Health Care Organization and proposed revision to Standards related to institutional sponsors to include health care organizations (**Appendix 1**) be circulated to all Review Committees in Advanced Dental Education for consideration at the Summer 2023 Commission meetings, with a report to the Commission in Summer 2023. The Review Committees should provide comment on the potential definition and inclusion of this term within their discipline-specific standards. The Committee also noted that a Review Committee’s recommendation to revise the Standards would require a period of public comment and further consideration at a future Commission meeting, following the Commission’s consideration in Summer 2023.

Charter/License to Operate and Offer Instruction: The Ad Hoc Committee also considered the current language in nine (9) advanced dental education programs’ Accreditation Standards, which states: “*Advanced dental education programs **must** be sponsored by institutions, which are properly chartered, and licensed to operate and offer instruction leading to degrees, diplomas or certificates with recognized education validity.*”

The Committee noted that the advanced dental education Standards for advanced education in general dentistry, dental anesthesiology, general practice residency, oral medicine, and orofacial pain do not currently include this requirement or an equivalent Standard. These five (5) disciplines recently reviewed their Accreditation Standards documents and tabled the discussion regarding inclusion of this requirement pending final recommendations of this Ad Hoc Committee and the Commission.

Again, the Ad Hoc Committee initiated its discussion with a review of materials provided by the advisor, noting that words such as “chartered,” “licensed,” and “validity” have very distinct legal meanings. The term “authorization” is often used in higher education to indicate that an institution can confer a degree. Chartering and licensing often have to do with legal entities and do not necessarily indicate authority to award a degree, diploma or certificate with recognized education validity. The Ad Hoc Committee also noted the confusion related to this requirement from both the institution’s/program’s perspective and that of the CODA site visitor.

The Ad Hoc Committee believed the intent of this Standard is to ensure educational validity, which in dental education is granted through the accreditation process undertaken by the Commission on Dental Accreditation. Additionally, the conferring of a degree is mandated through institutional accreditation, while conferring of a post-doctoral certificate or diploma is a state or federal function.

Following lengthy discussion, the Ad Hoc Committee concluded that the intent of the requirement is to ensure that the sponsoring organization has the appropriate authority to operate and, as applicable, the necessary approvals to award either a certificate or a degree. As such, the

Ad Hoc Committee believed that the prior requirement should be stricken from all advanced dental education Standards and replaced with a new requirement, which states (underline indicates addition): Advanced dental education programs conferring a certificate **must** have state or federal approval to operate and, as applicable, to confer a certificate. Advanced dental education programs conferring a degree **must** have institutional accreditation and authority to confer a degree. The Committee noted that an advanced dental education program conferring a certificate must have state or federal approval to operate and, if needed based on its specific jurisdiction (i.e., state or federal regulations), it may also need approval to award a certificate. Likewise, an advanced dental education program awarding a degree will be required to show institutional accreditation providing it the authority to do so.

Following consideration, the Ad Hoc Committee recommended circulation of the proposed revision to Standards related to chartering and licensure to operate (**Appendix 1**) be circulated to all Review Committees in Advanced Dental Education for consideration at the Summer 2023 Commission meetings, with a report to the Commission in Summer 2023. The Committee also noted that a Review Committee's recommendation to revise the Standards would require a period of public comment and further consideration at a future Commission meeting, following the Commission's consideration in Summer 2023.

Summary: As directed by the Commission, the Ad Hoc Committee to Consider Advanced Dental Education Delivery Models reviewed the changing landscape of health care delivery centers that may sponsor advanced dental education programs. Following discussion, the Ad Hoc Committee believed that proposed revisions to the educational Standards for all advanced dental education programs within the Commission's purview may be warranted; however, further input from each advanced dental education Review Committee is needed to determine the impact, if any, on the discipline(s).

Ad Hoc Committee Recommendation: It is recommended that the Commission on Dental Accreditation direct all advanced dental education Review Committees to consider the proposed revisions to advanced dental education Standards found in **Appendix 1**, related to sponsoring organization and authority to operate, for possible adoption and implementation, with a report to the Commission in Summer 2023.

Commission Actions:

**PROPOSED REVISIONS TO EDUCATIONAL STANDARDS FOR
ADVANCED DENTAL EDUCATION PROGRAMS RELATED
TO EDUCATION DELIVERY MODELS**

Additions are underlined; Deletions are ~~stricken~~

PROPOSED REVISIONS FOR ALL ADVANCED DENTAL EDUCATION STANDARDS:

Definition of Terms:

Health Care Organization: A Federally Qualified Health Center (FQHC), Indian Health Service (IHS), Veterans Health Administration system (VA), or academic health center/medical center/ambulatory care center (both public and private) that is accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS).

PROPOSED REVISIONS FOR STANDARD 1-1 FOR GENERAL PRACTICE RESIDENCY AND DENTAL ANESTHESIOLOGY:

The program **must** be sponsored or co-sponsored by either a United States-based hospital, or educational institution or health care organization that is affiliated with an accredited hospital. Each sponsoring and co-sponsoring institution **must** be accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS).

United States military programs not sponsored or co-sponsored by military medical treatment facilities, United States-based educational institutions, hospitals or health care organizations accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS) **must** demonstrate successful achievement of Service-specific organizational inspection criteria.

Examples of evidence to demonstrate compliance may include:

- Accreditation certificate or current official listing of accredited institutions from a United States Department of Education recognized accreditation organization
- Evidence of successful achievement of Service-specific organizational inspection criteria
- Accreditation certificate or current official listing of accredited institution from an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS). For example: Accreditation Association for Ambulatory Health Care (AAAHC); Accreditation Commission for Health Care, Inc. (ACHC); American Association for Accreditation of Ambulatory Surgery Facilities (AAAASF); American Osteopathic Association Healthcare Facilities Accreditation Program (AOA/HFAP); Center for Improvement in Healthcare Quality (CIHQ); Community Health Accreditation Program (CHAP); DNV GL-Healthcare (DNV GL); National Dialysis Accreditation Commission (NDAC); The Compliance Team (TCT); The Joint Commission (JC).

Advanced dental education programs conferring a certificate **must** have state or federal approval to operate and, as applicable, to confer a certificate. Advanced dental education programs conferring a degree **must** have institutional accreditation and authority to confer a degree.

Examples of evidence to demonstrate compliance may include:

- State license or federal authority documenting the institution's approval to operate and confer a credential
- Institutional accreditation indicating approval to confer a degree

PROPOSED REVISIONS FOR STANDARD 1-1 FOR ADVANCED EDUCATION IN GENERAL DENTISTRY, ORAL MEDICINE, AND OROFACIAL PAIN:

Each sponsoring or co-sponsoring United States-based educational institution, hospital or health care organization **must** be accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS).

United States military programs not sponsored or co-sponsored by military medical treatment facilities, United States-based educational institutions, hospitals or health care organizations accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS) **must** demonstrate successful achievement of Service-specific organizational inspection criteria.

Examples of evidence to demonstrate compliance may include:

- Accreditation certificate or current official listing of accredited institutions [from a United States Department of Education recognized accreditation organization](#)
- Evidence of successful achievement of Service-specific organizational inspection criteria
- [Accreditation certificate or current official listing of accredited institution from an accreditation organization recognized by the Centers for Medicare and Medicaid Services \(CMS\). For example: Accreditation Association for Ambulatory Health Care \(AAAHC\); Accreditation Commission for Health Care, Inc. \(ACHC\); American Association for Accreditation of Ambulatory Surgery Facilities \(AAAASF\); American Osteopathic Association Healthcare Facilities Accreditation Program \(AOA/HFAP\); Center for Improvement in Healthcare Quality \(CIHQ\); Community Health Accreditation Program \(CHAP\); DNV GL-Healthcare \(DNV GL\); National Dialysis Accreditation Commission \(NDAC\); The Compliance Team \(TCT\); The Joint Commission \(JC\).](#)

[Advanced dental education programs conferring a certificate **must** have state or federal approval to operate and, as applicable, to confer a certificate. Advanced dental education programs conferring a degree **must** have institutional accreditation and authority to confer a degree.](#)

Examples of evidence to demonstrate compliance may include:

- [State license or federal authority documenting the institution's approval to operate and confer a credential](#)
- [Institutional accreditation indicating approval to confer a degree](#)

PROPOSED REVISIONS FOR STANDARD 1 FOR DENTAL PUBLIC HEALTH, ENDODONTICS, ORAL AND MAXILLOFACIAL PATHOLOGY, ORAL AND MAXILLOFACIAL RADIOLOGY, ORTHODONTICS AND DENTOFACIAL ORTHOPEDICS, ORAL AND MAXILLOFACIAL SURGERY, PEDIATRIC DENTISTRY, PERIODONTICS, AND PROSTHODONTICS:

Standard 1-Institutional Commitment/Program Effectiveness

~~Advanced dental education programs must be sponsored by institutions, which are properly chartered, and licensed to operate and offer instruction leading to degrees, diplomas or certificates with recognized education validity.~~ Hospitals that sponsor advanced dental education programs **must** be accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS). Educational institutions that sponsor advanced dental education programs **must** be accredited by an agency recognized by the United States Department of Education. Health care organizations that sponsor advanced dental education programs **must** be accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS). The bylaws, rules and regulations of hospitals or health care organizations that sponsor or provide a substantial portion of advanced dental education programs **must** assure that dentists are eligible for medical staff membership and privileges including the right to vote, hold office, serve on medical staff committees and admit, manage and discharge patients.

United States military programs not sponsored or co-sponsored by military medical treatment facilities, United States-based educational institutions, hospitals or health care organizations accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS) **must** demonstrate successful achievement of Service-specific organizational inspection criteria.

Examples of evidence to demonstrate compliance may include:

- Accreditation certificate or current official listing of accredited institutions from a United States Department of Education recognized accreditation organization
- Evidence of successful achievement of Service-specific organizational inspection criteria
- Accreditation certificate or current official listing of accredited institution from an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS). For example: Accreditation Association for Ambulatory Health Care (AAAHC); Accreditation Commission for Health Care, Inc. (ACHC); American Association for Accreditation of Ambulatory Surgery Facilities (AAAASF); American Osteopathic Association Healthcare Facilities Accreditation Program (AOA/HFAP); Center for Improvement in Healthcare Quality (CIHQ); Community Health Accreditation Program (CHAP); DNV GL-Healthcare (DNV GL); National Dialysis Accreditation Commission (NDAC); The Compliance Team (TCT); The Joint Commission (JC).

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