

COMMISSION ON DENTAL ACCREDITATION UPDATE ON RE-RECOGNITION BY THE UNITED STATES DEPARTMENT OF EDUCATION

Background: The United States Department of Education (USDE) publishes a list of Nationally Recognized Accrediting Agencies and Associations, which is used to determine eligibility for U.S. federal funding or government assistance under certain legislation. Agencies and associations included on the USDE list are those determined to be the reliable authorities in evaluating the quality of education offered by educational institutions or programs. In order for institutions to become eligible for federal funds, the accrediting agency for that institution must be recognized by the USDE. The authority and recognition responsibility of the USDE is governed by the Higher Education Act (HEA) of 1965, as amended. This legislation is periodically reauthorized. Following each reauthorization, the Department promulgates new Procedures and Criteria for Recognition of Accrediting Agencies. The Secretary of Education requires the Commission on Dental Accreditation (CODA) to submit to the USDE the standards, policies and procedures used in CODA's accreditation program. Periodic reviews by the USDE are conducted to determine the Commission's continued eligibility for recognition. Prior to the current review, the Commission was last reviewed in 2017 and has been recognized since the first recognition list was published in 1952.

Petition Submission and Review: On September 18, 2020, the Commission submitted its petition which documented CODA's compliance with the USDE recognition criteria. Unlike the prior re-recognition that was a focused review, in this cycle the USDE required accrediting agencies to address all recognition criteria. In August 2021, the USDE staff analyst conducted a detailed and comprehensive file review of the Commission. The draft analyst report was sent to the Commission on October 21, 2021, and further documentation for 16 criteria or their subparts was submitted to the USDE by the Commission on April 21, 2022. During this same time, in January 2022, the USDE staff analyst observed meetings of the Commission's Review Committees.

The final USDE staff analyst report of June 2022 indicated the Commission was substantially compliant and recommended renewal for five (5) years, with a monitoring report in 12 months related to one (1) recognition criteria. The Department staff would initiate a mid-cycle review if the monitoring report did not demonstrate the Commission's compliance.

On Wednesday, July 20, 2022, the Commission Chair, Dr. Sanjay Mallya, Director, Dr. Sherin Took, and Legal Counsel, Ms. Cathryn Albrecht, attended the National Advisory Committee on Institutional Quality and Integrity (NACIQI) meeting, which was conducted via a virtual meeting. At the meeting, NACIQI members questioned the Commission representatives on the organization's compliance with the criteria for recognition. Following review, the NACIQI members took action to recommend that CODA be granted full recognition for a period of five (5) years, without monitoring.

Subsequent to the NACIQI meeting, on August 3, 2022, the Deputy Under Secretary of Education and the Commission received a letter (comment) submitted by the Counsel for the Office of

Postsecondary Education on behalf of the staff of the Office of Postsecondary Education regarding CODA's pending petition, noting that the Department staff was submitting a comment to withdraw its prior recommendation and, consistent with NACIQI's recommendation, to recommend that the Deputy Under Secretary find ADA-CODA fully compliant with § 602.15(a)(4) and renew the agency's recognition for five (5) years without condition.

On October 19, 2022, the Commission received a letter from Mr. Jordan Matsudaira, Deputy Under Secretary, U.S. Department of Education, notifying the Commission that the agency had been recognized for a period of five (5) years with a requirement that the agency submit a monitoring report 12 months from the date of the letter, in accordance with the recommendation of Department staff. On October 20, 2022, the Commission contacted the Deputy Under Secretary to request a reconsideration of CODA's renewal status based upon the August 3, 2022 letter submitted by the Office of Postsecondary Education to withdraw its prior recommendation.

On October 21, 2022, the Commission received a letter from Mr. Jordan Matsudaira, Deputy Under Secretary, U.S. Department of Education, notifying the Commission that the agency had been recognized for a period of five (5) years with the following scope of recognition:

***Scope of Recognition:** The accreditation of predoctoral dental education programs (leading to the D.D.S. or D.M.D. degree), advanced dental education programs, and allied dental education programs that are fully operational or have attained "Initial Accreditation" status, including programs offered via distance education.*

The Department of Education's final action letter to the Commission is attached as **Appendix 1**.

Recommendation: This report is informational in nature and no action is required.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE UNDER SECRETARY

Friday, October 21, 2022

Dr. Sherin Tooks, Director
American Dental Association, Commission on Dental Accreditation
211 East Chicago Ave.
Chicago, IL 60611

Dear Dr. Tooks:

I am writing to inform you of my decision on the renewal of recognition of the American Dental Association, Commission on Dental Accreditation (ADA). U.S. Department of Education (Department) staff and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) have each made recommendations to me. These recommendations were made under sections 114 and 496 of the Higher Education Act of 1965, as amended, and pursuant to relevant statutory and regulatory provisions.

In their final staff report, Department staff found ADA in substantial compliance and recommended that I renew the Agency's recognition for 5 years and require the Agency to submit a monitoring report 12 months from the date of this decision to include rosters for each site visit conducted during the 12-month period that clearly identify each person and their role on each site visit team. Should the monitoring report fail to demonstrate ADA's compliance with 34 C.F.R. 602.15(a)(4), Department staff recommend initiating a mid-cycle review in accordance with 34 C.F.R. 602.33. During the July 2022 meeting, NACIQI recommended that I approve the Agency's request for renewal of recognition. By letter of August 3, 2022, Department staff revised their original recommendation, removing the monitoring report requirement, and recommending that I renew recognition for a period of 5 years. I concur with the NACIQI recommendation and the revised recommendation of the Department staff, and accordingly, I approve the ADA application for continued recognition as a programmatic accreditor of certain dental education programs for a period of 5 years.

Scope of Recognition: The accreditation of predoctoral dental education programs (leading to the D.D.S. or D.M.D. degree), advanced dental education programs, and allied dental education programs that are fully operational or have attained "Initial Accreditation" status, including programs offered via distance education.

Sincerely,

Jordan Matsudaira

Digitally signed by Jordan
Matsudaira
Date: 2022.10.21 09:24:08 -0400

Jordan Matsudaira

cc: Dr. Sanjay Mallya, Vice Chairman