

**INFORMATIONAL REPORT ON FREQUENCY OF CITINGS OF ACCREDITATION
STANDARDS FOR ADVANCED DENTAL EDUCATION PROGRAMS IN
DENTAL PUBLIC HEALTH**

Background: The Accreditation Standards for Advanced Dental Education Programs in Dental Public Health were approved by the Commission on Dental Accreditation on August 3, 2018 with immediate implementation. Since that date, 14 dental public health site visits have been conducted by a visiting committee of the Commission utilizing the August 2018 Standards. At the time of this report, the Standards include 71 “must” statements addressing 99 required areas of compliance. This report presents the number of times areas of non-compliance were cited by visiting committees conducting site visits from August 3, 2018 through October 31, 2023. If special (focused or comprehensive), pre-enrollment or pre-graduation site visits were conducted during this period, citings from those visits are also included.

Analysis: The distribution of citings found in **Appendix 1** indicates a total of 12 areas of non-compliance have been made. The most frequently cited dental public health-specific area of non-compliance, with two (2) citings, is the August 2018 version of Standard 2-4, which requires all faculty, including those at major and minor educational activity sites, to be trained to a standard to ensure consistency in training and evaluation of students/residents that supports the goals and objectives of the program. A revision to this Standard was adopted in February 2023 for implementation July 1, 2023.

Summary: The Commission will continue to receive reports annually summarizing the updated data on the frequency of citings of individual Standards.

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

**ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION
PROGRAMS IN DENTAL PUBLIC HEALTH**

Frequency of Citings Based on Required Areas of Compliance

Total Number of Programs Evaluated: 14
August 3, 2018 through October 31, 2023

STANDARD 1- INSTITUTIONAL COMMITMENT/PROGRAM EFFECTIVENESS – 26
Required Areas of Compliance

<u>Non-Compliance Citings</u>	<u>Accreditation Standard</u>	<u>Required Areas of Compliance</u>
1	1	The program must develop clearly stated objectives appropriate to advanced dental education, addressing education, patient care, research and service.
1	1	Planning for, evaluation of and improvement of educational quality for the program must be broad-based, systematic, continuous and designed to promote achievement of the program goals related to education, patient care, research and service.
1	1-2	All arrangements with sites where educational activity occurs, not owned by the sponsoring institution, must be formalized by means of current written agreements that clearly define the roles and responsibilities of the parties involved.
1	1-2	The following items must be covered in such inter-institutional agreements:
1	a.	Designation of a single program director;
1	b.	The teaching staff;
1	c.	The educational objectives of the program;
1	d.	The period of assignment of students/residents; and
1	e.	Each institution’s financial commitment.

STANDARD 2- PROGRAM DIRECTOR AND TEACHING STAFF - 8 Required Areas of Compliance

<u>Non-Compliance Citings</u>	<u>Accreditation Standard</u>	<u>Required Areas of Compliance</u>
1	2-2	There must be an advisory committee composed of individuals knowledgeable in the field of dental public health to assist the program director in the development, revision and evaluation of each student’s/resident’s residency curriculum plan, periodic assessment of each student’s/resident’s progress, final assessment of the degree of attainment of the plan’s goals, as well as periodic review of the residency program itself.
2	2-4 (August 2018 version)	All faculty, including those at major and minor educational activity sites when applicable, must be calibrated to ensure consistency in training and evaluation of students/residents that supports the goals and objectives of the program.
	2-4 (implemented July 1 2023)	All faculty, including those at major and minor educational activity sites, must be trained to a standard to ensure consistency in training and evaluation of students/residents that supports the goals and objectives of the program.

STANDARD 3- FACILITIES AND RESOURCES – 8 Required Areas of Compliance

STANDARD 4- CURRICULUM AND PROGRAM DURATION –31 Required Areas of Compliance

STANDARD 5- ADVANCED EDUCATION STUDENTS – 21 Required Areas of Compliance

STANDARD 6- RESEARCH – 5 Required Areas of Compliance

CONSIDERATION OF PROPOSED REVISIONS TO ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION PROGRAMS RELATED TO SPONSORING INSTITUTION AND AUTHORITY TO OPERATE

Background: At its Winter 2022 meeting, the Commission on Dental Accreditation (CODA) directed the formation of an Ad Hoc Committee of all advanced dental education Commissioners to consider the changing landscape of health care delivery centers that may sponsor advanced dental education programs. The Ad Hoc Committee, which met on December 5, 2022 and January 25, 2023, was charged with two (2) primary considerations: 1) the topic of institutional sponsor, whether a sponsor is an academic institution, hospital, or health care organization, and 2) review of the standard found in some advanced dental education disciplines that requires the sponsor to have proper chartering/licensure to operate and offer instruction leading to a degree, diploma or certificate with recognized education validity.

Institutional Sponsor (Health Care Organizations): The Ad Hoc Committee discussed the types of 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.

It was also 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.

The Ad Hoc Committee determined that a definition of “Health Care Organization” and potential inclusion of “health care organization” as an acceptable sponsoring institution warrant further input from the Commission’s Review Committees to provide comment on the potential definition and inclusion of this term within their discipline-specific standards.

At the Commission’s Winter 2023 meeting, and following consideration of the Ad Hoc Committee’s recommendation, the Commission directed 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 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 Commission noted that the Review Committees should provide comment on the potential definition and inclusion of this term within their discipline-specific standards.

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.

Through discussion, the Ad Hoc Committee noted 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.

At the Commission's Winter 2023 meeting, and following consideration of the Ad Hoc Committee's report, the Commission directed that the proposed revision related to chartering and licensure to operate 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..

Summer 2023 Review Committee and Commission Meetings: At its Summer 2023 meeting, as directed by the Commission, the Review Committee on Dental Public Health Education (DPH RC) considered the proposed revision to the Accreditation Standards related to the Definition of Terms for Health Care Organization and to chartering and licensure to operate. The Review Committee noted that the proposed revisions provide further clarification of the types of institutions that may sponsor advanced dental education programs and requirements related to the authority to operate. Further, the DPH RC believed that the inclusion of the proposed definition and revisions in the Dental Public Health Accreditation Standards should have no impact on dental public health education programs. The DPH RC also believed circulation of the proposed revisions to the communities of interest to provide the opportunity for review and comment is warranted.

Following consideration, the DPH RC recommended that the Commission direct circulation of the proposed revisions found in **Appendix 1**, to the communities of interest for review and comment for one (1) year, with Hearings conducted in conjunction with the October 2023 American Dental Association (ADA) Annual Meeting and the March 2024 American Dental Education Association (ADEA) Annual Session with comments reviewed by the Review Committee and Commission at its Summer 2024 meetings. At its Summer 2023 meeting, the Commission on Dental Accreditation concurred with the recommendations of the Review Committee and directed circulation of the proposed revisions to the communities of interest for review and comment for one (1) year.

Summer 2024 Review Committee and Commission Meetings: As directed by the Commission, the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Dental Public Health (**Appendix 1**) were circulated for comment through June 1, 2024. The Commission received no (0) comments at the virtual hearing in conjunction with the ADA Annual Meeting. The Commission received no (0) comments at the virtual hearing in conjunction with the ADEA Annual Session. The Commission office received four (4) written comments prior to the June 1, 2024 deadline (**Appendix 2**).

Summary: At its Summer 2024 meeting, the Review Committee on Dental Public Health Education (DPH RC) is requested to consider the proposed revision to the Accreditation Standards related to the Definition of Terms for Health Care Organization and to chartering and licensure to operate **Appendix 1**, and all comments received by the Commission prior to the June 1, 2024 deadline (**Appendix 2**). If further revisions are warranted, the Commission may wish to circulate the modified revisions to the communities of interest for an additional comment period. Alternatively, if the proposed revisions are adopted, the Commission may wish to consider an implementation date.

Recommendation:

Commission on Dental Accreditation

At its Summer 2023 meeting, the Commission directed that the proposed revisions to Accreditation Standards for Advanced Dental Education Programs in Dental Public Health be distributed to the appropriate communities of interest for review and comment, with comment due June 1, 2024, for review at the Summer 2024 Commission meeting.

Written comments will only be accepted through the Commission's Electronic Comment Submission Portal at this link:

https://surveys.ada.org/jfe/form/SV_3HPDw4NdvHk7apE

Additions are Underlined;
~~Strikethroughs~~ indicate Deletions

Accreditation Standards for Advanced Dental Education Programs in Dental Public Health

**PROPOSED REVISIONS TO ACCREDITATION STANDARDS FOR ADVANCED
DENTAL EDUCATION PROGRAMS RELATED TO SPONSORING INSTITUTION
AND AUTHORITY TO OPERATE**

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 FOR DENTAL PUBLIC HEALTH, ENDODONTICS, ORAL AND MAXILLOFACIAL PATHOLOGY, ORAL AND MAXILLOFACIAL RADIOLOGY, ORTHODONTICS AND DENTOFACIAL ORTHOPEDICS (RESIDENCY), ORAL AND MAXILLOFACIAL SURGERY (RESIDENCY), 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).

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

Response Summary:

The Commission on Dental Accreditation directed that the proposed revisions of Accreditation Standards for Dental Public Health Education programs be distributed to the communities of interest for review and comment. The document is available at the [Commission website: https://coda.ada.org/standards#proposed-standards](https://coda.ada.org/standards#proposed-standards)

All communities of interest are invited to submit comment on the proposed revision through the link below. Please note that by submitting a comment you agree to the Commission publishing your name, title, affiliation and comment in a public forum through its policy reports at the meeting during which comments will be considered. The Commission will neither publish your contact information nor follow up with you related to the comment, including its successful or unsuccessful submission. Further, the Commission reserves the right to redact inappropriate and/or unprofessional comments.

Click next to submit a comment.

Q2. Please complete the requested information.

First Name	Lisa
Last Name	Kearney
Email	[REDACTED]
Title	NNOHA Board Member/Co-Chair of NNOHA's Policy and Advocacy Committee

Q3. Please select one of the following options that best describes you or your organization:

- Dental Organization/Dental Association

Q4. Is this an official comment from your organization?

- Yes. Please enter the name of your organization below.:
National Network for Oral Health Access (NNOHA)

Q5. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

Standard 1, Page 3 Comment: Sponsoring Organizations

Q6. Do you agree with the proposed revision?

- Agree

Q7. Enter your comment. Type or copy and paste in the text box below.

National Network for Oral Health Access (NNOHAA) has been providing proposed standards, training and technical assistance to safety-net oral health programs for almost thirty years. Sponsoring Institution and Authority to Operate our 5,000 members and are available through NNOHA's website, webinars, conferences, and quality improvement and evidence-based practice learning collaboratives to all safety-net programs across the country. On behalf of the underserved communities from regions across the United States, NNOHA would like to provide the following comments regarding the proposed changes to the CODA standards.

NNOHA strongly supports the proposed revision to include Teaching Federally Qualified Health Centers (FQHCs) as eligible sponsors of dental residency programs. The existing limitation on sponsorship to only a hospital system or educational institution is not reflective of our current health care delivery system nor training landscape.

Health Center residencies provide residents with a rich teaching experience due to the complex oral health needs of the patients they serve. It is clear from the literature that both medical and dental residents trained in rural and underserved areas tend to establish their careers near their place of residency or equivalent environments.¹ Health centers that incorporate residency training have expanded patient service and improved health outcomes.^{2,3} Residency programs in health centers can reduce the overall costs of residency training, as well.⁴

Research suggests that postgraduate dental training in primary care programs like health centers can impact access to dental care for vulnerable populations.⁵ More dentists are needed in community-based settings where they can treat underserved populations. This standard change has the potential to promote access to care for the population and provide oral health care to those who need it most. We urge CODA to include ACGME standards to approve accreditation for Teaching FQHCs to facilitate training in communities that need enhanced skills to improve access for low income and disadvantaged populations.

1 Teaching Health Center Graduate Medical Education (THCGME) Program Overview. Available at <https://www.thcgme.org/wp-content/uploads/2023/10/Flyer-THCGMEv9.7.23.pdf>.

2 Chen C, Chong N, Luo Q, Park J. Community Health Center Residency Training: Improving Staffing, Service, and Quality. *Fam Med*. 2021 Sep;53(8):689-696. doi: 10.22454/FamMed.2021.843335. PMID: 34587264. Available at <https://pubmed.ncbi.nlm.nih.gov/34587264/>.

3 Davis CS, Roy T, Peterson LE, Bazemore AW. Evaluating the Teaching Health Center Graduate Medical Education Model at 10 Years: Practice-Based Outcomes and Opportunities. *J Grad Med Educ*. 2022 Oct;14(5):599-605. doi: 10.4300/JGME-D-22-00187.1. PMID: 36274770; PMCID: PMC9580311. Available at <https://pubmed.ncbi.nlm.nih.gov/36274770/>.

4 Gassett L. Partnering with a Federally Qualified Health Center to Enhance the Resident Experience and Decrease Clinic Costs. *ECG Management Consultants*. February 2019. Available at <https://www.ecgmc.com/insights/article/2636/partnering-with-a-federally-qualified-health-center-to-enhance-the-resident-exper>.

5 Mertz EA, Bates T, Kottek A, Jura M, Werts M, Munson B, Vujcic M. Practice patterns of postgraduate trained dentists in the United States. *J Dent Educ*. 2022 Sep;86(9):1133-1143. doi: 10.1002/jdd.13072. PMID: 36165262. Available at <https://onlinelibrary.wiley.com/doi/10.1002/jdd.13072>.

Q8. Do you have additional comment?

- YES, I have additional comment.

Q9. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

Standard 1, Page 4 Comment: Conferring a Certificate or Degree

Q10. Do you agree with the proposed revision?

- Disagree

Q11. Enter your comment. Type or copy and paste in the text box below.

The standard states, "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"

The requirements for supplying evidence of the ability to confer a certificate (or degree) are vague. Is an institution or organization's commitment to conferring a completion certificate adequate? The process and oversight by different state agencies is highly variable across state lines. We strongly feel that authority to grant a Certificate of Completion must rest solely with the individual program with no need to demonstrate authority from a State license or federal entity. Further, if this Standard change is adopted, we seek clarification and examples from the Commission on specific authorities, consistent across all states, that currently grant such approval from which the evidence would be sufficient. Also, this requirement is a diversion from the requirements in medicine. ACGME does not require programs to confer a certificate. The requirements should not differ between medical and dental residents.

If an authority outside of the residency is needed for a program to confer a certificate, we fear that of the already developing 25 dental residencies, few health centers will be able to find the sponsorship required in this newly proposed Standard. It will also place undo barriers for those residencies already established in health centers and for future health centers attempting to create residencies. We have strong concerns about the impact of these policies on existing dental residencies hosted within health centers, many of which have operated for decades safely and brought unquantifiable access to underserved patients across America and trained and retained high hundreds of dentists to work the dental safety net.

Q12. Do you have additional comment?

- YES, I have additional comment.

Q13. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

Page 2: Definition of Health Care Organization - Comment: Omission of HRSA Accrediting Bodies

Q14. Do you agree with the proposed revision?

- Agree

Q15. Enter your comment. Type or copy and paste in the text box below.

While we agree with the need to add this definition of Teaching Health Centers (THCs) to the standards, we believe an important addition is necessary. Federally sponsored health centers undergo extensive compliance review with the Health Resources and Services Administration (HRSA).⁶ Some THCs pursue ambulatory health center accreditation or patient-centered medical home recognition through the National Commission on Quality Assurance (NCQA), Accreditation Association for Ambulatory Health Care (AAAHC), or The Joint Commission (JC).⁷ Of these, NCQA is not one of the CMS-recognized accrediting bodies.⁸ The accreditation agencies focus on patient safety and service and operational and financial sustainability similar to the CMS-approved accrediting organizations. We believe the HRSA-recognized accrediting bodies – including HRSA’s process to enter the Health Center Program – should be included in the list of allowable accrediting organizations.

We would also like to support the Teaching Health Centers (THCs) recommendation to include the HRSA Operational Site Visit as another evidence source to verify the quality of the residency sponsor.

⁶ <https://bphc.hrsa.gov/about-health-centers/how-become-health-center>

⁷ <https://bphc.hrsa.gov/initiatives/advancing-health-center-excellence/hrsa-accreditation-patient-centered-medical-home-recognition-initiative>

⁸ <https://www.cms.gov/medicare/provider-enrollment-and-certification/surveycertificationgeninfo/downloads/accrediting-organization-contacts-for-prospective-clients-.pdf>

We suggest the following modification to Definition, Page 2:

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) OR THE HEALTH RESOURCES AND SERVICES ADMINISTRATION.

We suggest the following modifications to Standard 1, Page 3:

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) OR THE HEALTH RESOURCES AND SERVICES ADMINISTRATION (HRSA)” and/or achieved compliance to the HRSA Operational Visit.

“Accreditation certificate or current official listing of accredited institution from an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS) OR THE HEALTH RESOURCES AND SERVICES ADMINISTRATION (HRSA) or certification of successful completion of the HRSA Operational Review.

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); THE NATIONAL COMMITTEE FOR QUALITY ASSURANCE (NCQA); National Dialysis Accreditation Commission (NDAC); The Compliance Team (TCT); The Joint Commission (JC).”; HRSA Health Center Program Site Visit Report demonstrating full compliance.

Q16. Do you have additional comment?

- I have NO additional comment and ready to submit.

Response Summary:

The Commission on Dental Accreditation directed that the proposed revisions of Accreditation Standards for Dental Public Health Education programs be distributed to the communities of interest for review and comment. The document is available at the [Commission website: https://coda.ada.org/standards#proposed-standards](https://coda.ada.org/standards#proposed-standards)

All communities of interest are invited to submit comment on the proposed revision through the link below. Please note that by submitting a comment you agree to the Commission publishing your name, title, affiliation and comment in a public forum through its policy reports at the meeting during which comments will be considered. The Commission will neither publish your contact information nor follow up with you related to the comment, including its successful or unsuccessful submission. Further, the Commission reserves the right to redact inappropriate and/or unprofessional comments.

Click next to submit a comment.

Q2. Please complete the requested information.

First Name	Nick
Last Name	Widmyer
Email	[REDACTED]
Title	Mr

Q3. Please select one of the following options that best describes you or your organization:

- Member of the Public

Q4. Is this an official comment from your organization?

- No. This is a personal comment.

Q5. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

1

Q6. Do you agree with the proposed revision?

- Agree

Q7. Enter your comment. Type or copy and paste in the text box below.

Help CHCs

Q8. Do you have additional comment?

Consideration of Proposed Standards Revisions Related to
Sponsoring Institution and Authority to Operate
Dental Public Health RC
CODA Summer 2024

- I have NO additional comment and ready to submit.
-

Q1. The Commission on Dental Accreditation directed that the proposed revisions of Accreditation Standards for Dental Public Health Education programs be distributed to the communities of interest for review and comment. The document is available at the [Commission website: https://coda.ada.org/standards#proposed-standards](https://coda.ada.org/standards#proposed-standards).

All communities of interest are invited to submit comment on the proposed revision through the link below. Please note that by submitting a comment you agree to the Commission publishing your name, title, affiliation and comment in a public forum through its policy reports at the meeting during which comments will be considered. The Commission will neither publish your contact information nor follow up with you related to the comment, including its successful or unsuccessful submission. Further, the Commission reserves the right to redact inappropriate and/or unprofessional comments.

Click next to submit a comment.

Q2. Please complete the requested information.

First Name	Annette
Last Name	Puzan
Email	[REDACTED]
Title	Manager, Dental Education & Licensure

Q3. Please select one of the following options that best describes you or your organization:

- College/University
- Dental or Dental-Related Education Program
- Federal Agency
- Dental Organization/Dental Association
- Dental/Healthcare Professional
- State Licensing Board
- Certifying Board/Organization
- Student (dental, allied dental or advanced dental)
- Member of the Public
- Other (Please specify)

Council on Dental Education and Licensure (CDEL)
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Q4. Is this an official comment from your organization?

Yes. Please enter the name of your organization below.

Council on Dental
Education and Licensure
(CDEL)

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Appendix 2
Subpage 8

Consideration of Proposed Standards Revisions Related to
Sponsoring Institution and Authority to Operate
Dental Public Health RC
CODA Summer 2024

No. This is a personal comment.

Q5. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

Accreditation Standards for Advanced Dental Education Programs in Dental Public Health

Q6. Do you agree with the proposed revision?

Agree

Disagree

Q7. Enter your comment. Type or copy and paste in the text box below.

The following comment is being submitted on behalf of the ADA Council on Dental Education and Licensure by Dr. Najia Usman, chair: A duty of the ADA Council on Dental Education and Licensure is to act as the agency of the Association in matters related to the accreditation of dental, advanced dental and allied dental education programs. Accordingly, at its January 2024 meeting, the Council considered and supported the proposed changes to the Accreditation Standards for Advanced Dental Education Programs in Dental Public Health. The Council appreciates the opportunity to submit comment on this important document.

Q8. Do you have additional comment?

YES, I have additional comment.

I have NO additional comment and ready to submit.

Q9. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

This question was not displayed to the respondent.

Q10. Do you agree with the proposed revision?

This question was not displayed to the respondent.

Q11. Enter your comment. Type or copy and paste in the text box below.

This question was not displayed to the respondent.

Q12. Do you have additional comment?

Q1. The Commission on Dental Accreditation directed that the proposed revisions of Accreditation Standards for Dental Public Health Education programs be distributed to the communities of interest for review and comment. The document is available at the [Commission website: https://coda.ada.org/standards#proposed-standards](https://coda.ada.org/standards#proposed-standards).

All communities of interest are invited to submit comment on the proposed revision through the link below. Please note that by submitting a comment you agree to the Commission publishing your name, title, affiliation and comment in a public forum through its policy reports at the meeting during which comments will be considered. The Commission will neither publish your contact information nor follow up with you related to the comment, including its successful or unsuccessful submission. Further, the Commission reserves the right to redact inappropriate and/or unprofessional comments.

Click next to submit a comment.

Q2. Please complete the requested information.

First Name	<input type="text" value="Rhonda"/>
Last Name	<input type="text" value="Stephens"/>
Email	<input type="text" value="REDACTED"/>
Title	<input type="text" value="NC Dental Public Health Residency Director"/>

Q3. Please select one of the following options that best describes you or your organization:

- College/University
- Dental or Dental-Related Education Program
- Federal Agency
- Dental Organization/Dental Association
- Dental/Healthcare Professional
- State Licensing Board
- Certifying Board/Organization
- Student (dental, allied dental or advanced dental)
- Member of the Public
- Other (Please specify)

Q4. Is this an official comment from your organization?

- Yes. Please enter the name of your organization below.
- No. This is a personal comment.

Q5. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

Consideration of Proposed Standards Revisions Related to
Sponsoring Institution and Authority to Operate

Definition of Terms, page 2, lines 1-5 and Standard 1, page 3, lines 7-10.

Dental Public Health RC
CODA Summer 2024

Q6. Do you agree with the proposed revision?

- Agree
 Disagree

Q7. Enter your comment. Type or copy and paste in the text box below.

I understand the desire to streamline and use consistent language across advanced education programs. However, some dental specialties, like dental public health, are unique in that they do not center on patient care, and there is even uniqueness among residency programs within a given specialty. Among the 16 currently accredited Dental Public Health Residency programs, 3 are sponsored by state or federal public health agencies (ie health and human service agencies) rather than academic institutions. Our programs provide experiences that not only prepare residents to practice dental public health, but to do so in lesser known/popular employment settings where their skillset is gravely needed. The proposed definition of the new term "Health Care Organization" would exclude public health agencies as sponsoring institutions. I currently serve as the Dental Public Health Residency Director for the NC program - sponsored by the state health department which is accredited by the national Public Health Accreditation Board (PHAB), neither of which are covered in the proposed revisions. I would recommend considering the following amendment to the revisions: Definition of Terms - Health Care Organization (lines 1-5): A Federally Qualified Health Center (FQHC), Indian Health Service (IHS), Veterans Health Administration system (VA), academic health center/medical center/ambulatory care center (both public and private), OR PUBLIC HEALTH AGENCY that is accredited by an agency recognized by the United States Department of Education, accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS), OR ACCREDITED BY A NATIONAL SERVICE-SPECIFIC ACCREDITATION ORGANIZATION. Standard 1 (lines 7-10): Health care organizations that sponsor advanced dental education programs must be accredited by an agency recognized by the United States Department of Education, accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS), OR ACCREDITED BY A NATIONAL SERVICE-SPECIFIC ACCREDITATION ORGANIZATION. My suggested language would only partially cover the two federal-based DPH residencies as public health agencies, but I cannot imagine how CODA would apply the accreditation requirement to a federal agency.

Q8. Do you have additional comment?

- YES, I have additional comment.
 I have NO additional comment and ready to submit.

Q9. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

This question was not displayed to the respondent.

Q10. Do you agree with the proposed revision?

This question was not displayed to the respondent.

Q11. Enter your comment. Type or copy and paste in the text box below.

This question was not displayed to the respondent.