

**INFORMATIONAL REPORT ON FREQUENCY OF CITINGS
OF ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION
PROGRAMS IN ORTHODONTICS AND DENTOFACIAL ORTHOPEDICS**

Background: The Accreditation Standards for Advanced Dental Education Programs in Orthodontics and Dentofacial Orthopedics were approved by the Commission on Dental Accreditation at its February 12, 2021, meeting and were implemented on July 1, 2022. Since that date, 18 site visits have been conducted by visiting committees of the Commission utilizing the July 2022 Standards. At the time of this report, the Standards include 85 “must” statements addressing 124 required areas of compliance. This report presents the number of times areas of non-compliance were cited by visiting committees conducting site visits from July 1, 2022, 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 is presented in **Appendix 1**. Standard 2-9 related to the faculty to student ratio in the entire program was the most frequently cited requirement, with three (3) citings. The Standards with two (2) citings each are Standard 2, which requires the program director to maintain documentation of program activities, and Standard 3-6, which requires clinical facilities be provided within the sponsoring institution or affiliated institution. There were no (0) citings in Standard 4 Curriculum and Program Duration, Standard 5 Advanced Dental Education Students/Residents, and Standard 6 Research. Due to the small number of citings, sixteen total, no further analysis can be made at this time.

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 ORTHODONTICS AND DENTOFACIAL ORTHOPEDICS**

Frequency of Citings Based on Required Areas of Compliance

Total Number Programs Evaluated: 18
July 1, 2022 through October 31, 2023

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

Noncompliance Citings	<u>Accreditation Standard</u>	Required Area of Compliance
1	1	The program must document its effectiveness using a formal and ongoing outcomes assessment process to include measures of advanced education student/resident achievement.
1	1-1	Graduates must receive instruction in the application of the principles of ethical reasoning, ethical decision making and professional responsibility as they pertain to the academic environment, research, patient care, and practice management.

STANDARD 2 – PROGRAM DIRECTOR & TEACHING STAFF – 22 Required Areas
of Compliance

Noncompliance Citings	<u>Accreditation Standard</u>	Required Area of Compliance
2	2	Documentation of all program activities must be ensured by the program director and available for review.
1	2-2	The program director position must be full-time as defined by the institution.
1	2-3	There must be evidence that sufficient time is devoted to the program by the director so that the educational and administrative responsibilities can be met.
1	2-5	For all appointments after July 1, 2009, the director must have had teaching experience in an academic orthodontic departmental setting for a minimum of two (2) years.

1	2-8	In addition to their regular teaching responsibilities with the department, fulltime faculty must have adequate time for their own professional development.
3	2-9	The program must ensure a minimum of one (1) full time equivalent (FTE) faculty to four (4) students/residents for the entire program, including clinical, didactic, administration, and research components.
1	2-10	For clinic coverage, the program must ensure no less than one (1) faculty to eight (8) students/residents to assure the number and time commitment of faculty is sufficient to provide full supervision of the clinical portion of the program.

STANDARD 3 – FACILITIES AND RESOURCES – 18 Required Areas of Compliance

Noncompliance Citings	<u>Accreditation Standard</u>	Required Area of Compliance
1	3	All students/residents, faculty and support staff involved in the direct provision of patient care must be continuously recognized/certified in basic life support procedures including cardiopulmonary resuscitation.
1	3-5	Adequate secretarial, clerical, dental auxiliary and technical personnel must be provided to enable students/residents to achieve the educational goals of the program.
2	3-6	Clinical facilities must be provided within the sponsoring or affiliated institution to fulfill the educational needs of the program.

STANDARD 4 – CURRICULUM AND PROGRAM DURATION – 47 Required Areas of Compliance

STANDARD 5 – ADVANCED DENTAL EDUCATION STUDENTS/RESIDENTS – 9 Required Areas of Compliance

STANDARD 6 – RESEARCH – 2 Required Areas of Compliance

**INFORMATIONAL REPORT ON FREQUENCY OF CITINGS OF
ACCREDITATION STANDARDS FOR CLINICAL FELLOWSHIP TRAINING
PROGRAMS IN CRANIOFACIAL AND SPECIAL CARE ORTHODONTICS**

Background: The Accreditation Standards for Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics were adopted and implemented by the Commission on Dental Accreditation on August 7, 2015. Since that date, nine (9) site visits have been conducted by visiting committees of the Commission utilizing the August 2015 Standards. At the time of this report, the Standards include 61 “must” statements addressing 90 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 7, 2015 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 is presented in **Appendix 1**. There were no (0) citings during the period covered by this report.

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 CLINICAL FELLOWSHIP TRAINING
PROGRAMS IN CRANIOFACIAL AND SPECIAL CARE ORTHODONTICS**

Frequency of Citings Based on Required Areas of Compliance

Total Number Programs Evaluated: 9
August 7, 2015 through October 31, 2023

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

STANDARD 2 – PROGRAM DIRECTOR AND TEACHING STAFF – 14 Required
Areas of Compliance

STANDARD 3 – FACILITIES AND RESOURCES – 17 Required Areas of Compliance

STANDARD 4 – CURRICULUM AND PROGRAM DURATION – 14 Required Areas
of Compliance

STANDARD 5 – STUDENTS/FELLOWS – 9 Required Areas of Compliance

STANDARD 6 – FELLOWSHIP PROGRAMS – 13 Required Areas of Compliance

STANDARD 7 – RESEARCH – 1 Required Area 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.

Consideration of Proposed Standards Revisions Related to
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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 Orthodontics and Dentofacial Orthopedics Education (ORTHO 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 ORTHO RC noted that these changes are intended to ensure the educational validity of the institution sponsoring the advanced dental education program. The Review Committee also believed that the definition of health care organization helps better clarify which organizations would be eligible to sponsor advanced dental education programs. The ORTHO RC also noted the shifting of language and further clarity of expectations that the sponsor of an advanced dental education program has the authority to confer a certificate or degree. Following consideration, the ORTHO RC believed the proposed revisions should be circulated for a period of one (1) year for comment by CODA's communities of interest, with further consideration by the Review Committee and Commission in Summer 2024.

Following consideration, the ORTHO 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. Additionally, the Commission directed that the proposed revisions related to clinical fellowship programs found in **Appendix 2** be circulated 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 Orthodontics and Dentofacial Orthopedics (**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 one (1) written comment prior to the June 1, 2024 deadline.

Further, as directed by the Commission, the proposed revisions to the Accreditation Standards for Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics (**Appendix 2**) 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 one (1) written comment prior to the June 1, 2024 deadline.

Summary: At its Summer 2024 meeting, the Review Committee on Orthodontics and Dentofacial Orthopedics Education (ORTHO 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 (Residency)** and **Appendix 2 (Fellowship)**", and all comments received by the Commission prior to the June 1, 2024 deadline (**Appendix 3**). 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 Orthodontics and Dentofacial Orthopedics (Residency) 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_07KERlrD7jTgibP

Additions are Underlined
~~Strikethroughs~~ indicate Deletions

Accreditation Standards for Advanced Dental Education Programs in Orthodontics and Dentofacial Orthopedics (Residency)

Consideration of Proposed Standards Revisions Related to
Sponsoring Institution and Authority to Operate
Orthodontics and Dentofacial Orthopedics RC
CODA Summer 2024

**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).

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

Consideration of Proposed Standards Revisions Related to
Sponsoring Institution and Authority to Operate
Orthodontics and Dentofacial Orthopedics RC
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- (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

Commission on Dental Accreditation

At its Summer 2023 meeting, the Commission directed that the proposed revisions to Accreditation Standards for Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics 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_3t61Uvg45BCi1Df

Additions are Underlined
~~Strikethroughs~~ indicate Deletions

Accreditation Standards for Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics

Consideration of Proposed Standards Revisions Related to
Sponsoring Institution and Authority to Operate
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CODA Summer 2024

**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).

Consideration of Proposed Standards Revisions Related to
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PROPOSED REVISIONS FOR STANDARD 1 CLINICAL FELLOWSHIP TRAINING PROGRAMS IN CRANIOFACIAL AND SPECIAL CARE ORTHODONTICS:

Standard 1-Institutional Commitment/Program Effectiveness

Hospitals that sponsor fellowships **must** be accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS). Educational institutions that sponsor fellowships **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 fellowship 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 (AAAHHC); 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:

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

Q1. The Commission on Dental Accreditation directed that the proposed revisions of Accreditation Standards for Orthodontics and Dentofacial Orthopedics 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)

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 Orthodontics and Dentofacial Orthopedics (Residency)

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 Orthodontics and Dentofacial Orthopedics (Residency). 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 Clinical Fellowship training programs in Craniofacial and Special Care Orthodontics 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)

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 Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics

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 Clinical Fellowship Training Programs in Craniofacial and Special Care Orthodontics. 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?