

## REPORT OF THE STANDING COMMITTEE ON DOCUMENTATION AND POLICY REVIEW

**Background:** The Standing Committee on Documentation and Policy Review met via a virtual meeting on January 16, 2025. **Committee Members:** Ms. Lisa Mayer (chair), Dr. Scott De Rossi, Dr. Cherae Farmer-Dixon, Dr. Paul Luepke, Dr. Monica Nenad, and Dr. Glenn Sameshima were in attendance. Dr. Carolyn Brown and Dr. Nancy Rosenthal were unable to attend the meeting. **Commissioners:** Dr. Frank Licari, chair, and Dr. Cataldo Leone, vice-chair, Commission on Dental Accreditation (CODA), *ex officio*, also attended. **Commission Staff:** Dr. Sherin Tooks, senior director, Ms. Peggy Soeldner, senior manager, and Ms. Jamie Asher Hernandez, Ms. Jessica Lynk, Mr. Shawn Morrison, Dr. Yesenia Ruiz, Ms. Kelly Stapleton, and Ms. Taylor Weast, managers, CODA were in attendance. Ms. Samara Schwartz, senior associate general counsel, ADA/CODA, also attended the meeting.

Following review of the charge of the Standing Committee on Documentation and Policy Review, the Committee discussed proposed revisions to miscellaneous policies, noting that on occasion, outside of the regular policy review process, policies that may warrant revision are identified for discussion and possible revision. The policies considered at this meeting included the following: Review Committees and Review Committee Meetings, specifically related to review committee structure; Commission and Commission Meetings, sections related to Notice of Accreditation Actions to Programs/Institutions and Notice of Accreditation Actions to Communities of Interest; Policy on Professional Conduct and Prohibition Against Harassment; Site Visitors, sections on Appointments and Criteria for Nomination of Site Visitors, specifically related to Dental Therapy site visitors; and Policy Statement on Reporting and Approval of Sites Where Educational Activity Occurs.

Through discussion related to *Review Committees and Review Committee Meetings*, the Standing Committee was reminded that at the Summer 2024 meeting, through New Business, the Commission learned the membership of a few review committees will experience high turnover due to current appointment terms which expire concurrently. Therefore, the Commission directed the Standing Committee on Documentation and Policy Review to consider staggered review committee appointments with a report for the Winter 2025 meeting.

At this meeting the Committee reviewed the policy on Review Committees and Review Committee Meetings, specifically as related to review committee structure and confirmed it includes a statement that “Member terms will be staggered, four year appointments...” In addition, the Committee reviewed the current membership of the four (4) review committees that will experience high turnover at the end of October 2025. The four (4) committees are the Review Committees on Dental Public Health, Dental Anesthesiology, Oral Medicine and Orofacial Pain Education. The Committee briefly discussed the reason for the current membership turnover and learned that, for Dental Anesthesiology, Oral Medicine, and Orofacial Pain, the term assignments were all made at the same time due to the formation of these new review committees. To resolve this issue, the Committee believed that some Committee member

terms should be extended beyond the four-year term typically applied by the Commission. Following the term length adjustment period, the position will be on a rotating cycle with a new staggered term end. Following discussion, the Standing Committee concluded that adjustments to the end date of select review committee member terms should be made and recommended the revised membership term end dates, as presented in **Appendix 2**, be approved.

The Standing Committee also discussed the Commission's policy on *Commission and Commission Meetings, sections related to Notice of Accreditation Actions to Programs/Institutions and Notice of Accreditation Actions to Communities of Interest*. Through discussion, the Standing Committee learned Commission staff recently learned that the United States Department of Education (USDE) considers the Commission's "intent to withdraw" a "probation or equivalent" action, which requires the Commission to revise its policies and procedures related to notification to institutions/programs and communities of interest. The revision also requires a program on "intent to withdraw" to notify current and prospective students/residents/fellows of this action within seven (7) business days of notification from the Commission. Through discussion, the Commission reviewed Commission policy on *Commission and Commission Meetings, sections related to Notice of Accreditation Actions to Programs/Institutions and Notice of Accreditation Actions to Communities of Interest*, including the proposed revisions and concluded the proposed revisions as noted in **Appendix 1** are warranted and should be adopted.

The Standing Committee also considered a proposed revision to the title of the Commission's *Policy on Professional Conduct and Prohibition Against Harassment*. The Standing Committee learned there has been confusion regarding whether the policy also applies to educational programs. Upon review of the policy, the Standing Committee confirmed it states in sentence one, that the policy applies to Commission staff and volunteers and does not include educational programs. Therefore, the Committee believed revision to the policy itself is not warranted. However, the Committee believed revising the title of the policy would provide sufficient clarification. Therefore, the Standing Committee believed that the revision to the policy's title, as noted in **Appendix 1**, is warranted, and recommended the revision be adopted.

The Standing Committee reviewed the *Site Visitors* policy, sections on Appointments and Criteria for Nomination of Site Visitors. Regarding site visitor appointments, the Committee learned that for the past number of years, site visitor terms in all disciplines have been extended due to continued need for active site visitors to conduct accreditation site visits. The Committee agreed the need for active site visit continues and extension of site visitor terms should remain an option for review committees and the Commission. The Committee also reviewed the Site Visitors policy and noted the policy states the following regarding site visitor appointments: "All site visitor appointments are made annually for one year terms for a maximum of six consecutive years. Following the maximum appointment period of six consecutive years, the site visitor may reapply for appointment after one year. In exceptional circumstances the Review Committee may recommend that the Commission alter an individual's term limits." The Committee discussed whether revisions to the policy are warranted because of the presence of language that

allows for term alterations in “exceptional circumstances.” Following further discussion, the Committee believed that revisions to the policy found in **Appendix 1** provide further confirmation that site visitor terms can be extended, whether or not an “exceptional circumstance” exists. Further, the Committee believed the portion of the Commission’s policy related to removal of a site visitor should be repositioned in the policy to better align with the proposed revisions related to site visitor appointments. Therefore, the Standing Committee believes the revisions found in **Appendix 1** related to site visitor appointments should be adopted.

The Standing Committee also discussed the Criteria for Nomination of Site Visitors, specifically related to Dental Therapy site visitors. The Committee was informed that some of the language in this section of the policy may be unclear; however, the Committee concluded that revisions to the policy are not warranted at this time.

The Standing Committee reviewed the *Policy on Reporting and Approval of Sites Where Educational Activity Occurs*, specifically as it relates to service-learning/community service sites. The Committee was reminded that at its Summer 2024 meeting, the Committee discussed this policy, and after learning that proposed revisions to the Accreditation Standards for Dental Education Programs, including Standards related to community-based experience definitions and requirements would be considered by the Commission at its Summer 2024 meeting, the Standing Committee postponed further discussion of this policy until the proposed revisions had been considered. At the Summer 2024 meeting, the Commission agreed with the recommendation of the Standing Committee and directed further consideration for its Winter 2025 meeting.

At this meeting, the Standing Committee continued discussion of the Policy on Reporting and Approval of Sites Where Educational Activity Occurs related to service-learning/community service sites, as directed by the Commission. The Committee reviewed the Policy and noted the current policy includes the statement: “The use of service-learning/community service sites are exempt from reporting.” The Committee discussed that service learning/community service sites are utilized for a variety of purposes, vary in length, and could include didactic and/or clinical training. The Committee further discussed various scenarios utilizing service learning/community service sites, again being reminded that these types of sites are exempt from reporting, even if clinical activity occurs at these sites. Through discussion, the Committee agreed further clarification is warranted regarding the specific activities conducted at service-learning/community service sites that are exempt from reporting. These activities include service-learning/community service sites where patient education, patient screening or voluntary (non-credit) participation in patient care occurs. Therefore, the Committee recommended the proposed revisions regarding educational activity sites in **Appendix 1** be adopted.

**Standing Committee Recommendations:** It is recommended that the Commission on Dental Accreditation adopt and implement immediately the proposed revisions to the policy found in **Appendix 1**, including the revision of policy in the Commission’s

Evaluation and Operational Policies and Procedures manual and in all appropriate Commission documents.

It is further recommended that the Commission on Dental Accreditation approve the revised review committee member appointment terms for the Review Committees on Dental Public Health, Dental Anesthesiology, Oral Medicine and Orofacial Pain Education found in **Appendix 2**, including the revision of the information in all appropriate Commission documents, with immediate implementation.

It is further recommended that the Commission on Dental Accreditation direct Commission staff to inform the Review Committees on Dental Public Health, Dental Anesthesiology, Oral Medicine and Orofacial Pain, and applicable nominating dental association and board, of the modified Review Committee terms found in **Appendix 2**.

**Commission Action:**

1                   **MISCELLANEOUS COMMISSION ON DENTAL ACCREDITATION**  
2                   **POLICIES AND PROCEDURES FOR REVIEW**

3  
4 Underline indicates addition;  
5 Strikethrough indicates deletion  
6

7                   A. REVIEW COMMITTEES AND REVIEW COMMITTEE MEETINGS

- 8  
9 **1. Structure:** The chair of each Review Committee will be the appointed Commissioner from the  
10 relevant discipline.  
11 i. The Commission will appoint all Review Committee members.  
12       a. Review Committee positions not designated as discipline-specific will be appointed from  
13 the Commission where feasible, e.g. a public representative on the Commission could be  
14 appointed to serve as the public member on the Dental Laboratory Technology Review  
15 Committee; an ADA appointee to the Commission could be appointed to the Dental  
16 Assisting Review Committee as the general dentist practitioner.  
17       b. Discipline-specific positions on Review Committees will be filled by appointment by the  
18 Commission of an individual from a small group of qualified nominees (at least two)  
19 submitted by the relevant national organization, discipline-specific sponsoring  
20 organization or certifying board. Nominating organizations may elect to rank their  
21 nominees, if they so choose. If fewer than two (2) qualified nominees are submitted, the  
22 appointment process will be delayed until such time as the minimum number of required  
23 qualified nominations is received.  
24 ii. Consensus is the method used for decision making; however if consensus cannot be reached and a  
25 vote is required, then the Chair may only vote in the case of a tie (American Institute of  
26 Parliamentarians Standard Code of Parliamentary Procedures).  
27 iii. Member terms will be staggered, four year appointments; multiple terms may be served on the  
28 same or a different committee, with a one-year waiting period between terms. A maximum of  
29 two (2) terms may be served in total. The one-year waiting period between terms does not apply  
30 to public members.  
31 iv. One public member will be appointed to each committee. Following consideration of workload,  
32 public members may concurrently serve on more than one (1) review committee.  
33 v. The size of each Review Committee will be determined by the committee's workload.  
34 vi. As a committee's workload increases, additional members will be appointed while maintaining  
35 the balance between the number of content experts and non-content experts. Committees may  
36 formally request an additional member through New Business at Review Committee/Commission  
37 meetings. If an additional member is approved, this member must be a joint nomination from the  
38 professional organization and certifying board, as applicable.  
39 vii. Conflict of interest policies and procedures are applicable to all Review Committee members.  
40 viii. Review Committee members who have not been on a site visit within the last two (2) years prior  
41 to their appointment on a Review Committee should attend the Commission's site visitor training  
42 workshop within their first year of service on the Review Committee.  
43 ix. In the case of less than 50% of discipline-specific experts, including the Chair, available for a  
44 review committee meeting, for specified agenda items or for the entire meeting, the Review  
45 Committee Chair may temporarily appoint an additional discipline-specific expert(s) with the

1 approval of the CODA Director. The substitute should be a previous Review Committee member  
2 or an individual approved by both the Review Committee Chair and the CODA Director. The  
3 substitute would have the privileges of speaking, making motions, and voting.

4 x. Recommendations to the Commission from the Review Committee must be taken at meetings in  
5 which there is both a quorum and at least one (1) discipline-specific expert, other than the Chair,  
6 present.

7 xi. Consent agendas may be used by Review Committees, when appropriate, and may be approved  
8 by a quorum of the Review Committee present at the meeting.

9 Revised: 8/23; 8/22; 2/22; 8/20; 1/20; 8/18; 8/17; 2/15; 1/14, 2/13, 8/10, 7/09; 7/08; 7/07; Adopted: 1/06

## 11 COMMISSION AND COMMISSION MEETINGS

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14 **9. Notice Of Accreditation Actions To Programs/Institutions:** An institution will receive the formal  
15 notice, including the accreditation status awarded to the program, within thirty (30) days following the  
16 official meeting of the Commission. Actions resulting in other than “approval without reporting  
17 requirements” will be accompanied by the specific date(s) for submission of progress report(s) and/or  
18 notification that a special site visit will be conducted.

19  
20 When warranted, the Commission action may include a notification of its intent to withdraw a program’s  
21 accreditation and the time at which this intended action will be taken. When a program is notified of the  
22 Commission’s intent to withdraw accreditation, the Commission will provide written notification to the  
23 United States Department of Education, the appropriate State licensing or authorizing agency, and the  
24 appropriate accrediting agencies at the same time it notifies the institution or program of the decision.  
25 Additionally, the Commission requires that the institution/program disclose such an action, within seven  
26 (7) business days of receipt, to all current and prospective students/residents/fellows. The Commission  
27 also requires the program to submit to the Commission office evidence of communicating such notice to  
28 all current and prospective students/residents/fellows within seven (7) business days of the Commission’s  
29 written notification to the program. This notification will also advise the institution of an opportunity to  
30 submit additional information and that a special appearance (hearing) before the Commission or one of its  
31 Review Committees may be requested. If a program’s accreditation status is withdrawn, the institution is  
32 advised of its right to appeal the decision before the Appeal Board. For further information, refer to the  
33 Policy on Due Process in this manual.

34 Reaffirmed: 8/22; 8/17; 8/14; 8/10

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36 **11. Notice Of Accreditation Actions To Communities Of Interest:** In carrying out its responsibilities  
37 as an accrediting agency, the Commission on Dental Accreditation announces its decisions to grant, renew  
38 or discontinue (at an institution’s request) accreditation to the USDE Secretary, the appropriate state  
39 licensing or authorizing agency, appropriate accrediting agencies, the public, educational institutions,  
40 dental examining boards, related dental organizations, and the profession no later than thirty (30) days  
41 after it makes the decisions.

42  
43 The Commission publishes listings of accredited programs in predoctoral, advanced, and allied dental  
44 education. Lists of accredited programs are posted to the Commission’s website within thirty (30) days  
45 following a Commission meeting to be available to educational institutions’ executives and

1 administrators, the USDE, regional and appropriate national accrediting agencies, state licensing agencies  
2 and to other interested agencies and organizations.

3  
4 When warranted, the Commission may notify an institution of its intent to withdraw a program’s  
5 accreditation and the time at which this intended action will be taken. In these instances, the Commission  
6 will provide written notification to the United States Department of Education, the appropriate State  
7 licensing or authorizing agency, and the appropriate accrediting agencies at the same time it notifies the  
8 institution or program of the decision. Additionally, the Commission requires that the institution/program  
9 disclose such an action, within seven (7) business days of receipt, to all current and prospective  
10 students/residents/fellows. The Commission also requires the program to submit to the Commission  
11 office evidence of communicating such notice to all current and prospective students/residents/fellows  
12 within seven (7) business days of the Commission’s written notification to the program. the Commission  
13 provides written notice of the final decision to place a program on “intent to withdraw” accreditation to  
14 the USDE Secretary, the appropriate accrediting agencies, and the appropriate state licensing or  
15 authorizing agency within fourteen (14) days of the Commission’s decision. Notice to the public is  
16 provided through the listings of accredited programs that is available on the Commission’s website and is  
17 updated within fourteen (14) days of the Commission’s decision one (1) business day of providing the  
18 final notice to the program’s sponsoring institution.

19  
20 The Commission may also reach the decision to deny or withdraw the accreditation of a program. In  
21 these instances, the Commission provides written notice of the final decision to deny or withdraw  
22 accreditation to the USDE Secretary, the appropriate accrediting agencies, and the appropriate state  
23 licensing or authorizing agency at the same time it notifies the sponsoring institution of the decision.  
24 Notice to the public is provided through the listings of accredited programs that is available on the  
25 Commission’s website and is updated within one (1) business day of providing the final notice to the  
26 program’s sponsoring institution.

27 Revised: 4/22; 8/17; 2/15; Reaffirmed: 8/22; 8/14; 8/10

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30 **POLICY ON PROFESSIONAL CONDUCT AND PROHIBITION AGAINST HARASSMENT FOR**  
31 **COMMISSION STAFF AND VOLUNTEERS**

32 All staff members and volunteers must treat each other and all others with whom we work on behalf of  
33 the ADA<sup>1</sup> with integrity, courtesy and professionalism. It is ADA  
34 policy that all staff members and volunteers are responsible for  
35 assuring that the work place is free from improper harassment. With  
36 this policy, the ADA prohibits not only unlawful harassment, but  
37 also other unprofessional and discourteous actions. For example,  
38 rude, insulting, disrespectful, disruptive, uncivil and unprofessional  
39 comments or conduct will also not be tolerated.

**To Report a Potential Incident**  
If you believe you have experienced or have become aware of an incident of harassment or a violation of our professional conduct policy, report it as soon as possible to your supervisor and/or Human Resources at (312) 440-2005.

<sup>1</sup> For purposes of these HR protocols ‘the ADA’ collectively refers to the American Dental Association and its two affiliated organizations, the for-profit company ADA Business Enterprises, Inc. (ADABEI) and the not-for-profit educational and research focused ADA Foundation (ADAF).

1 Workplace harassment isn't limited to sexual harassment, and doesn't preclude same-gender harassment;  
2 it can occur between any two people - co-workers, managers, or even non-employees like clients,  
3 contractors, or vendors.

4 The ADA absolutely prohibits sexual harassment and harassment on the basis of one's status as a member  
5 of a legally-protected class, such as race, color, religion, sex (including pregnancy, childbirth and related  
6 medical conditions), gender, gender identify, national origin, age (40 or older), disability (mental or  
7 physical), sexual orientation, military status, genetic information, and marital status. These types of  
8 discriminatory harassment are prohibited by state and federal laws and may subject the ADA and/or the  
9 individual harasser to liability for any such unlawful conduct.

10 Offensive conduct may include, but is not limited to, offensive jokes, slurs, epithets or name calling,  
11 physical assaults or threats, intimidation, ridicule or mockery, insults or put-downs, offensive objects or  
12 pictures, unwelcome sexual advances, unwanted physical contact (including touching), and all other  
13 verbal, or physical conduct directed at an individual because of their status as a member of a protected  
14 class that is unwelcome and interferes with work performance. Such conduct constitutes unlawful  
15 harassment when:

- 16
- 17 • Submission to such conduct is made either implicitly or explicitly a condition of the individual's  
18 employment;
- 19 • Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's  
20 employment; or
- 21 • Such conduct is sufficiently severe or pervasive to alter the conditions of employment and to create a  
22 hostile or abusive working environment.

23 Each staff member and volunteer must exercise his or her own good judgment to avoid engaging in  
24 conduct that may be perceived by others as harassment. As an ADA staff member or volunteer, you are  
25 responsible for keeping our work environment free of all such harassment. If you believe that you have  
26 been harassed, or if you become aware of an incident of harassment, whether by an employee, a member,  
27 or a non-employee or non-member, you should report it as soon as possible to your supervisor, a  
28 volunteer leader, and/or to the Human Resources, (312-440-2005).

29 If the incident is reported to an employee's supervisor or a volunteer leader, the supervisor or volunteer  
30 leader must then report the incident to the head of ADA Human Resources. Do not allow an inappropriate  
31 situation to continue by not reporting it, regardless of who is creating that situation.

32 No staff member or volunteer in this organization is exempt  
33 from this policy. This policy applies to the immediate work  
34 place as well as to ADA related activity outside the ordinary  
35 work place, such as travel on ADA business, meetings  
36 outside the ADA building, email and telephone  
37 communications, and ADA-sponsored social or recreational  
38 events.

**\*\* Reminder to Supervisors and  
Volunteer Leaders\*\***

If you witness or are informed of a  
potential incident of harassment or  
violation of our professional conduct  
policy, you **MUST** report it to Human  
Resources at (312) 440-2005.



1 In response to every complaint, the ADA will take prompt investigatory actions and corrective and  
2 preventative actions where necessary. A staff member who brings such a complaint to the ADA in good  
3 faith will not be adversely affected as a result of reporting the harassment or objectionable conduct. All  
4 staff members should be aware that the privacy of the charging party and the person accused of the  
5 harassment will be protected to the extent consistent with effective enforcement of this policy.

6 The ADA will retain confidential documentation of all allegations and investigations. Any staff member or  
7 volunteer found to have violated this policy may be subject to disciplinary action up to and including  
8 discharge from employment with the ADA or removal from a volunteer position. Any memoranda regarding  
9 a determination that a violation of the Professional Conduct Policy and Prohibition against Harassment has  
10 occurred shall be placed in a staff member's personnel file. Effective: January 1, 2015

11 *Procedures Applicable to Professional Conduct Policy and Prohibition against Harassment*

- 12 a. If you believe that there has been a violation of the ADA's Professional Conduct Policy and  
13 Prohibition against Harassment (ADA's Policy) immediately contact your supervisor, or Human  
14 Resources.
- 15 b. If an incident is reported to a supervisor or volunteer leader, the supervisor or volunteer leader must  
16 then notify Human Resources of the incident.
- 17 c. In a timely and confidential manner, the ADA will conduct an investigation of any complaint that is  
18 made pursuant to the ADA's Policy. Human Resources will conduct an investigation, which includes  
19 interviewing witnesses with potential knowledge of the objectionable conduct.
- 20 d. It is the obligation of each staff member and volunteer to cooperate in these investigations by  
21 providing truthful, thorough information.
- 22 e. The alleged harasser is given an opportunity to relate his/her version of the events and to provide any  
23 information that the ADA should consider before it finalizes its investigation. If the alleged harasser  
24 refuses to participate, the ADA will base its decision on the other information gathered during the  
25 investigation, the inferences drawn from that evidence and the alleged harasser's unwillingness to  
26 cooperate in the interview.
- 27 f. Information obtained pursuant to the investigation is confidential and will be reported to those within  
28 the ADA on a "need to know" basis. The privacy of the complaining party and the person accused of  
29 the harassment will be protected to the extent consistent with effective enforcement of this Policy.
- 30 g. Attempting to influence the investigation or to disclose confidential information by discussing it with  
31 others can be cause for disciplinary action, up to and including discharge, except to the extent such  
32 disclosure may be legally permissible.
- 33 h. Human Resources, in consultation with legal counsel, will make a recommendation to the Executive  
34 Director as to whether there has been a violation of the ADA's Policy and whether corrective action, if  
35 any, should be taken.
- 36 i. Any staff member found to have violated the Professional Conduct Policy and Prohibition against  
37 Harassment will be subject to disciplinary action up to and including discharge. Any memoranda  
38 regarding violation of the Professional Conduct Policy and Prohibition against Harassment will be  
39 placed in the staff member's personnel file.

40 The ADA prohibits managers and supervisors from taking adverse job consequences against staff who engage  
41 in protected activities such as: 1) lodging a discrimination complaint or concern, 2) participating in an  
42 investigation of such a discrimination complaint or concern or 3) opposing employment practices that an  
43 employee reasonably believes discriminate against the employee or another staff member.

1 The ADA prohibits any form of retaliation against any staff member for making a bona fide complaint under  
2 this policy or for assisting in a complaint investigation. Any individual, however, whose complaint is  
3 determined to be false or made in bad faith, or supported by false information, may be subject to disciplinary  
4 action.

5 The ADA specifically reserves its right to change, modify or eliminate any of the provisions of its Procedures  
6 Applicable to the Professional Conduct Policy and Prohibition against Harassment Policy at any time with or  
7 without notice. Effective: January 1, 2015.

8 Revised: 8/15; 8/14; 7/09, 1/03, 7/97; Reaffirmed: 8/23; 8/18; /13; 8/10; CODA: 01/95:11  
9

## 10 J. SITE VISITORS

11 The Commission uses site visitors with education and practice expertise in the discipline or areas being  
12 evaluated to conduct its accreditation program. Nominations for site visitors are requested from national  
13 dental and dental-related organizations representing the areas affected by the accreditation process. Self-  
14 nominations are accepted. Site visitors are appointed by the Commission annually and may be re-appointed.  
15  
16

17 During the term of service as a Review Committee member, these individuals should not serve as site visitors  
18 for an actual accreditation site visit to an accredited or developing program, unless deemed necessary. Two  
19 instances when a review committee member could serve on a site visit include: 1) an inability to find a site  
20 visitor from the comprehensive site visitor list, or 2) when the review committee believes a member should  
21 attend a visit for consistency in the review process. This applies only to site visits that would be considered  
22 by the same review committee on which the site visitor is serving. Review committee members are  
23 prohibited from serving as independent consultants for mock accreditation purposes. These policies help  
24 avoid conflict of interest in the decision making process and minimize the need for recusals.  
25  
26

27 During the term of service as a commissioner, these individuals may not independently consult with a CODA-  
28 accredited program or a program applying for CODA accreditation. In addition, site visitors serving on the  
29 Commission may not serve on a site visit team during their terms.  
30

31 All other active site visitors who independently consult with educational programs accredited by CODA or  
32 applying for accreditation must identify all consulting roles to the Commission and must file with the  
33 Commission a letter of conflict acknowledgement signed by themselves and the institution/program with  
34 whom they consulted. Following service on the site visit team, an active site visitor is prohibited from  
35 independently consulting with the program that they evaluated within the past ten (10) years. All conflict of  
36 interest policies as noted elsewhere in this document apply. Contact the CODA office for the appropriate  
37 conflict of interest declaration form.  
38

39 Prior to a site visit, a list of site visitors and other participants is reviewed by the institution/program for  
40 conflict of interest or any other potential problem. The program/institution being site visited will be permitted  
41 to remove individuals from the list if a conflict of interest, as described in the Commission's Conflict of  
42 Interest Policy, can be demonstrated. Information concerning the conflict of interest must be provided in  
43 writing clearly stating the specifics of the conflict.  
44

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

8  
9 When appropriate, a generalist representative from a regional accrediting agency may be invited by the chief  
10 executive officer of an institution to participate in the site visit with the Commission's visiting committee. A  
11 generalist advises, consults and participates fully in committee activities during a site visit. The generalist's  
12 expenses are reimbursed by the institution. The generalist can help to ensure that the overall institutional  
13 perspective is considered while the specific programs are being reviewed.

14  
15 The institution is encouraged to invite the state board of dentistry to send a current member to participate in  
16 the site visit. If invited, the current member of the state board receives the same background materials as  
17 other site visit committee members and participates in all site visit conferences and executive sessions. The  
18 state board of dentistry reimburses its member for expenses incurred during the site visit.

19  
20 In addition to other participants, Commission staff member may participate on the visiting committee for  
21 training purposes. It is emphasized that site visitors are fact-finders, who report committee findings to the  
22 Commission. Only the Commission is authorized to take action affecting the accreditation status.

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

25 **1. Appointments:** All site visitor appointments are made annually for one year terms for a maximum of  
26 six consecutive years. Following the maximum appointment period of six consecutive years, the site  
27 visitor may reapply for appointment after one year. ~~In exceptional circumstances the~~ The Review  
28 Committee may recommend that the Commission alter an individual's term limits to exceed the period of  
29 six consecutive years. The Commission may remove a site visitor for failing to comply with the  
30 Commission's policies and procedures, continued, gross or willful neglect of the duties of a site visitor, or  
31 other just cause as determined by the Commission.

32  
33 Site visitors assist the Commission in a number of ways, including: developing accreditation standards,  
34 serving on special committees, and serving as site visitors on visits to predoctoral, advanced dental and  
35 allied dental education programs.

36  
37 The Commission reviews nominations received from its communities of interest, including discipline-  
38 specific sponsoring organizations and certifying boards. Individuals may also self-nominate. In addition to  
39 the mandatory subject expertise, the Commission always requests nominations of potentially under-  
40 represented ethnic groups and women, and makes every effort to achieve a pool of site visitors with broad  
41 geographic diversity to help reduce site visit travel expenses.

42  
43 Site visitors are appointed/reappointed annually and required to sign the Commission's Conflict of  
44 Interest Statement, the Agreement of Confidentiality, the Copyright Assignment, Licensure Attestation,  
45 and the ADA's Professional Conduct Policy and Prohibition Against Harassment. Site visitors must also  
46 complete annual training and will receive periodic updates on the Commission's policies and procedures

1 related to the Health Insurance Portability and Accountability Act (HIPAA). The Commission office  
 2 stores these forms for seven (7) years. In addition, site visitors must comply with training requirements,  
 3 the ADA's travel policy and other CODA Rules and Regulations. ~~The Commission may remove a site  
 4 visitor for failing to comply with the Commission's policies and procedures, continued, gross or willful  
 5 neglect of the duties of a site visitor, or other just cause as determined by the Commission.~~  
 6

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

9 Revised: 8/19; 8/18; 8/14; 7/08; Reaffirmed: 8/24; 8/10, 1/98, 8/02; CODA: 07/94:9, 01/95:10  
 10  
 11

## 12 S. POLICY STATEMENT ON REPORTING AND APPROVAL OF SITES WHERE EDUCATIONAL 13 ACTIVITY OCCURS

14 The Commission on Dental Accreditation recognizes that students/residents may gain educational  
 15 experiences in a variety of settings and locations.  
 16

17 An accredited program may use one or more than one setting or location to support student/resident  
 18 learning and meet Commission on Dental Accreditation standards and/or program requirements. The  
 19 Commission expects programs to follow the EOPP guidelines and accreditation standards when developing,  
 20 implementing and monitoring activity sites used to provide educational experiences.  
 21

### 22 **Reporting Requirements:**

23 The Commission on Dental Accreditation must be informed when a program accredited by the Commission  
 24 plans to initiate educational experiences in new settings and locations. Off-Campus training sites that are  
 25 owned by the sponsoring institution or where the sponsoring organization has legal responsibility and  
 26 operational oversight do not need prior approval before utilization but must be reported to the Commission  
 27 in accordance with the Policy on Reporting Program Changes in Accredited Programs.  
 28

| <b>Reporting Requirements for Off-Campus Sites</b> | <b>Major Activity Sites</b>  | <b>Minor Activity Sites</b>  | <b>Supplemental Activity Sites</b>   |
|--|--|--|--|
| Definitions  | Students/Residents <b>required</b> to complete an experience at this site to meet a program requirements or accreditation standards, and<br><br>Competency assessments or comparable summative assessments performed at the site | Students/Residents <b>required</b> to complete an experience at this or another site to meet a program requirements or accreditation standards, and<br><br>No competency assessments or comparable summative assessments | Student/Resident chooses whether to visit the site outside of the educational program (e.g. volunteer mission trips, health fair, etc. not used to fulfill program or accreditation requirements). |

|  |  |  |                         |
|--|--|--|-------------------------|
|  |  | performed at the site.<br>Evaluation may occur.  |                         |
| Program Report Requirement                 | Report required by <b>May 1 or November 1</b>  | Report required at least 30 days prior to planned implementation of educational activity site. | No report required.     |
| Acknowledgement/Approval                   | Commission approval required prior to implementation of the educational activity site. Approval of the major activity sites required prior to recruiting students/residents for the site and initiating use of the site. | Commission acknowledgement of review at the program's next site visit.                         | No approval required.   |
| Site Visit(s) to Educational Activity Site | Commission may direct special focused site visit to review educational activity site prior to or after approval of the site. Commission may review site at future site visits.   | Commission may visit educational activity site during program's next site visit.               | No site visit required. |

1 The Commission must ensure that the necessary education as defined by the standards is available, and  
2 appropriate resources (adequate faculty and staff, availability of patient experiences, and distance learning  
3 provisions) are provided to all students/residents enrolled in an accredited program. Generally, only  
4 programs without reporting requirements will be approved to initiate educational experiences at major  
5 activity sites.  
6

7 When the Commission has received notification that an institution plans to offer its accredited program at  
8 an off-campus educational activity site, the Commission may conduct a special focused site visit to each  
9 educational activity site where each student's/resident's educational experience is provided, based on the  
10 specifics of the program, the accreditation standards, and Commission policies and procedures, or if other

1 cause exists for such a visit as determined by the Commission. There may be extenuating circumstances  
2 when a special review is necessary.  
3

4 The program must report the rationale for adding an educational activity site and how that site affects the  
5 program's goals, objectives, and outcomes. For example, program goals, objectives, and outcome  
6 measures may address institutional support, faculty support, curriculum, student didactic and clinical  
7 learning, research, and community service. The program must support the addition of an educational  
8 activity site with trends from pertinent areas of its outcomes assessment program that indicates the  
9 rationale for the additional site.  
10

11 When conducting a review of the program, the Commission's site visit team will identify the sites to be  
12 visited based upon educational experiences at the site (for example based upon length of training at the site,  
13 educational experience or evaluation/competencies achieved). After the initial visit or review, each  
14 educational activity site may be visited during the regularly scheduled CODA evaluation visit to the program.  
15

16 **Discipline-specific Exemptions:**

17 The Commission recognizes that dental assisting and dental laboratory technology programs utilize  
18 numerous extramural private dental offices and laboratories to provide students with clinical/laboratory work  
19 experience. The program will provide a list of all currently used extramural sites in the self-study document.  
20 The Commission will then randomly select and visit facilities at the time of a site visit to the program. Prior  
21 Commission approval of these extramural dental office and laboratory sites will not be required.  
22

23 The Commission recognizes that dental public health programs utilize numerous off-campus sites to  
24 provide students/residents with opportunities to conduct their supervised field experience. The program  
25 will provide a list of all currently used sites in the self-study document. The visiting committee will select  
26 and visit facilities during the site visit to the program to evaluate compliance with CODA accreditation  
27 standards. Prior Commission approval of these supervised field experience sites will not be required.  
28 Programs where 30% or more of the overall student/resident training occurs at off-campus site(s) must  
29 report the off-campus site(s) under the Commissions *Policy Statement on Approval of Sites Where*  
30 *Educational Activity Occurs*.  
31

32 The Commission recognizes that advanced dental education programs in dental anesthesiology utilize  
33 numerous mobile ambulatory settings and rotations to provide residents with opportunities to gain  
34 required clinical experiences. The program will provide a list of all currently used settings and rotations  
35 in the self-study document. The visiting committee will randomly select and visit several settings and  
36 rotation locations during the site visit to the program to evaluate compliance with Commission on Dental  
37 Accreditation standards. Prior Commission approval of these settings and rotations will not be required.  
38

39 For predoctoral dental education programs, when primary program faculty travel with student(s) to a site  
40 and competency is assessed, the site may be treated as a minor site for reporting purposes.

41 The use of service-learning/community service sites where patient education, patient screening or  
42 voluntary (non-credit) participation in patient care occurs are exempt from reporting.  
43

1 Expansion of a developing dental hygiene program and/or current or developing dental assisting program  
2 will only be considered after the program has demonstrated success by graduating the first class, measured  
3 outcomes of the academic program, and received approval without reporting requirements.  
4

5 **Fees Related to the Use of Educational Activity Sites:**

6 All programs accredited by the Commission pay an annual fee. Additional fees will be based on actual  
7 accreditation costs incurred during the visit to and educational activity site. The Commission office  
8 should be contacted for current information on fees.  
9

10 **Commission on Dental Accreditation Consideration of Educational Activity Sites:**

11 The Commission uses the following process when considering reports for adding educational activity  
12 sites. Program administrators have the option of consulting with Commission staff at any time during this  
13 process.  
14

- 15 1. Depending upon the type of educational activity site established, a program administrator submits either:  
16 (1) the major educational activity site report **by May 1 or November 1** or (2) the minor educational  
17 activity site report at least thirty (30) days prior to planned implementation of educational activity site.
- 18 2. Commission staff reviews the report to assess its completeness and to determine whether the change  
19 could impact the program's potential ability to comply with the accreditation standards. If this is the  
20 case, whether the site is major or minor, the report is reviewed by the appropriate Review Committee  
21 for the discipline and by the Commission.
- 22 3. Receipt of the educational activity site report and accompanying documentation is acknowledged in  
23 one of the following ways:
  - 24 a. The program administrator is informed that the report will be reviewed by the appropriate Review  
25 Committee and by the Commission at their next regularly scheduled meeting. Additional  
26 information may be requested prior to this review if the change is not well-documented; or
  - 27 b. The program administrator is informed that the reported change will be reviewed during the next  
28 site visit.
- 29 4. If the report will be considered by a Review Committee and by the Commission, the report is added  
30 to the appropriate agendas. The program administrator receives notice of the results of the  
31 Commission's review.  
32

33 The following alternatives may be recommended by Review Committees and/or be taken by the  
34 Commission in relation to the review of reports of addition of educational activity sites received from  
35 accredited educational programs.

- 36 • *Approve the addition of the educational activity site:* If the Review Committees or Commission does  
37 not identify any concerns regarding the program's continued compliance with the accreditation  
38 standards, the transmittal letter should advise the institution that the change has been noted and will  
39 be reviewed at the next regularly-scheduled site visit to the program.
- 40 • *Approve the addition of the educational activity site and request additional information:* If the  
41 Review Committees or Commission does not identify any concerns regarding the program's  
42 compliance with the accreditation standards, but believes follow up reporting is required to ensure  
43 continued compliance with accreditation standards, additional information will be requested for  
44 review by the Commission. Additional information could occur through a supplemental report or a  
45 focused site visit. Use of the educational site is permitted.

- 1 • *Postpone action and continue the program's accreditation status, but request additional information:*  
2 The transmittal letter will inform the institution that the report of the addition of the educational  
3 activity site has been considered, but that concerns regarding continued compliance with the  
4 accreditation standards have been identified. Additional specific information regarding the identified  
5 concerns will be requested for review by the Commission. The institution will be further advised  
6 that, if the additional information submitted does not satisfy the Commission regarding the identified  
7 concerns, the Commission reserves the right to request additional documentation, conduct a special  
8 focused site visit of the program, or deny the request. Use of the educational activity site is not  
9 permitted until Commission approval is granted.
- 10 • *Deny the request:* If the submitted information does not indicate that the program will continue to  
11 comply with the accreditation standards, the Commission will deny the request for the addition of  
12 educational activity sites. The institutions will be advised that they may re-submit the request with  
13 additional information if they choose.

14 Revised: 2/24; 2/22; 8/18; 8/17; Reaffirmed: 8/20; Adopted: 2/16 (Former Off-Campus Policy)

15



**COMMITTEE MEMBERSHIP ROSTER, 2025**  
**Dental Public Health, Dental Anesthesiology, Oral Medicine, Orofacial Pain**

| <b>REVIEW COMMITTEE ON DENTALPUBLIC HEALTH EDUCATION</b> |                           |                                  |                                   |
|--|---------------------------|----------------------------------|-----------------------------------|
| <b>DATES OF MEETINGS</b>                                 |                           |                                  |                                   |
| <b>MEMBER</b>  | <b>STRUCTURE CATEGORY</b> | <b>TERM EXPIRES-<br/>current</b> | <b>TERM EXPIRES-<br/>proposed</b> |
|  | (Commissioner AAPHD)      | 2028                             | 2028                              |
|  | General dentist           | 2028                             | 2028                              |
|  | AAPHD nominee             | 2028                             | 2029                              |
|  | ABDPH nominee             | 2025                             | 2026                              |
|  | Public                    | 2028                             | 2028                              |

| <b>REVIEW COMMITTEE ON DENTAL ANESTHESIOLOGY EDUCATION</b> |                           |                                  |                                   |
|--|---------------------------|----------------------------------|-----------------------------------|
| <b>DATES OF MEETINGS</b>                                   |                           |                                  |                                   |
| <b>MEMBER</b>  | <b>STRUCTURE CATEGORY</b> | <b>TERM EXPIRES-<br/>current</b> | <b>TERM EXPIRES-<br/>proposed</b> |
|  | (Commissioner ASDA)       | 2025                             | 2025                              |
|  | Public                    | 2025**                           | 2025**                            |
|  | ASDA nominee              | 2025                             | 2026                              |
|  | ADBA nominee              | 2025                             | 2027                              |
|  | General dentist           | 2025                             | 2025                              |

\*\* completing vacated term, not renewable

| <b>REVIEW COMMITTEE ON ORAL MEDICINE EDUCATION</b> |                           |                                   |                                   |
|--|---------------------------|-----------------------------------|-----------------------------------|
| <b>DATES OF MEETINGS</b>                           |                           |                                   |                                   |
| <b>MEMBER</b>                                      | <b>STRUCTURE CATEGORY</b> | <b>TERM EXPIRES -<br/>current</b> | <b>TERM EXPIRES-<br/>proposed</b> |
|  | (Commissioner AAOM)       | 2025                              | 2025                              |
|  | Public                    | 2025                              | 2025                              |
|  | AAOM nominee              | 2026**                            | 2027**                            |
|  | ABOM nominee              | 2025                              | 2026                              |
|  | General dentist           | 2025                              | 2025                              |

\*\* completing vacated term, not renewable

**COMMITTEE MEMBERSHIP ROSTER, 2025**  
**Dental Public Health, Dental Anesthesiology, Oral Medicine, Orofacial Pain**

| <b>REVIEW COMMITTEE ON OROFACIAL PAIN EDUCATION</b> |                           |                                  |                                   |
|---|---------------------------|----------------------------------|-----------------------------------|
| <b>DATES OF MEETINGS</b>                            |                           |                                  |                                   |
| <b>MEMBER</b>                                       | <b>STRUCTURE CATEGORY</b> | <b>TERM EXPIRES-<br/>current</b> | <b>TERM EXPIRES-<br/>proposed</b> |
|   | (Commissioner AAOP)       | 2025                             | 2025                              |
|   | Public                    | 2025                             | 2025                              |
|   | AAOP nominee              | 2026                             | 2026                              |
|   | ABOP nominee              | 2025                             | 2027                              |
|   | General dentist           | 2025                             | 2025                              |