

REPORT OF THE REVIEW COMMITTEE ON PEDIATRIC DENTISTRY EDUCATION TO THE COMMISSION ON DENTAL ACCREDITATION

Committee Chair: Dr. Joel Berg. Committee Members: Dr. James Boynton, Dr. Kevin Haubrick, Dr. Ana Keohane, Dr. Tad Mabry, and Dr. Anupama Tate. Commissioner Trainee: Dr. Jessica Lee observed the meeting as a Commissioner Trainee. Guest (Open Session Only, Virtual): Dr. Leila Younger, executive director, American Board of Pediatric Dentistry (ABPD); Dr. Marcio Guelmann, president, ABPD; Ms. Leola Royston, manager, Education Development and Academic Support, American Academy of Pediatric Dentistry (AAPD); and Dr. Sheila Brear, chief learning officer, American Dental Education Association, attended the policy portion of the meeting. Staff Member: Ms. Peggy Soeldner, manager, Advanced Dental Education; Ms. Yesenia Ruiz, manager, Advanced Dental Education, Ms. Bridget Blackwood, senior project assistant, and Ms. Michele Kendall, senior project assistant, Commission on Dental Accreditation (CODA). The meeting of the Review Committee on Pediatric Dentistry Education (PED RC) was held on July 11, 2023 via a virtual meeting.

CONSIDERATION OF MATTERS RELATED TO PEDIATRIC DENTISTRY EDUCATION

Informational Report on Frequency of Citings of Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (p. 1200): The Review Committee on Pediatric Dentistry Education (PED RC) considered the annual report on the frequency of citings of the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry implemented July 1, 2013. The report indicated that 110 site visits have been conducted from July 1, 2013 through June 30, 2021 and that the most frequently cited pediatric dentistry-specific area of non-compliance, with 20 citings, is found in Standard 4 related to advocacy. Standard 4-26, related to didactic instruction was cited a total of 9 times. Each area of compliance in Standard 4-26 was cited 3 times and includes didactic instruction in: a) the fundamental domains of child advocacy; b) federally and state funded programs; and c) principles of education. Standard 4-27, related to clinical experiences in advocacy, was cited a total of 11 times. The specific citings relate to clinical experiences in: a) communicating, teaching and collaborating with groups and individuals with 3 citings; b) advocating and advising public health policy legislation and regulations with 4 citings; and c) participating at the local, state and national level in organized dentistry to represent the oral health needs of children with 4 citings. The PED RC noted this will serve as the final report on the frequency of citings for the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry implemented on January 1, 2013. Revised Accreditation Standards were adopted August 7, 2020 with implementation July 1, 2021.

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

Informational Report on Frequency of Citings of Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (p. 1201): The Review Committee on Pediatric Dentistry (PED RC) considered the report on the frequency of citings of the

Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry implemented July 1, 2021. Since the implementation date, 22 site visits have been conducted by visiting committees of the Commission from July 1, 2021 through October 31, 2022. The report indicates a total of 7 citations of non-compliance have been made, and the most frequently cited pediatric dentistry-specific area of non-compliance, with 2 citations, is Standard 4-6b2a, completing a minimum of 50 patient encounters in which sedative agents other than nitrous oxide (but may include nitrous oxide in combination with other agents) are used, of which each student/resident acting as sole primary operator in a minimum of 25 sedation cases. The Commission will continue to receive reports annually summarizing the updated data on the frequency of citations of individual Standards.

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

Consideration of Proposed Revisions to Anesthesia Standards of the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (p. 1202): At its August 2021 meeting, the Commission on Dental Accreditation directed the establishment of a multidisciplinary Ad Hoc Committee composed of current and former Pediatric Dentistry Review Committee members as well as representation from the Dental Anesthesiology Review Committee and the Oral and Maxillofacial Surgery Review Committee to study the use of sedation in patient management, including the potential need for revision of the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry, as applicable, with a report to the Commission in Winter 2022.

The Ad Hoc Committee on Pediatric Dentistry Anesthesia Standards held two (2) meetings in November 2021 and determined that a definition of “Sole Primary Operator” should be added to the Definition of Terms within the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry. Additionally, the Ad Hoc Committee determined that an intent statement should be added to Pediatric Dentistry Standard 4-7 to clarify that “Each patient encounter shall have only one (1) sole primary operator.” At its Winter 2022 meeting, the PED RC recommended adoption of these revisions with immediate implementation, and the Commission concurred.

The Ad Hoc Committee also believed that additional meetings were required to discuss outstanding issues related to its charge, with the inclusion of an additional member to provide further perspectives on the American Academy of Pediatric Dentistry anesthesia guidelines. As such, at its Winter 2022 meeting, the PED RC also recommended, and the Commission concurred, that the Commission invite the American Academy of Pediatric Dentistry’s Chair of the Council on Clinical Affairs, Committee on Sedation and Anesthesia to join the Ad Hoc Committee as an additional member to provide a perspective on the potential revision to the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry related to anesthesia education for pediatric dentistry. The Commission further directed the Ad Hoc Committee on Pediatric Dentistry Anesthesia Standards to continue its review of pediatric dentistry Accreditation Standards which may warrant revision, with a report to the Commission in Summer 2022.

The Ad Hoc Committee held two (2) additional meetings in May and June 2022. As the discussion continued, the Ad Hoc Committee reviewed components of Pediatric Dentistry Standard 4-7a and b, suggesting the revisions. The proposed revisions differentiate “minimal” and “moderate” sedation. The Committee also determined that the age of pediatric dentistry patients should be clarified to “patients 13 or under.” Further, of the sedation cases not performed as the sole primary operator, beyond those 15 encounters that must involve direct patient care, the remaining may include simulation experiences. The Ad Hoc Committee thoroughly considered the use of simulation in health care education. The Committee noted educational “simulation” methods ranging from written case studies that only address knowledge through simulation methods using high-fidelity mannequins that simulate a real patient experience and assess knowledge and hands-on skill. It was noted that, if used appropriately, simulation that models that real patient experience may provide a valid educational tool. The Ad Hoc Committee believed that case-based written and/or discussion simulation activities are not appropriate methods through which knowledge and skill can be fully assessed.

The Ad Hoc Committee further noted that in September 2011, the Association of American Medical Colleges (AAMC) published the “Medical Simulation in Medical Education: Results of an AAMC Survey” in which the AAMC, for the purpose of the survey, defined “simulation.” Following discussion, the Ad Hoc Committee believed that the AAMC’s definition should be added to the Definition of Terms in reference to simulation activities that are permitted within the Accreditation Standards for pediatric dentistry programs.

The Ad Hoc Committee also concluded and recommended that, with future enhancements in technology and changes in educational models, the Commission further study simulation and its implications to dental and dental-related education programs as it relates to all disciplines within the Commission’s purview, through formation of an Ad Hoc Committee representing all disciplines, with a future report to the Commission.

At its Summer 2022 meeting, the PED RC carefully considered the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry submitted by the Ad Hoc Committee. Following discussion, the PED RC supported the proposed revisions to the standards submitted by the Ad Hoc Committee and recommended that the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (**Appendix 1, Policy Report p. 1202**) be circulated to the communities of interest for review and comment, with Hearings held in conjunction with the October 2022 American Dental Association and March 2023 American Dental Education Association meetings, with comments reviewed at the Commission’s Summer 2023 meetings. The PED RC further believed that the Commission should study simulation and its implications to dental and dental-related education programs as it relates to all disciplines within the Commission’s purview, through formation of an Ad Hoc Committee representing all disciplines, with a future report to the Commission.

As directed by the Commission, the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (**Appendix 1, Policy Report p. 1202**) were circulated for comment through June 1, 2023. No (0) comments were received at the virtual hearing in conjunction with the ADA meeting and no (0) comments were received at the virtual hearing in conjunction with the ADEA meeting. The Commission office received 20 written comments prior to the June 1, 2023 deadline.

Summer 2023 Review Committee Meeting: At this meeting, the Pediatric Dentistry Review Committee considered the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry (**Appendix 1, Policy Report p. 1202**) and the comments received prior to the June 1, 2023 deadline (**Appendix 2, Policy Report p. 1202**).

Through review of the written comments received, the PED RC noted several from the state of California related to the state's requirement for minimal and moderate sedation permits. The comments indicated that because of the administrative and financial costs of obtaining the sedation permits, the proposed revisions requiring minimal and moderate sedation experience could place an undue burden on clinical faculty who supervise residents, especially at affiliated clinical sites.

Other comments addressed the proposed revisions related to required patient encounters in which sedative agents are used and their relation to the current ADA Guidelines for Teaching Pediatric Pain Control and Sedation to Dentists and Dental Students, particularly as they relate to providing sedation to patients eight (8) years of age or younger. The comments indicated that the requirements in the Standards are less stringent than the ADA Guidelines and that the Accreditation Standards should at least meet or exceed the ADA Guidelines to ensure pediatric dentistry program graduates have more advanced training requirements than that of dental students or general dentists.

Following lengthy discussion, the PED RC believed the proposed revisions require further consideration and should not be approved at this time. Therefore, the PED RC recommended that a workgroup of the members of the Review Committee, including the current and incoming Review Committee chair, further consider the proposed revisions with a report to the Winter 2024 meetings of the PED RC and Commission.

Additionally, because the continued study of the Standards includes ensuring the requirements align with the ADA Guidelines, the PED RC believed it would be beneficial to consult, as needed, with one (1) of the pediatric dentists who was involved in the development of the current ADA Guidelines for Teaching Pediatric Pain Control and Sedation to Dentists and Dental Students. The PED RC recommended that Commission direct this consultation, as needed.

Recommendation: It is recommended that the Commission on Dental Accreditation direct continued review of the proposed revisions to the pediatric dentistry Accreditation Standards related to the use of sedation in patient management, through appoint of a workgroup composed of members of the Review Committee, including the current and

incoming chair, with a report to the Winter 2024 meeting of the Pediatric Dentistry Review Committee and Commission.

It is further recommended that the Commission on Dental Accreditation direct that the pediatric dentistry workgroup to study the use of sedation in patient management within the Pediatric Dentistry Standards include, as needed, consultation with a pediatric dentist who was involved in the development of the current ADA Guidelines for Teaching Pediatric Pain Control and Sedation to Dentists and Dental Students.

Consideration of Proposed Revision to Accreditation Standards for Advanced Dental Education Programs Related to Sponsoring Organization and Authority to Operate (p.

1203): At its Winter 2022 meeting, the Commission on Dental Accreditation (CODA) directed the formation of an Ad Hoc Committee to consider the changing landscape of health care delivery centers that may sponsor advanced dental education programs.

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) the standard found in some advanced dental education disciplines that requires the sponsor have proper chartering/licensure to operate and offer instruction leading to a degree, diploma or certificate with recognized education validity.

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 dental 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.

Following consideration of the Ad Hoc Committee's recommendation, the Commission directed 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 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 the Ad Hoc Committee and the Commission.

Through discussion, the Ad Hoc Committee noted that words such as "chartered," "licensed," and "validity" have very distinct legal meanings. The term "authorization" is often used in higher education to indicate that an institution can confer a degree. Chartering and licensing

often have to do with legal entities and do not necessarily indicate authority to award a degree, diploma or certificate with recognized education validity. The Ad Hoc Committee also noted the confusion related to this requirement from both the institution's/program's perspective and that of the CODA site visitor.

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

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

Following discussions at two (2) meetings, the Ad Hoc Committee recommended circulation of the proposed Definition of Terms for Health Care Organization and proposed revision to Standards related to institutional sponsors to include health care organizations and the proposed revision related to chartering and licensure (**Appendix 1, Policy Report p. 1203**) be circulated to all Review Committees in Advanced Dental Education for consideration at the Summer 2023 Commission meetings, with a report to the Commission in Summer 2023. The Committee also noted that a Review Committee's recommendation to revise the Standards would require a period of public comment and further consideration at a future Commission meeting, following the Commission's consideration in Summer 2023.

At its Winter 2023 meeting, the Commission concurred with the Ad Hoc Committee's recommendations and directed all advanced dental education Review Committees to consider the proposed revisions to advanced dental education Standards found in (**Appendix 1, Policy Report p. 1203**), related to sponsoring organization and authority to operate, for possible adoption and implementation, with a report to the Commission in Summer 2023.

Summer 2023 Review Committee Meeting: Summer 2023 Review Committee Meeting: At this meeting, the PED RC considered the proposed revisions, as directed by the Commission. The PED RC also briefly discussed the background that led to the formation of the Ad Hoc Committee

to study the changing landscape of health care delivery centers that may sponsor advanced dental education programs. The PED RC noted the proposed revisions include a proposed Definition of Terms for Health Care Organization, as well as proposed revision to Standards related to institutional sponsors to include health care organizations and a new requirement related to authority to operate, confer a certificate and, as applicable, confer a degree.

The PED RC agreed that the proposed revisions provide further clarification of the types of institutions that may sponsor advanced dental education programs and the requirements related to the authority to operate. Further, the PED RC believed that the inclusion of the proposed definition and revisions in the Pediatric Dentistry Accreditation Standards could have a positive impact on the discipline by expanding the types of institutions that are eligible to sponsor pediatric dentistry programs. Therefore, the PED RC recommended the circulation of the proposed revisions to the communities of interest to provide the opportunity for review and comment.

Recommendation: It is recommended that the Commission on Dental Accreditation 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.

CONSIDERATION OF MATTERS RELATING TO MORE THAN ONE REVIEW COMMITTEE

Matters related to more than one review committee are included in a separate report.

CONSIDERATION OF SITE VISITOR APPOINTMENTS TO THE COMMISSION ON DENTAL ACCREDITATION IN THE AREA OF PEDIATRIC DENTISTRY EDUCATION

Due to an ongoing need for additional site visitors, the Review Committee on Pediatric Dentistry Education (PED RC) considered site visitor nominations at this meeting. The Committee's recommendations on the nominations are included in a separate report.

CONSIDERATION OF MATTERS RELATED TO ACCREDITATION STATUS

Matters related to accreditation status of programs are included in a separate report.

Respectfully submitted,

Dr. Joel Berg
Chair, Review Committee on Pediatric Dentistry Education

Commission on Dental Accreditation

Proposed Revisions to Definition of Terms and Standard 1

Additions are Underlined
~~Strikethroughs~~ indicate Deletions

Accreditation Standards for Advanced Dental Education Programs in Pediatric Dentistry

1
2 **PROPOSED REVISIONS TO ACCREDITATION STANDARDS FOR ADVANCED**
3 **DENTAL EDUCATION PROGRAMS RELATED TO SPONSORING INSTITUTION**
4 **AND AUTHORITY TO OPERATE**
5
6

7 Additions are underlined; Deletions are ~~stricken~~
8

9 **PROPOSED REVISIONS FOR ALL ADVANCED DENTAL EDUCATION**
10 **STANDARDS:**
11

12 **Definition of Terms:**
13

14 **Health Care Organization:** A Federally Qualified Health Center (FQHC), Indian Health
15 Service (IHS), Veterans Health Administration system (VA), or academic health center/medical
16 center/ambulatory care center (both public and private) that is accredited by an agency
17 recognized by the United States Department of Education or accredited by an accreditation
18 organization recognized by the Centers for Medicare and Medicaid Services (CMS).
19

1
2 **PROPOSED REVISIONS FOR STANDARD 1 FOR DENTAL PUBLIC HEALTH,**
3 **ENDODONTICS, ORAL AND MAXILLOFACIAL PATHOLOGY, ORAL AND**
4 **MAXILLOFACIAL RADIOLOGY, ORTHODONTICS AND DENTOFACIAL**
5 **ORTHOPEDECS, ORAL AND MAXILLOFACIAL SURGERY, PEDIATRIC**
6 **DENTISTRY, PERIODONTICS, AND PROSTHODONTICS:**
7

8 **Standard 1-Institutional Commitment/Program Effectiveness**
9

10 ~~Advanced dental education programs must be sponsored by institutions, which are properly~~
11 ~~chartered, and licensed to operate and offer instruction leading to degrees, diplomas or~~
12 ~~certificates with recognized education validity.~~ Hospitals that sponsor advanced dental
13 education programs **must** be accredited by an accreditation organization recognized by the
14 Centers for Medicare and Medicaid Services (CMS). Educational institutions that sponsor
15 advanced dental education programs **must** be accredited by an agency recognized by the United
16 States Department of Education. Health care organizations that sponsor advanced dental
17 education programs must be accredited by an agency recognized by the United States
18 Department of Education or accredited by an accreditation organization recognized by the
19 Centers for Medicare and Medicaid Services (CMS). The bylaws, rules and regulations of
20 hospitals or health care organizations that sponsor or provide a substantial portion of advanced
21 dental education programs **must** assure that dentists are eligible for medical staff membership
22 and privileges including the right to vote, hold office, serve on medical staff committees and
23 admit, manage and discharge patients.
24

25 United States military programs not sponsored or co-sponsored by military medical treatment
26 facilities, United States-based educational institutions, hospitals or health care organizations
27 accredited by an agency recognized by the United States Department of Education or accredited
28 by an accreditation organization recognized by the Centers for Medicare and Medicaid Services
29 (CMS) **must** demonstrate successful achievement of Service-specific organizational inspection
30 criteria.
31

32 **Examples of evidence to demonstrate compliance may include:**

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

45
46 Advanced dental education programs conferring a certificate must have state or federal approval

1 to operate and, as applicable, to confer a certificate. Advanced dental education programs
2 conferring a degree **must** have institutional accreditation and authority to confer a degree.

3

4 **Examples of evidence to demonstrate compliance may include:**

5 • State license or federal authority documenting the institution's approval to operate and
6 confer a credential

7 • Institutional accreditation indicating approval to confer a degree