

REPORT OF THE STANDING COMMITTEE ON QUALITY ASSURANCE AND STRATEGIC PLANNING

Background: The Standing Committee on Quality Assurance and Strategic Planning (QASP) charge is to:

- Develop and implement an ongoing strategic planning process;
- Develop and implement a formal program of outcomes assessment tied to strategic planning;
- Use results of the assessment processes to evaluate the effectiveness of the Commission and make recommendations for appropriate changes, including the appropriateness of its structure;
- Monitor USDE, and other quality assurance organizations e.g. Council on Higher Education Accreditation (CHEA), American National Standards Institute/International Organization for Standardization (ANSI/ISO), and International Network for Quality Assurance Agencies in Higher Education (INQAAHE) for trends and changes in parameters of quality assurance; and
- Monitor and make recommendations to the Commission regarding changes that may affect its operations, including expansion of scope and international issues.

July 24, 2024 Meeting of the QASP: The QASP conducted a virtual meeting on July 24, 2024. **Members of the Standing Committee:** Dr. Maxine Feinberg (chair), Dr. Joseph Giovannitti, Dr. Frank Licari, Dr. Garry Myers, Dr. Monica Nenad, and Dr. Nancy Rosenthal were in attendance. Ms. Margaret Bowman-Pensel and Dr. Carolyn Brown were unable to attend the meeting. **Commissioners:** Dr. Maxine Feinberg, chair, and Frank Licari, vice chair, members of the Committee, Commission on Dental Accreditation (CODA) attended the meeting. **Commission Staff:** Dr. Sherin Tooks, senior director, CODA, and Ms. Jamie Asher Hernandez, Ms. Kathleen Navickas, Dr. Yesenia Ruiz, Ms. Peggy Soeldner, and Ms. Kelly Stapleton, managers, CODA, and Ms. Samara Schwartz, senior associate general counsel, ADA/CODA, were also in attendance.

The QASP initiated its meeting with a review of the charge to the Standing Committee. Discussion was focused on the American Dental Association (ADA)-CODA Shared Services Agreement, ongoing quality assurance and strategic planning activities, and additional items of interest to CODA related to strategic planning and operational effectiveness. Below is a summary of QASP discussions and recommendations.

Consideration of Ongoing Quality Assurance and Strategic Planning Activities

Review of the Shared Services Agreement Between the Commission on Dental Accreditation (CODA) and the American Dental Association (ADA): The Standing Committee on Quality Assurance and Strategic Planning (QASP) discussed CODA's Shared Services Agreement with the ADA, which was signed in September 2022 for the period of January 1, 2022 through January 1, 2025. The Committee noted that the Agreement will expire at the end of the 2024 calendar year, December 31, 2024. The Standing Committee was informed of the 2024 ADA-CODA Relationship Workgroup meeting, during which the Workgroup discussed upcoming changes and ongoing projects that may affect the Shared Services Agreement, such as the relocation of ADA offices; required meeting space for CODA trainings, Review Committee and

Commission meetings; and CODA's ongoing technology needs, including development and long-term maintenance of electronic accreditation systems. The QASP believed that additional information is needed by the Commission related to these changes and ongoing projects in regard to the impact on Shared Services. See the Report of the Standing Committee on Finance (**Finance Report, p. 1900, Summer 2024**).

Additional Quality Assurance and Strategic Planning Items for Discussion

Activities Related to the Commission on Dental Accreditation of Canada (CDAC): The Standing Committee on Quality Assurance and Strategic Planning (QASP) members noted the Commission's March 1, 2024 letter to CDAC related to the review of Oral Medicine Standards for potential inclusion in the reciprocal agreement between CODA and CDAC. The Standing Committee was informed that the Commission awaits further communication from CDAC on the potential review of the Oral Medicine Standards.

Trends in Dental Education, Practice, Research, and Higher Education, and Update on United States Department of Education and General Accreditation Matters: The Standing Committee on Quality Assurance and Strategic Planning (QASP) discussed several trends in higher education and accreditation. The QASP noted that the United States Department of Education (USDE) is undergoing Negotiated Rulemaking in 2024, with several topics on the agenda. The Committee also noted that the upcoming presidential election could result in changes within higher education and accreditation.

The Standing Committee also noted the Winter 2024 Commission directive that CODA staff obtain information on recent changes to Pell Grant and Title IV funding, and the impact on CODA-accredited allied dental education programs, with a report to the Commission through its Ad Hoc Committee on Dental Assisting Program Closure and Discontinuance of Accreditation, the Ad Hoc Committee on Dental Laboratory Technology Accreditation Standards, and the Standing Committee on Quality Assurance and Strategic Planning in Summer 2024. The QASP recalled the recent change in Title IV Student Financial Aid (§ 668.14 Program participation agreement), which would affect programs that prepare students for gainful employment in a recognized occupation. The Title IV change requires an institution to establish a need for training and a reasonable relationship between the length of the program and entry-level requirements for the occupation. The QASP recalled that the Title IV change, effective July 1, 2024, may have an impact on dental assisting and dental laboratory technology education programs. The Standing Committee learned that, following the Winter 2024 Commission meeting, the Commission Senior Director sought guidance from several USDE staff and circulated an informational summary to CODA-accredited allied dental education programs that may be affected by the changes in Title IV Student Financial Aid (**Appendix 1**).

Quality Assurance and Strategic Planning Committee Recommendation: This report is informational in nature and no action is required.

Commission Action:

From: [Commission on Dental Accreditation](#)
To: [REDACTED]
Subject: FAFSA Changes Potential Impact to CODA-Accredited Programs
Date: Wednesday, April 10, 2024 10:24:24 AM

FAFSA Changes & Potential Impact to CODA-Accredited Programs



CODA logo



CODA Alert

Changes in Federal Student Aid Regulations and Potential Impact to CODA-Accredited Programs

Dear Allied Dental Program Directors:

In Fall 2023 and early 2024, the Commission on Dental Accreditation (CODA) was contacted by a CODA-accredited allied dental education program related to potential concerns with upcoming changes, effective July 1, 2024, in the Department of Education Federal Student Aid (DOE-FSA) regulations related to certification procedures for institutions participating in the Title IV, HEA programs. At its Winter 2024 meeting, the Commission directed that CODA staff obtain information on these changes and the potential impact on CODA-accredited allied dental education programs.

On March 20, 2024, CODA's Senior Director spoke with the staff of the DOE-FSA and obtained the following information, which was recently approved by DOE-FSA for CODA circulation, and which we are providing below to assist all CODA-accredited allied dental education programs in understanding the changes to Title IV funding as it relates to § 34 CFR 668.14(b)(26).

You will notice the most important point below in **red**, that states: **If the state has no requirement for minimum education (degree, credits, and/or hours) to obtain certification and/or licensure in a profession, the regulation of § 668.14 does not apply to the educational program.**

Take-Away Points:

- **§ 34 CFR 668.14(b)(26)** - Regulation requires programs leading to Gainful Employment to not exceed state education requirement for profession to allow students access to federal financial aid.

Gainful Employment – any non-degree program at a public or private institution, and all programs at for-profit institutions

- State Education Requirement – the requirement for minimum education (degree, credits, and/or hours) to obtain certification and/or licensure in a profession as dictated by the appropriate state agency. This could be the state department of education or a state licensing agency, and is dictated by the highest authority or state statute for minimum program length.
 - Programs are expected to know the state minimum education requirements. The prior allowance of program length 150% beyond state requirement is no longer in place.
- Degree programs (i.e. associate or higher degrees) are exempt from the regulation, as long as the state requires this degree/education. Diploma and certificate programs are not considered degree awarding programs. DOE-FSA also notes that the applicable regulation, 34 CFR 668.26(26)(iii), provides an exception that is only a factor within the context of a Gainful Employment (GE) program to which the restrictions apply. A degree-granting program at public or nonprofit private institution is not subject to the restrictions of 668.14(b)(26) in any case.
- If the educational program is longer than state minimum requirements it will, after the regulation takes effect, cease to be an eligible program. No form of Title IV assistance may be offered to students in a program that is not eligible.
- The educational program’s eligibility is all or none; the regulation does not permit partial eligibility (e.g. up to educational hours dictated by the state).
- **If the state has no requirement for minimum education (degree, credits, and/or hours) to obtain certification and/or licensure in a profession, the regulation of § 668.14 does not apply to the educational program.**
- FSA will publish further implementation guidance soon.
 - Published April 9, 2024: [Updates on New Regulatory Provisions Related to Certification Procedures and Ability-to-Benefit | Knowledge Center](#)

CODA also provided the DOE-FSA the following example/scenario to clarify the application of the new regulation in states where additional training for specific job requirements may exist, although there is no required education for practice in the profession.

CODA Question - In some states, entry into the profession requires no education and there is no licensure and/or certification. However, an individual may take additional training for a specific function in the profession within that state (e.g. expanded functions certification, radiology certification, etc.). Are we correct to assume that the regulation is applied to the entry point for the profession, which in the example would mean no education required, although other certifications may be granted for that profession with additional training?

DOE-FSA Answer - Any certification program not leading to a degree (assuming here that that is what is being referenced) is necessarily a GE program, i.e., preparing students for gainful employment in a recognized occupation, and potentially subject to the rule. In the case of the functions certifications noted, e.g. radiology, whether or not a program length limitation applies would depend upon whether the state has established a minimum number of clock hours, credit hours, or the equivalent required for training in the recognized occupation for which the program prepares the student. A separate dental radiology program that admits only licensed dental assistants is not exempt because students already completed another program that secured entry into the dental assisting profession.

The Commission on Dental Accreditation strongly suggests that you seek additional clarification through the DOE-FSA and your institutional leadership related to the impact of this regulation on your allied dental education program.

DOE-FSA Regulation: § 668.14 Program participation agreement.

(26) If an educational program offered by the institution on or after July 1, 2024, is required to prepare a student for gainful employment in a recognized occupation, the institution must—

(i) Establish the need for the training for the student to obtain employment in the recognized occupation for which the program prepares the student; and

(ii) Demonstrate a reasonable relationship between the length of the program and the entry level requirements for the recognized occupation for which the program prepares the student by limiting the number of hours in the program to the greater of—

(A) The required minimum number of clock hours, credit hours, or the equivalent required for training in the recognized occupation for which the program prepares the student, as established by the State in which the institution is located, if the State has established such a requirement or as established by any Federal agency; or

(B) Another State's required minimum number of clock hours, credit hours, or the equivalent required for training in the recognized occupation for which the program prepares the student, if the institution documents, with substantiation by a certified public accountant who prepares the institution's compliance audit report as required under § 668.23 that—

- 1. A majority of students resided in that State while enrolled in the program during the most recently completed award year;*
- 2. A majority of students who completed the program in the most recently completed award year were employed in that State; or*
- 3. The other State is part of the same metropolitan statistical area as the institution's home State and a majority of students, upon enrollment in the program during the most recently completed award year, stated in writing that they intended to work in that other State; and*

(iii) Notwithstanding paragraph (a)(26)(ii) of this section, the program length limitation does not apply for occupations where the State entry level requirements include the completion of an associate or higher-level degree; or where the program is delivered entirely through distance education or correspondence courses;

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