REPORT OF THE REVIEW COMMITTEE ON ORAL AND MAXILLOFACIAL RADIOLoGY EDUCATION TO THE COMMISSION ON DENTAL ACCREDITATION

Committee Chair: Dr. Sanjay Mallya. Committee Members: Dr. Boris Bacanurschi, Dr. King Chong Chan, Dr. Karen Parker-Davidson, and Dr. Sindhura Anamali Reddy. Guests (Open Session Only, Virtual): Dr. Sheila Brear, chief learning officer, American Dental Education Association, attended the policy portion of the meeting. Staff Members: 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 Oral and Maxillofacial Radiology Education (OMR RC) was held on July 10, 2023 via a virtual meeting.

CONSIDERATION OF MATTERS RELATED TO ORAL AND MAXILLOFACIAL RADIOLoGY EDUCATION

Informational Report on Frequency of Citings of Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology (p. 900): The Review Committee on Oral and Maxillofacial Radiology Education (OMR RC) considered the annual report on the frequency of citings of the Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology implemented August 2, 2019 and noted that one (1) oral and maxillofacial radiology site visit was conducted from August 2, 2019 through October 31, 2022. To ensure confidentiality, Frequency of Citings reports will not be made available where a limited number (three or less) of programs have been site visited. Once there are four (4) or more site visits of oral and maxillofacial radiology programs, the non-compliance citings will be analyzed and summarized accordingly.

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

Consideration of Proposed Revisions to the Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology (p. 901): At its Summer 2022 meeting, the Review Committee on Oral and Maxillofacial Radiology Education (OMR RC) considered a proposed revision to the Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology submitted by the American Association of Oral and Maxillofacial Radiologists (AAOMR) related to assurance that graduates are familiar with intended applications and limitations of artificial and augmented intelligence-based approaches in dentomaxillofacial imaging. The OMR RC discussed artificial and augmented intelligence (AI), noting that it is a growing field with applications in dentistry and oral and maxillofacial radiology. Further, the committee considered the potential uses of AI including clinical data-driven decision making, identification of radiologic anatomy and disease manifestations, as well as image enhancement to reduce artifacts and noise. In addition, the OMR RC noted that as the use of AI-based systems increases, oral and maxillofacial radiologists will need to be familiar with the basic principles of artificial intelligence (AI)/machine learning (ML), the accuracy and performance of AI-based systems and models, the common training errors and evaluation
methods for these systems, and the liabilities associated with detection and identification of dentomaxillofacial pathoses.

The OMR RC concluded that the addition of this concept within the Accreditation Standards is appropriate and determined that graduates of oral and maxillofacial radiology programs must have an understanding of the intended applications and limitations of artificial and augmented intelligence-based approaches in dentomaxillofacial imaging. In doing so, the Committee believed that programs would receive additional clarity from an intent statement indicating that graduates “will be prepared to serve as a resource to the referring clinician with respect to guiding and discussing optimal application of artificial and augmented intelligence-based approaches in radiology practice.” The OMR RC noted that the addition of a new Standard 4-16 would necessitate renumbering of the subsequent standard.

The OMR RC recommended the proposed addition of a new Standard 4-16 to the Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology (Appendix 1, Policy Report p. 901) be circulated to the communities of interest for review and comment for a period of one (1) year, with Hearings conducted 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.

As directed by the Commission, the proposed new Standard 4-16 within the Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology was 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 one (1) written comment prior to the June 1, 2023 deadline (Appendix 2, Policy Report p. 901).

**Summer 2023 Review Committee Meeting:** At this meeting, the Oral and Maxillofacial Radiology Review Committee considered the proposed new Standard 4-16 within the Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology and the written comment received prior to the June 1, 2023 deadline, noting the written comment was supportive of the addition of the proposed Standard 4-16. Upon conclusion of the discussion, the OMR RC determined the new Standard 4-16 should be approved as circulated and recommended an implementation date of July 1, 2024.

**Recommendation:** It is recommended that the Commission on Dental Accreditation adopt the proposed new Standard 4-16 within the Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology (Appendix 1) and related documents for implementation July 1, 2024.

**Consideration of Proposed Revision to Accreditation Standards for Advanced Dental Education Programs Related to Sponsoring Organization and Authority to Operate (p. 902):** 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. 902) 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. 902), 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:** At this meeting, the OMR RC discussed the proposed revisions as directed by the Commission and noted they 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 OMR RC agreed that the proposed revisions provide further clarification of the types of institutions that may sponsor advanced dental education programs and requirements related to the authority to operate. Further, the OMR RC believed that the inclusion of the proposed definition and revisions in the Oral and Maxillofacial Radiology Accreditation Standards should have little to no impact on oral and maxillofacial radiology education programs. The OMR RC also believed circulation of the proposed revisions to the communities of interest to provide the opportunity for review and comment is warranted.

**Recommendation:** It is recommended that the Commission on Dental Accreditation direct circulation of the proposed revisions found in Appendix 2, 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 ORAL AND MAXILLOFACIAL RADIOLOGY EDUCATION

No site visitor nominations were considered at this meeting.

CONSIDERATION OF MATTERS RELATED TO ACCREDITATION STATUS

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

Respectfully submitted,

Dr. Sanjay Mallya
Chair, Review Committee on Oral and Maxillofacial Radiology Education
Commission on Dental Accreditation

At its Summer 2022 meeting, the Commission directed that the proposed revisions to Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology be distributed to the appropriate communities of interest for review and comment, with comment due June 1, 2023, for review at the Summer 2023 Commission meeting.

This document represents the proposed revisions based upon review of comment received from communities of interest from August 5, 2022 to June 1, 2023.

This document will be considered by the Commission in Summer 2023.

Additions are Underlined; Strikethroughs indicate Deletions

Accreditation Standards for Advanced Dental Education Programs in Oral and Maxillofacial Radiology
STANDARD 4 – CURRICULUM AND PROGRAM DURATION

The advanced dental education program must be designed to provide special knowledge and skills beyond the D.D.S. or D.M.D. training and be oriented to the accepted standards of the discipline’s practice as set forth in specific standards contained in this document.

Intent: The intent is to ensure that the didactic rigor and extent of clinical experience exceeds pre-doctoral, entry level dental training or continuing education requirements and the material and experience satisfies standards for the discipline.

Advanced dental education programs must include instruction or learning experiences in evidence-based practice. Evidence-based dentistry is an approach to oral health care that requires the judicious integration of systematic assessments of clinically relevant scientific evidence, relating to the patient’s oral and medical condition and history, with the dentist’s clinical expertise and the patient’s treatment needs and preferences.

Examples of Evidence to demonstrate compliance may include:
- Formal instruction (a module/lecture materials or course syllabi) in evidence-based practice
- Didactic Program course syllabi, course content outlines, or lecture materials that integrate aspects of evidence-based practice
- Literature review seminar(s)
- Multidisciplinary Grand Rounds to illustrate evidence-based practice
- Projects/portfolios that include critical reviews of the literature using evidence-based practice principles (or “searching publication databases and appraisal of the evidence”)
  - Assignments that include publication database searches and literature appraisal for best evidence to answer patient-focused clinical questions.

The level of discipline-specific instruction in certificate and degree-granting programs must be comparable.

Intent: The intent is to ensure that the students/residents of these programs receive the same educational requirements as set forth in these Standards.

Documentation of all program activities must be ensured by the program director and available for review.

If an institution and/or program enrolls part-time students/residents, the institution/program must have guidelines regarding enrollment of part-time students/residents. Part-time students/residents must start and complete the program within a single institution, except when the program is discontinued. The director of an accredited program who enrolls students/residents on a part-time basis must ensure that: (1) the educational experiences, including the clinical experiences and
responsibilities, are the same as required by full-time students/residents; and (2) there are an equivalent number of months spent in the program.

PROGRAM DURATION

4-1 The duration of an advanced oral and maxillofacial radiology program must be a minimum of 24 months full-time or its equivalent.

4-2 Students/residents must be enrolled on, at least, a half-time basis.

ETHICS AND PROFESSIONALISM

4-3 Graduates must be able to apply the principles of ethical reasoning, ethical decision making and professional responsibility as they pertain to the academic environment, research, patient care, and practice management.

Intent: Graduates should know how to draw on a range of resources such as professional codes, regulatory law, and ethical theories to guide judgment and action for issues that are complex, novel, ethically arguable, divisive, or of public concern.

CLINICAL ORAL AND MAXILLOFACIAL RADIOLOGY

4-4 Students/Residents must assume major responsibility for interpretations and consultative reports on an adequate number of imaging studies of sufficient variety to be competent, as graduates, in clinical oral and maxillofacial radiology.

4-5 Clinical oral and maxillofacial radiology case conferences must be held an average of, at least, once every two weeks.

Intent: The intent is to ensure that graduates understand and can explain the underlying principles of interpretation of disease processes.

4-6 Students/residents must participate in regularly scheduled literature reviews.

Intent: Graduates will have an in-depth knowledge of the current literature in oral and maxillofacial radiology.

ORAL AND MAXILLOFACIAL DIAGNOSTIC IMAGING TECHNIQUES

4-7 Training in oral and maxillofacial diagnostic imaging techniques must be provided to the students/residents with adequate instruction and supervision.
4-8 Graduates must be competent in the procedures performed in oral and maxillofacial radiology including, but not limited to: (a) intraoral, (b) panoramic, (c) cephalometric and other skull projections, and (d) cone-beam computed tomography/volumetric imaging.

4-9 Graduates must have an in-depth knowledge of other imaging techniques applicable to oral and maxillofacial radiology, including, but not limited to: (a) multi-slice/detector computed tomography, (b) magnetic resonance imaging, (c) diagnostic ultrasonography, and (d) nuclear medicine imaging techniques.

**Intent:** Programs will provide students/residents with an in-depth knowledge of the technical procedures to acquire these studies but not necessarily experience in independent acquisition of these studies.

4-10 Graduates must understand administrative procedures associated with the directorship of an oral and maxillofacial radiology facility.

**Intent:** Graduates of oral and maxillofacial radiology programs will be prepared to assume the administrative responsibilities to direct a radiology facility.

### ASSOCIATED MEDICAL SCIENCES

4-11 The program must provide advanced education in head and neck anatomy, and oral and maxillofacial pathology.

### EVALUATION AND RADIOLOGIC MANAGEMENT OF PATIENTS

4-12 The program must provide students/residents with an understanding of and experience in the clinical manifestations of head and neck diseases and head and neck manifestations of systemic diseases as an important facet of the training and practice of oral and maxillofacial radiology.

4-13 Students/Residents must attend head and neck tumor board or a similar institutional interdisciplinary conference which includes radiology on a regular basis, but at least monthly.

4-14 Graduates must be competent in designing appropriate radiologic studies.

**Intent:** Graduates of oral and maxillofacial radiology programs will be prepared to serve as a resource to the referring clinician with respect to selecting the optimum examination.

4-15 The clinical training of oral and maxillofacial radiology students/residents in the routine activities of a screening/emergency or treatment planning clinics must be minimized.
4-16 Graduates must understand intended applications and limitations of artificial and augmented intelligence-based approaches in dentomaxillofacial imaging.

**Intent:** Graduates of oral and maxillofacial radiology programs will be prepared to serve as a resource to the referring clinician with respect to guiding and discussing optimal application of artificial and augmented intelligence-based approaches in radiology practice.

**MEDICAL RADIOLOGY**

4-1617 The program must provide for a meaningful period of education in medical radiology in an active, hospital-based radiology department or other similar facility of, at least, three months duration, or its part-time equivalent.

**Intent:** The practice of oral and maxillofacial radiology calls for the association, cooperation and frequent consultation with medical radiologists (general, head and neck, and/or neuroradiology). An understanding of the broad scope of radiology is important.

**RADIATION AND IMAGING PHYSICS**

4-1718 Graduates must understand radiation physics including the basic imaging physics of: (a) analog and digital oral and maxillofacial radiography; (b) cone-beam computed tomography/volumetric imaging; (c) multi-slice computed tomography; (d) magnetic resonance imaging; (e) diagnostic ultrasonography; (f) nuclear medicine; and (g) image enhancement analysis concepts associated with diagnostic imaging.

**RADIATION BIOLOGY**

4-1819 Graduates must have an in-depth knowledge of the biological effects of ionizing radiations.

**Intent:** Graduates will be able to describe both the biological changes and the clinical consequences of exposure to ionizing radiations

**RADIATION PROTECTION**

4-1920 Graduates must have an in-depth knowledge of radiation protection and/or hygiene.

**Intent:** Graduates will be prepared to eliminate unnecessary exposure of patients, operators and the general public

**TEACHING EXPERIENCE**

4-2021 A program in oral and maxillofacial radiology must include an organized teaching experience for students/residents with formal evaluation.

Oral and Maxillofacial Radiology Standards
The amount of time devoted by the student/resident to teaching experience must be carefully evaluated and not exceed ten percent (10%) of the overall program.
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 Oral and Maxillofacial Radiology
PROPOSED REVISIONS TO ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION PROGRAMS RELATED TO SPONSORING INSTITUTION AND AUTHORITY TO OPERATE

Additions are underlined; Deletions are stricken

PROPOSED REVISIONS FOR ALL ADVANCED DENTAL EDUCATION STANDARDS:

Definition of Terms:

Health Care Organization: A Federally Qualified Health Center (FQHC), Indian Health Service (IHS), Veterans Health Administration system (VA), or academic health center/medical center/ambulatory care center (both public and private) that is accredited by an agency recognized by the United States Department of Education or accredited by an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS).
PROPOSED REVISIONS FOR STANDARD 1 FOR DENTAL PUBLIC HEALTH, ENDODONTICS, ORAL AND MAXILLOFACIAL PATHOLOGY, ORAL AND MAXILLOFACIAL RADIOLOGY, ORTHODONTICS AND DENTOFACIAL ORTHOPEDICS, ORAL AND MAXILLOFACIAL SURGERY, PEDIATRIC DENTISTRY, PERIODONTICS, AND PROSTHODONTICS:

Standard 1-Institutional Commitment/Program Effectiveness

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

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

Examples of evidence to demonstrate compliance may include:

- Accreditation certificate or current official listing of accredited institutions from a United States Department of Education recognized accreditation organization
- Evidence of successful achievement of Service-specific organizational inspection criteria
- Accreditation certificate or current official listing of accredited institution from an accreditation organization recognized by the Centers for Medicare and Medicaid Services (CMS). For example: Accreditation Association for Ambulatory Health Care (AAAHC); Accreditation Commission for Health Care, Inc. (ACHC); American Association for Accreditation of Ambulatory Surgery Facilities (AAAASF); American Osteopathic Association Healthcare Facilities Accreditation Program (AOA/HFAP); Center for Improvement in Healthcare Quality (CIHQ); Community Health Accreditation Program (CHAP); DNV GL-Healthcare (DNV GL); National Dialysis Accreditation Commission


Advanced dental education programs conferring a certificate **must** have state or federal approval to operate and, as applicable, to confer a certificate. Advanced dental education programs conferring a degree **must** have institutional accreditation and authority to confer a degree.

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

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