

## REPORT OF THE AD HOC COMMITTEE ON ALTERNATIVE SITE VISIT METHODS

**Background:** At its August 2020 meeting, the Commission on Dental Accreditation (CODA) considered ongoing operations in response to the COVID-19 pandemic and the impact on site visits. The Commission directed that it pursue alternative site visit methods, as needed to employ in 2021. The Commission further directed investigation and development of policies and procedures for alternative site visit methods, with a report to CODA in Winter 2021. The Commission believed that input from its 14 Review Committees on the elements of a site visit that may be conducted virtually versus the elements that must be reviewed on-site was warranted and, as such, directed that the 14 Review Committees be consulted related to this matter. Finally, the Commission directed the appointment of an Ad Hoc Committee to study virtual site visits, including development of policies and procedures for the conduct of virtual visits, for consideration by the Commission in Winter 2021.

At its Winter 2021 meeting, the Commission considered the Report of the Ad Hoc Committee on Alternative Site Visit Methods. Following extensive discussion, the Commission adopted the Policy on Temporary Use of Alternative Site Visit Methods, manuals for site visitors and educational programs on the Commission's alternative site visit methods, and an Alternative Site Visit Program Agreement to be signed by each educational program prior to a site visit. The Commission also directed educational webinars and further study of alternative site visit methods for long-term implementation.

Continuing its work in Fall 2021, the Ad Hoc Committee on Alternative Site Visit Methods discussed the 2021 site visits and noted that March through August 2021 site visits were virtual, while August through December 2021 site visits may have been virtual, hybrid (at least one person on-site) or completely on-site depending on health and safety, institutional regulations, and site visitor preference during the COVID-19 pandemic. As required by the United States Department of Education (USDE), the Committee proposed revisions to the Commission's Policy on Temporary Use of Alternative Site Visit Methods to further clarify the types of site visits, which would require follow-up in-person visits, not only the visit modality (virtual, hybrid, in-person) but also the site visit type (new program, special focused, or regular site visit). The policy revisions also clarified the focus of the return site visit, with a proposed schedule, interviews and observations, and the document review to occur at the in-person follow-up visit.

At its Winter 2022 meeting, the Commission adopted and immediately implemented the proposed revisions to the Policy on Temporary Use of Alternative Site Visit Methods to include protocols for in-person follow-up site visits following virtual site visits. The Commission also directed staff to initiate the follow-up on-site visit planning, and to develop and disseminate to programs and CODA site visitors a template Site Visit Schedule and template Site Visitor Evaluation Report specific to the on-site visit process following a virtual site visit. Finally, to support the continued work of the Ad Hoc Committee, the Commission directed staff to gather data to facilitate the Ad Hoc on Alternative Site Visit Method's study of alternative site visit methods to identify whether any changes in processes or procedures for the conduct of site visits using alternative methods could be implemented long-term.

**Report and Recommendations of the Ad Hoc Committee on Alternative Site Visit Methods:**

At its Fall 2022 meeting, the Ad Hoc Committee concluded its meeting with a discussion of long-term considerations to the use of alternative site visit methods. The Committee noted that a lot has been learned from CODA's use of alternative site visit methods, as well as CODA's electronic accreditation portal. The Committee believed next steps included obtaining outcomes data so that the results from site visitor and program perspectives could be quantified and the equivalency measured more scientifically to assess the benefits and weaknesses of hybrid versus in-person site visits. For example, frequency of citations data, pre- and post-site visit survey data, and other factors may provide information that the Ad Hoc Committee could consider at a subsequent meeting. As directed by the Commission in Winter 2022, CODA staff was requested to collect information for continued review by the Ad Hoc Committee.

Ad Hoc Committee Meetings of May 23, 2023 and June 20, 2023: The members of the Ad Hoc Committee met on May 23, 2023 and June 20, 2023, with the following members in attendance: Dr. Frank Licari (chair), Dr. Victor Badner, Dr. Joel Berg (absent May 23, 2023), Dr. Barbara Krieg-Menning, Dr. Monica Nenad, Dr. Miriam Robbins, Dr. Timmothy Schwartz, and Dr. Marshall Titus (absent May 23, 2023). The Commission staff, as follows, were also in attendance: Dr. Sherin Tooks, senior director, and Ms. Jamie Asher Hernandez, Ms. Katie Navickas (absent May 23, 2023), Ms. Yesenia Ruiz, Ms. Peggy Soeldner and Ms. Kelly Stapleton, managers, CODA.

The Ad Hoc Committee reviewed background information and its charge for continued review of long-term considerations to the use of alternative site visit methods. The Committee engaged in lengthy discussions related to federal regulations, CODA processes, and future application of alternative site visit methods.

May 23, 2023 Meeting: The Ad Hoc Committee considered the Commission's progress on the alternative site visit methods that were previously adopted and implemented. The Ad Hoc Committee noted there were 37 allied return site visits, 33 advanced return site visits, and 4 predoctoral return site visits, which were either completed or would be completed by Fall 2023. The Committee also discussed the USDE's guidance that all recognized accrediting agencies must return to pre-COVID operations within 180 days following the expiration of the declared pandemic; this due date was scheduled for mid-October 2023. The Committee noted that CODA was on-track to meet the USDE's requirement and, further, that the Commission had returned to in-person site visits.

The Ad Hoc Committee again noted that the USDE requires an on-site visit of all educational programs under the Commission's purview. The USDE also recently clarified that the hybrid visit concept may only be permitted in special emergency cases (case-by-case) due to circumstances like illness, health conditions of site visitors, or flight cancellations, for example. While noting the current regulations, the Committee discussed the potential for a future review of some on-site visit components shifting to a hybrid modality. The Committee believed that moving toward some virtual components of a site visit, given adequate technology advancements, would allow the Commission to explore alternative site visit methods as a long-

term change. The Committee believed alternative site visit methods would be successful, if permitted, based on the experience of the Commission during the COVID-19 pandemic. For example, the Committee noted that alternative site visit methods are currently used for visitation or conferences with a program's educational activity sites. Currently, a team may select which sites to visit in-person; however, using virtual methods, a site visit team may be able to expand its access to more sites for review with some visited in-person and others virtually as part of the site visit.

The Ad Hoc Committee believed some components of the site visit could occur virtually in advance of the on-site review, thereby shortening the on-site process. The Committee also recognized that the different disciplines accredited by CODA may require different methods of conducting site visits. For example, due to the nature of dental public health education, this discipline may be accomplished completely virtually. Allied and advanced dental education programs may require more on-site components due to the nature of the site visit team composition. Whereas predoctoral site visit teams may be structured such that some visitors could participate virtually, for example, the finance site visitor.

The Ad Hoc Committee also noted challenges in virtual participation by site visitors. There could be concerns related to uninterrupted availability of a site visit team member who is attending a visit virtually, along with privacy issues, and other considerations that must be reviewed. Another concern noted is the current policy that stipends are issued to site visitors based on miscellaneous expenses resulting from travel. Therefore, a site visitor who participates virtually would not receive a stipend, although they would be required to spend a significant number of hours preparing for and participating in the site visit. The Committee noted anecdotal feedback given to CODA staff on this matter.

The Committee concluded with a discussion of additional information it would like to review to further discuss alternative site visit uses by the Commission as a long-term process of program review. The Committee requested information on alternative site visit methods used by other accrediting agencies, confirmation of the USDE requirements and potential future changes in regulation, and a review of data collected by the Commission on programs' and site visitors' perceptions of virtual and hybrid site visits.

June 20, 2023 Meeting: The Ad Hoc Committee considered additional information related to alternative site visit methods, including USDE guidance on potential use of alternative site visit methods, data collected from other accrediting agencies, and feedback from programs and site visitors related to virtual and hybrid site visits.

In review of the USDE guidance, it was noted that the accrediting agency must have enough site visitors on-site to validate all information in the self-study while on-site. In other words, a virtual review must not substitute for a comprehensive on-site review by an adequate number of site visitors who have the expertise to conduct the on-site assessment of the program's compliance with Accreditation Standards. The Committee also noted that CODA staff continue to support site visit teams virtually and will continue to do so, since staff provide support to the site visit team and are not peer reviewers. Staff virtual support allows for staff to assist more site

visit teams, as needed, while maintaining the staff support role. This protocol was discussed with the USDE, without concern; additionally, the Department noted that staff do not serve as reviewers and the USDE would be concerned if staff served in a reviewer role.

The USDE also indicated that the on-site visit must include a thorough on-site evaluation of every Accreditation Standard. The accrediting agency may not rely on the virtual component (in advance of an in-person visit) to confirm compliance in lieu of the on-site verification. The Committee further discussed the logistics of site visit team reviews occurring in advance of and during a site visit, noting that this process would significantly increase logistical planning necessary to conduct such an activity. The Committee again reiterated that site visit teams may use virtual meeting capabilities, as appropriate, to interview off-site personnel while being located on-site at the program's primary educational location.

Related to the methods used by other accrediting agencies, the Ad Hoc Committee noted that some accrediting agencies use virtual site visits for follow-up or special site visits. While CODA could consider this option, most of the Commission's special focused visits are required to visit facilities where students/residents/fellows spend a considerable amount of time; therefore, a virtual visit may not be appropriate. Overall, the Ad Hoc Committee noted that CODA's practices at this time align with the other accrediting agencies that are USDE recognized. The Ad Hoc Committee noted that one enhancement for further consideration may be requiring programs to provide a majority of "on-site" information in advance of the site visit through CODA's portal, and to remove those documents after the site visit. This practice could provide the site visit team with additional program information in advance of the site visit.

Finally, the Ad Hoc Committee considered aggregate program and site visitor feedback from the post-site visit surveys collected while CODA conducted virtual site visits (2021-2022) and hybrid site visits (2021-2023). The Committee noted overwhelmingly positive reviews from programs and site visitors on the site visit process for both virtual and hybrid visits. Additionally, site visitors believed the site visit process was fair and provided an appropriate review of all components of the program being evaluated. Additionally, there were overall favorable comments from both programs and site visitors related to CODA's E-Accreditation Portal; however, some individually reported difficulty using the system initially.

Following extensive discussion, the Ad Hoc Committee noted that a change to CODA's current site visit process is not warranted at this time. However, the Committee believed CODA should continue to monitor the Department of Education's regulations related to site visit processes permitted for use by recognized accrediting agencies. The Committee also believed the ongoing review of CODA's site visit process, including feedback from programs and site visitors through CODA's Post Site Visit Survey and the ongoing training of site visitors, aligns with CODA's strategic plan for continuous quality improvement of the Commission. While no changes are warranted to the site visit process at this time, the Ad Hoc Committee believed that the Commission should consider transitioning the Ad Hoc Committee to the "Standing Committee on Site Visit Process and Training."

The Ad Hoc Committee noted CODA staff provides training and guidance to programs in all areas noted below, which could also be discussed by the standing committee since there is no current standing committee of the Commission to oversee these important activities.

The new standing committee could provide input into the follow areas of the Commission's accreditation process:

- Monitor trends and USDE regulations related to CODA's site visit process;
- Evaluate site visit feedback from site visitors and programs;
- Review and develop protocols and materials to enhance the site visit process;
- Oversee and provide input on training for new and reappointed site visitors;
- Oversee and provide input on training for programs preparing for site visits, including development of the Self-Study, maintaining accreditation records, and documenting compliance; and
- Oversee and provide input to educate new program directors on working with the Commission (live and on-demand).

Following consideration, the Ad Hoc Committee believed the Commission should create a new standing committee, effective immediately.

**Ad Hoc Committee on Alternative Site Visit Methods Recommendations:** It is recommended that the Commission on Dental Accreditation direct that the Ad Hoc Committee on Alternative Site Visits be transitioned to a standing committee of the Commission named the Standing Committee on Site Visit Process and Training, effective immediately.

It is further recommended that the Commission on Dental Accreditation direct the Standing Committee on Site Visit Process and Training be assigned the following charge:

**Standing Committee on Site Visit Process and Training:**

- Monitor trends and USDE regulations related to CODA's site visit process;
- Evaluate site visit feedback from site visitors and programs;
- Review and develop protocols and materials to enhance the site visit process;
- Oversee and provide input on training for new and reappointed site visitors;
- Oversee and provide input on training for programs preparing for site visits; and
- Oversee and provide input to educate new program directors on working with the Commission.

**Commission Action:**