

REPORT OF THE REVIEW COMMITTEE ON DENTAL PUBLIC HEALTH EDUCATION TO THE COMMISSION ON DENTAL ACCREDITATION

Committee Chair: Dr. Victor Badner. Committee Members: Dr. Bruce Dye, Dr. Maya Popova, and Dr. Robert Weyant. Dr. Shannon Smith-Stephens attended a portion of the meeting. Commissioner Trainee: Dr. Catherine Hayes observed the meeting as a Commissioner trainee. Guests (Open Session Only, Virtual): Dr. Sheila Brear, chief learning officer, American Dental Education Association (ADEA), attended the policy portion of the meeting. Staff Members: Ms. Peggy Soeldner, manager, Advanced Dental Education; Dr. Yesenia Ruiz, manager, Advanced Dental Education; Dr. Sherin Tooks, senior director; and Ms. Michele Kendall, senior project assistant, Commission on Dental Accreditation (CODA). The meeting of the Review Committee on Dental Public Health Education (DPH RC) was held on July 12, 2024 via a virtual meeting.

CONSIDERATION OF MATTERS RELATED TO DENTAL PUBLIC HEALTH EDUCATION

Informational Report on Frequency of Citings of Accreditation Standards for Advanced Dental Education Programs in Dental Public Health (p. 600): The Review Committee on Dental Public Health Education (DPH RC) considered the annual report on the frequency of citings of the Accreditation Standards for Advanced Dental Education Programs in Dental Public Health implemented August 3, 2018. The DPH RC noted that 14 dental public health site visits have been conducted from August 3, 2018 through October 31, 2023. The report indicates a total of 12 areas of non-compliance have been cited. The most frequently cited dental public health-specific area of non-compliance, with two (2) citings, is the August 2018 version of Standard 2-4, which requires all faculty, including those at major and minor educational activity sites, to be trained to a standard to ensure consistency in training and evaluation of students/residents that supports the goals and objectives of the program. A revision to this Standard was adopted in February 2023 for implementation July 1, 2023. The Commission will continue to receive reports annually summarizing the updated data on the frequency of citings of individual Standards.

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

Consideration of Proposed Revisions to Accreditation Standards for Advanced Dental Education Programs Related to Sponsoring Organization and Authority to Operate (p. 601): At its Winter 2022 meeting, the Commission on Dental Accreditation (CODA) directed the formation of an Ad Hoc Committee of all advanced dental education Commissioners 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) review of the standard found in some advanced dental education disciplines that requires the sponsor to have proper chartering/licensure to operate and offer instruction leading to a degree,

diploma or certificate with recognized education validity. A summary of the work of the Ad Hoc Committee and Summer 2023 Review Committee and Commission review is found in **Policy Report p. 601**.

At its Summer 2024 meeting, the Review Committee on Dental Public Health Education (DPH RC) considered the proposed revision to the Accreditation Standards related to the Definition of Terms for Health Care Organization and to chartering and licensure to operate (**Appendix 1, Policy Report p. 601**). The Review Committee also considered all comments received by the Commission prior to the June 1, 2024 deadline (**Appendix 2, Policy Report p. 601**). The Review Committee noted that the Commission received no (0) comments at the virtual hearing in conjunction with the 2023 ADA Annual Meeting. The Commission received no (0) comments at the virtual hearing in conjunction with the 2024 ADEA Annual Session. The Commission office received four (4) written comments prior to the June 1, 2024 deadline.

The Review Committee concluded 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 DPH RC believed that the inclusion of the proposed definition and revisions in the Dental Public Health Accreditation Standards should have no impact on dental public health education programs. The Review Committee also considered potential revisions developed by Commission staff, provided at the meeting, to address the general concerns expressed among all comments received for the advanced dental education Standards. The comments received indicated that additional organizations may fulfill the requirement for an institutional accreditor (e.g. Health Resources and Services Administration Operational Site Visit), and there is a need to further clarify the method by which a program demonstrates its authority to operate and authority to confer a certificate and/or degree.

Through discussion of the proposed additional revisions, the DPH RC was reminded that DPH Accreditation Standards include a discipline-specific Standard (DPH Standard 1-1) that identifies institutions eligible to sponsor dental public health programs, including federal, state or local public health agencies, and schools of public health. The DPH RC expressed concern that the dental public health programs could be confused by the proposed common revisions to all advanced dental education Standards because of this dental public health-specific Standard. The DPH RC considered whether relocating DPH Standard 1-1 to be closer to the other Standards related to sponsoring institution eligibility would reduce the likelihood of confusion among the DPH programs. Following lengthy discussion, the DPH RC agreed relocating DPH Standard 1-1 would be beneficial and recommended it be moved, as presented in **Appendix 1**. Additionally, the DPH RC, agreed that the addition of the intent statement provides additional clarification, but believed the addition of Health Resources and Services Administration (HRSA) Operational Site Visit to the “must” statement is not warranted.

Following consideration, the Review Committee on Dental Public Health Education believed that the proposed Standards found in **Appendix 1**, which include additional wording to address

the general comments received by CODA, should be implemented January 1, 2025, and all related Commission documents be updated accordingly. The Review Committee did not believe that circulation of the revision was warranted since the additional revisions further clarified the intent of the Standards.

Recommendation: It is recommended that the Commission on Dental Accreditation adopt the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Dental Public Health related to the Definition of Terms for Health Care Organization and to chartering and licensure to operate, and modification of dental public health specific Standards (**Appendix 1**) and direct revision of all related documents, for implementation January 1, 2025.

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 MATTERS RELATED TO ACCREDITATION STATUS

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

Respectfully submitted,

Dr. Victor Badner
Chair, Review Committee on Dental Public Health Education

Commission on Dental Accreditation

At its Summer 2023 meeting, the Commission directed that the proposed revisions to Accreditation Standards for Advanced Dental Education Programs in Dental Public Health be distributed to the appropriate communities of interest for review and comment, with comment due June 1, 2024, for review at the Summer 2024 Commission meeting.

This document represents the proposed revisions based upon review of comment received from communities of interest from August 11, 2023 to June 1, 2024.

This document will be considered by the Commission in Summer 2024.

Revisions in RED, circulated August 11, 2023 to June 1, 2024

Revisions in GREEN, revisions following consideration by the Review Committee in Summer 2024

Additions are Underlined;
~~Strikethroughs~~ indicate Deletions

Accreditation Standards for Advanced Dental Education Programs in Dental Public Health

**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 (RESIDENCY), ORAL AND MAXILLOFACIAL SURGERY (RESIDENCY), 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.

1-1* Dental Public Health programs must be sponsored by federal, state or local public health agencies, dental schools, health facilities, schools of public health, or other institutions of higher learning.

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 (NDAC); The Compliance Team (TCT); The Joint Commission (JC).

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.

Intent: The educational program demonstrates either: a) documentation of receipt of federal aid as evidence to operate, or b) documentation of a state business license as evidence to operate. Additionally, as required by the state, the program demonstrates authority through an appropriate state agency when issuing a certificate of completion. If conferring a degree, the program demonstrates authorization from its institutional accrediting agency. Federally operated agencies receive operational and certificate granting authority through federal oversight.

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

The authority and final responsibility for curriculum development and approval, student/resident selection, faculty selection and administrative matters **must** rest within the sponsoring institution.

The institution/program **must** have a formal system of quality assurance for programs that provide patient care.

The position of the program in the administrative structure **must** be consistent with that of other parallel programs within the institution and the program director must have the authority, responsibility, and privileges necessary to manage the program.

~~1-1 Dental Public Health programs **must** be sponsored by federal, state or local public health agencies, dental schools, health facilities, schools of public health, or other institutions of higher learning.~~