

## **REPORT OF THE REVIEW COMMITTEE ON POSTDOCTORAL GENERAL DENTISTRY EDUCATION TO THE COMMISSION ON DENTAL ACCREDITATION**

Committee Chair: Dr. Miriam Robbins. Committee Members: Dr. Marc Henschel, Dr. Robert Hollowell, Dr. Edward O'Connor, Dr. Cornelius Pitts, Dr. Steven Rhodes, Dr. Anchita Venkatesh, and Dr. Michelle Ziegler. Dr. Sally Jo Placa was not in attendance. 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, senior manager and Ms. Bridget Blackwood, senior project assistant, Commission on Dental Accreditation (CODA). Dr. Sherin Tooks, senior director, CODA, and Ms. Samara Schwartz, senior associate general counsel, CODA, attended a portion of the meeting. The meeting of the Review Committee on Postdoctoral General Dentistry Education (PGD RC) was held on January 9, 2025 at the ADA Headquarters, Chicago, Illinois.

### **CONSIDERATION OF MATTERS RELATED TO POSTDOCTORAL GENERAL DENTISTRY EDUCATION**

**Informational Report on Advanced Education in General Dentistry and General Practice Residency Programs Annual Survey Curriculum Data (p. 200)**: At its Winter 2015 meeting, the Commission directed that all Review Committees consider the informational report on aggregate data from the Curriculum Section of the Annual Survey in years when this data is available. At this meeting, the Postdoctoral General Dentistry RC reviewed the informational report on aggregate data from the Curriculum Section for advanced education in general dentistry and general practice residency programs conducted in August/September 2024, without comment.

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

**Consideration of Proposed Revision to Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and General Practice Residency Related to the Optional Second Year (p. 201)**: At its Summer 2023 meeting, the Review Committee on Postdoctoral General Dentistry Education (PGD RC) briefly discussed the optional second year that may be offered by advanced education in general dentistry (AEGD) and general practice residency (GPR) programs, and noted the primary requirement is that the written goals and objectives or competencies for resident didactic and clinical training in the optional second year of training must be at a higher level than those of the first year of the program. Through discussion it was noted that some programs have designed the curriculum in the optional second year to focus on gaining additional experience in advanced general dentistry procedures beyond that gained through the first year of the program. The PGD RC also noted that some programs have designed the curriculum of the optional second year to focus on gaining training and experience in specific areas of dentistry, such as endodontics or oral and maxillofacial surgery as well as additional experiences in treating a select population of patients, such as patients with special needs or geriatric patients. However, these programs have minimal

expectations that residents also gain additional experiences in other advanced general dentistry treatment. No matter the specific focus, the PGD RC believed the optional second year should include experience in all areas of advanced general dentistry and may additionally include more focused training and experience in specific areas of dentistry or in treating select populations. Therefore, the PGD RC believed the Accreditation Standards related to the optional second year should be reviewed for possible revision to clarify the intent and expectations of the optional second year.

At its Winter 2024 meeting, the Review Committee on Postdoctoral General Dentistry Education reviewed the Accreditation Standards related to the optional second year for Advanced Education in General Dentistry programs and General Practice Residency programs for possible revision. Following lengthy discussion, the PGD RC concluded that the Accreditation Standards related to the optional second year should be revised to clarify that the optional second year must include experience in all areas of advanced general dentistry and may additionally include more focused training in specific areas of dentistry or in treating select populations. The PGD RC discussed the most effective way to provide the clarification, including revision to GPR and AEGD Standard 2-2, which lists the areas of dentistry that must be included in the program's curriculum or revision to the Standards that specifically address the optional second year in the AEGD Standards (Standard 2-13) and GPR Standards (Standard 2-17).

The PGD RC concluded the revisions should be made to AEGD Standard 2-13 and GPR Standard 2-17. Additionally, the PGD RC believed circulation of the revisions to the communities of interest for a period of six (6) months is warranted and sufficient because the revisions were clarifying in nature rather than a substantial requirement change. Therefore, the PGD RC recommended the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and General Practice Residency be circulated to the communities of interest for review and comment for a period of six (6) months with a Hearing conducted in conjunction with the March 2024 American Dental Education Association (ADEA) Annual Session, with comments reviewed at the Commission's Summer 2024 meetings. The Commission concurred with the recommendation of the PGD RC and directed circulation of the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and General Practice Residency to the communities of interest for review and comment for a period of six (6) months.

At its Summer 2024 meeting, the Review Committee on Postdoctoral General Dentistry Education (PGD RC) considered the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and General Practice Residency. The Review Committee also considered all comments received by the Commission prior to the June 1, 2024 deadline.

The Review Committee noted that following circulation of the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry, the Commission received no (0) comments at the virtual hearing in conjunction with the 2024

ADEA meeting. The Commission office received three (3) written comments prior to the June 1, 2024 deadline. Further, following circulation of the Accreditation Standards for Advanced Dental Education Programs in General Practice Residency, the Commission received one (1) comment at the virtual hearing in conjunction with the 2024 ADEA meeting. The Commission office received 30 written comments prior to the June 1, 2024 deadline.

The PGD RC reviewed all comments received and noted that many of the comments expressed concern that implementing the proposed revisions will create an unnecessary burden and hardship on the institutions and programs that offer a “focused” optional second year and that implementing the proposed revisions will limit educational opportunities for residents. Further, the PGD RC noted comments that indicated that residents may choose to apply for the optional second year seeking additional clinical experiences in specific areas of dentistry in which they do not feel ready to practice independently. Some comments also indicated that most of the graduates of the “focused” optional second year programs become practicing general dentists.

Through discussion, the PGD RC maintained that the intent of the optional second year is to provide opportunity for residents to gain additional and continued experience in advanced general dentistry procedures beyond that gained through the first year of the program. Further, the PGD RC believed that the curricula for programs that provide focused training and experience in specific areas of dentistry, or additional experiences in treating a select population of patients, should also include continued experiences in other areas of advanced general dentistry.

Following lengthy discussion, the PGD RC concluded that the proposed revisions warrant modification, based on the comments received, to allow flexibility, yet ensure that the optional second year includes continuing experiences in advanced general dentistry. To that end, the PGD RC recommended the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and Accreditation Standards for Advanced Dental Education Programs in General Practice Residency be circulated to the communities of interest for review and comment for a period of six (6) months with a Hearing conducted in conjunction with the October 2024 American Dental Association (ADA) Annual Session, with comments reviewed at the Commission’s Winter 2025 meetings.

At its Summer 2024 meeting, the Commission concurred with the PGD RC and directed circulation of the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and General Practice Residency to the communities of interest for review and comment for a period of six (6) months, with a Hearing conducted in conjunction with the October 2024 American Dental Association Annual Session, with comments reviewed at the Commission’s Winter 2025 meetings.

Winter 2025 PGD RC Meeting: The Postdoctoral General Dentistry Review Committee considered the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry (**Appendix 1, Policy Report p. 201**) and

General Practice Residency (**Appendix 2, Policy Report p. 201**). The Review Committee also considered all comments received by the Commission prior to the December 1, 2024 deadline (**Appendices 3 and 4, Policy Report p. 201**).

The Review Committee noted that following circulation of the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry, the Commission received no (0) comments at the virtual hearing in conjunction with the 2024 ADA meeting. The Commission office received six (6) written comments prior to the December 1, 2024 deadline. In addition, five (5) individuals initiated but did not complete or submit a comment.

The PGD RC also noted that following circulation of the Accreditation Standards for Advanced Dental Education Programs in General Practice Residency, the Commission received no (0) comments at the virtual hearing in conjunction with the ADA meeting. The Commission office received seven (7) written comments prior to the December 1, 2024 deadline. In addition, four (4) individuals initiated but did not complete or submit a comment.

The PGD RC reviewed the written comments and noted that, generally, the comments supported the proposed revisions or were unrelated to the proposed revisions. Following discussion, the PGD RC determined no further revisions to the Standards are warranted and recommended the proposed revisions found in **Appendix 1 and Appendix 2** be adopted with an implementation date of July 1, 2025.

**Recommendations:** It is recommended that the Commission on Dental Accreditation adopt the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry related to the optional second year (**Appendix 1**) and direct revision of all related documents, for implementation July 1, 2025.

It is further recommended that the Commission on Dental Accreditation adopt the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in General Practice Residency related to the optional second year (**Appendix 2**) and direct revision of all related documents, for implementation July 1, 2025.

### **Consideration of Proposed Revisions to Accreditation Standards for Advanced Dental Education Programs Related to Sponsoring Institution and Authority to Operate (p. 202)**

On October 11, 2024, the Commission on Dental Accreditation (CODA) received a request from Dr. Todd Thierer, Associate Dental Director, HealthPartners Dental Group and Director, Regions Hospital Advanced Education in General Dentistry Program, to consider a proposed revision to Standards for Advanced Dental Education Programs related to sponsoring institution and authority to operate (**Appendix 1, Policy Report p. 202**). Dr. Thierer believed revision to the Standards would provide clarification and proposed the revision found in **Appendix 2, Policy Report p. 202**.

The Review Committee on Postdoctoral General Dentistry Education (PGD RC) considered the proposed revisions from Dr. Todd Thierer (**Appendix 2, Policy Report p. 202**). Through discussion, the PGD RC was reminded that the revised Standards related to sponsoring institution and authority to operate were just recently implemented January 1, 2025. The PGD RC also noted that the language in the proposed revision is included in the current Standard. Following discussion, the PGD RC believed that since the current Standard was just implemented, revisions are not warranted at this time. However, the PGD RC agreed that future requests for further clarification could be considered.

In addition, the PGD RC learned that Commission staff recently identified that the list of accreditation organizations recognized by the Centers for Medicare and Medicaid Services (CMS) included in the Examples of Evidence of the Accreditation Standards found in **Appendix 3, Policy Report p. 202** has changed. Changes include the addition of one (1) organization, deletion of organizations, and changes in the acronyms listed for some organizations. It was also noted that institutional accreditation by some organizations included in the CMS may warrant further consideration to determine whether accreditation by these organizations should be an option for dental education programs.

The PGD RC reviewed the proposed revisions to the Examples of Evidence for Standard 1 of the Accreditation Standards for advanced dental education programs related to sponsoring institution and authority found in **Appendix 3, Policy Report p. 202** and noted the changes identified are editorial in nature and should be made in all relevant advanced dental education documents for all advanced dental disciplines under the Commission's purview. Because the revisions are located in the Examples of Evidence and are editorial in nature, the PGD RC believes circulation to the communities of interest is not warranted and the revisions should be approved for immediate implementation.

Finally, the PGD RC discussed whether all organizations included in the current list of accreditation organizations recognized by the Centers for Medicare and Medicaid Services (CMS) (**Appendix 3, Policy Report 202**) should be accepted for dental education programs. Following discussion, the PGD RC believed the consideration of whether accreditation by these organizations should be accepted for dental education programs is outside the purview of this committee.

**Recommendation:** It is recommended that the Commission on Dental Accreditation direct there be no revision at this time to the Accreditation Standards for advanced dental education programs related to sponsoring institution and authority to operate.

It is further recommended that the Commission on Dental Accreditation direct revision of the Examples of Evidence in Standard 1 of the Accreditation Standards for all advanced dental education disciplines under the Commission's purview, related to sponsoring institution and authority found in **Appendix 3**, with immediate implementation.

**Consideration of Accreditation Standards for Advanced Education in General Dentistry and General Practice Residency Programs Related to Administrative Oversight at Major Sites Where Educational Activity Occurs (p. 203):**

At its Winter 2024 meeting, the Commission on Dental Accreditation (CODA) directed an Ad Hoc or Standing Committee to investigate in-person, on-site work expectations for program directors to determine if changes are needed in the discipline-specific Accreditation Standards for dental education, advanced dental education, and allied dental education programs. As directed, in advance of the Summer 2024 CODA meeting, the Ad Hoc Committee, which was comprised of all current CODA Commissioners, reviewed the background materials, which included the Commission's action leading to the Ad Hoc Committee, and the Standards for each discipline related to program director (**Appendix 1, Policy Report p. 203**). The Committee noted that while all CODA Standards have a requirement for clinical supervision at all educational activity sites, most Standards do not address overall administrative oversight of the program, by the program director or a designee, at all sites where a student spends a majority or all their time. The Committee discussed whether virtual oversight or assignment of a responsible individual would be appropriate at all educational sites. The Committee believed there must be consistency in the educational program at all program sites. Following consideration, the Ad Hoc Committee concluded that each Review Committee that does not currently have a Standard related to administrative oversight at major educational activity sites (e.g., off-campus sites where students spend a majority or all their time) should review this topic and determine whether a Standard is needed to address the Commission's expectation for administrative oversight, for consideration by the Commission in Winter 2025. In considering this matter, the Commission noted that inclusion of Intent Statements, in conjunction with proposed Standards, could further clarify the flexibility permitted for programs to oversee educational sites in a variety of ways, while ensuring administrative oversight and consistency in the educational program across all sites. At its Summer 2024 meeting, the Commission on Dental Accreditation concurred with the recommendations of the Ad Hoc Committee.

At its Winter 2025 meeting, the Review Committee on Postdoctoral General Dentistry Education (PGD RC) considered the advanced education in general dentistry and general practice residency Accreditation Standards (**Appendix 1, Policy Report p. 203**) related to administrative oversight at major educational activity sites (e.g., off-campus sites where students spend a majority or all their time) to determine whether revisions are needed to address the Commission's expectation for administrative oversight. The Review Committee noted that administrative oversight is addressed in Standards 3-1 and Standard 3-3 for both disciplines.

Following consideration, the Review Committee determined that Standards already address overall administrative oversight of the program, by the program director or a designee, at all sites where a resident spends a majority or all their time. The Committee identified that Standard 3-1 in both discipline's Standards requires the program director to have authority and responsibility for all aspects of the program. In addition, the intent statement for this Standard includes evaluation of resident training and supervision in

affiliated institutions and off-service rotations as a program director's responsibility. Further, the intent statement includes the expectation that if the program director assigns duties, a formal plan for assignments will be developed. The PGD RC also noted that Standard 3-3 in both discipline's Standards requires an on-site clinical supervisor/director for each off-campus site. Therefore, the PGD RC concluded that no further revisions are needed within the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and Advanced Dental Education Programs in General Practice Residency.

**Recommendation:** It is recommended that the Commission on Dental Accreditation direct there be no revision at this time to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and Advanced Dental Education Programs in General Practice Residency related to administrative oversight at major sites where educational activity occurs.

**Consideration of Accreditation Standards for Advanced Education in General Dentistry and General Practice Residency Programs Related to Diversity and Humanistic Culture and Learning Environment (p. 204):** On December 1, 2023, the Commission received a letter from The National Coalition of Dentists for Health Equity (TNCDHE) (**Appendix 1, Policy Report p. 204**), which provided short-term and long-term suggestions to CODA to improve diversity in all academic dental, allied dental, and advanced dental education programs. In Winter 2024, each Review Committee of the Commission provided comment to CODA on TNCDHE letter. Following consideration of Review Committee Reports, the Commission directed establishment of an Ad Hoc Committee composed of all Commissioners who chair the discipline-specific Review Committees in dental, allied dental, and advanced dental education, and additional CODA Commissioners, to study the Accreditation Standards for possible revision related to the letter from TNCDHE.

In advance of the Commission's Summer 2024 meeting, the Ad Hoc Committee, which was comprised of all current CODA Commissioners, reviewed the background materials, which included the prior work of the Commission on this topic, the letters from TNCDHE, CODA Standards related to diversity and the humanistic culture including proposed revisions, Annual Survey data on dental programs related to diversity, and information from other accrediting agencies. The Committee noted that this is an important topic, but other considerations must also be acknowledged including differences among institutions related to missions, resources, funding, state and federal regulations, and legal considerations. It was noted that some states do not permit initiatives focused on diversity, and the Commission cannot impose Standards that would conflict with state or federal law. As such, the Committee noted the proposed predoctoral dental education Standard revision, which discusses diversity efforts, would be consistent with university policy and state law. At its Summer 2024 meeting, following consideration of the Ad Hoc Committee Report, the Commission directed that all Review Committees consider the proposed revisions for the Dental Standards 1-2 and 1-3 and revisions for the Oral and Maxillofacial Surgery Standards 1-11 and 2-1.7 (adopted Summer 2024), for possible inclusion

of similar Standards within the Review Committee's own discipline(s) to address diversity and the humanistic culture, with a report to the Commission in Winter 2025.

At its Winter 2025 meeting, the Review Committee on Postdoctoral General Dentistry Education (PGD RC) considered the advanced education in general dentistry and general practice residency Accreditation Standards, and reference materials including the proposed Dental Standards 1-2 and 1-3 and adopted revisions for Oral and Maxillofacial Surgery Standards 1-11 and 2-1.7 (**Appendix 2, Policy Report p. 204**) for possible inclusion of similar Standards to address diversity and the humanistic culture and learning environment. The Review Committee noted that the Goals in both the advanced education in general dentistry and general practice residency Accreditation Standards address these areas by including a goal related to "values of professional ethics, lifelong learning, patient centered care, adaptability, and acceptance of cultural diversity in professional practice." In addition, Standard 1-10 in both advanced education in general dentistry and general practice residency Accreditation Standards requires programs to "ensure residents can demonstrate the application of the principles of ethical reasoning, ethical decision making and professional responsibility as they pertain to the academic environment, research, patient care, and practice management."

Following consideration, the Review Committee determined that the Standards already address diversity and the humanistic culture and learning environment, as noted previously, in the Goals section and Standard 1-10 in both advanced education in general dentistry and general practice residency Accreditation Standards. Therefore, no further revisions are needed within the advanced education in general dentistry and general practice residency Accreditation Standards. The PGD RC also discussed that regulations or laws at both the federal and state levels may be changed or implemented in the future making it appropriate to reconsider revisions in the future.

**Recommendation:** It is recommended that the Commission on Dental Accreditation direct there be no revision at this time to the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry and Advanced Dental Education Programs in General Practice Residency related to diversity and the humanistic culture and learning environment.

#### **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 AREAS OF ADVANCED EDUCATION IN GENERAL DENTISTRY AND GENERAL PRACTICE RESIDENCY**



The Review Committee on Postdoctoral General Dentistry (PGD RC) considered site visitor appointments for 2025-2026. The Committee's recommendations on the appointments of individuals 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. Miriam Robbins  
Chair, Review Committee on Postdoctoral General Dentistry Education

# Commission on Dental Accreditation

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At its Summer 2024 meeting, the Commission directed that the proposed revisions to Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry be distributed to the appropriate communities of interest for review and comment, with comment due December 1, 2024, for review at the Winter 2025 Commission meeting.

**This document represents the proposed revisions based upon review of comments received from communities of interest from August 9, 2024 to December 1, 2024.**

**This document will be considered by the Commission in Winter 2025**

Additions are Underlined

## Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry



# Commission on Dental Accreditation

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**At its Summer 2024 meeting, the Commission directed that the proposed revisions to Accreditation Standards for Advanced Dental Education Programs in General Practice Residency be distributed to the appropriate communities of interest for review and comment, with comment due December 1, 2024, for review at the Winter 2025 Commission meeting.**

**This document represents the proposed revisions based upon review of comments received from communities of interest from August 9, 2024 to December 1, 2024.**

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Additions are Underlined

## **Accreditation Standards for Advanced Dental Education Programs in General Practice Residency**



1     **CONSIDERATION OF PROPOSED REVISION TO ACCREDITATION STANDARDS**  
2     **FOR ADVANCED DENTAL EDUCATION PROGRAMS RELATED TO SPONSORING**  
3     **INSTITUTION AND AUTHORITY TO OPERATE**  
4

5     Additions are Underlined  
6     ~~Strikethroughs~~ indicate Deletions  
7

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

- 9     • Accreditation certificate or current official listing of accredited institutions from a  
10     United States Department of Education recognized accreditation organization
- 11    • Evidence of successful achievement of Service-specific organizational inspection criteria
- 12    • Accreditation certificate or current official listing of accredited institution from an  
13     accreditation organization recognized by the Centers for Medicare and Medicaid Services  
14     (CMS). For example: Accreditation Association for Ambulatory Health Care (AAAHC);  
15     Accreditation Commission for Health Care, Inc. (ACHC); American Association for  
16     Accreditation of Ambulatory Surgery Facilities (~~AAAASFQuadA~~); American  
17     Osteopathic Association Healthcare Facilities Accreditation Program  
18     (AOA/HFAP); Center for Improvement in Healthcare Quality (CIHQ); Community  
19     Health Accreditation ~~Program-Partner~~ (CHAP); DNV ~~GL~~ Healthcare (DNV~~GL~~);  
20     National Dialysis Accreditation Commission (NDAC); The Compliance Team (TCT);  
21     The Joint Commission (~~TJC~~), National Association of Boards of Pharmacy (NABP),  
22     Utilization Review Accreditation Commission (URAC).
- 23    • Evidence of successful achievement of ~~receive~~ regular on-site inspections through  
24     the Health Resources and Services Administration Operational Site Visit (HRSA-  
25     OSV) process.  
26