

REPORT OF THE REVIEW COMMITTEE ON DENTAL HYGIENE EDUCATION TO THE COMMISSION ON DENTAL ACCREDITATION

Committee Chair: Dr. Monica Nenad. Committee Members: Ms. Denise Avrutik (virtual), Dr. Linda Boyd, Dr. Ngoc Chu, Ms. Mara Crow, Dr. Marcia Ditmyer, Ms. Patricia Guenther, Dr. James Harrison, Ms. Joanne Pacheco, Dr. Sharon Peterson, Dr. Carole Palmer (virtual), Dr. Paul Francis Tayag Ayson, and Ms. Maiga Van Haalen. Guests (Open Session Only, Virtual): Ms. Erin Sigmon, senior manager, Allied Dental Education, American Dental Education Association (ADEA), and Dr. JoAnn Gurenlian, director, Education, Research and Advocacy, American Dental Hygienists' Association (ADHA), attended the policy portion of the meeting. Staff Members: Ms. Katie Navickas, manager, Allied Dental Education, Ms. Jamie Asher-Hernandez, manager, Allied Dental Education (virtual), Mr. Daniel Sloyan, coordinator, Allied Program Reviews, and Ms. Zaira Perez-Lemon, senior project assistant, Commission on Dental Accreditation (CODA). Dr. Sherin Took, 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 Dental Hygiene Education (DH RC) was held on July 7-9, 2025 at the ADA Headquarters, Chicago, Illinois.

CONSIDERATION OF MATTERS RELATED TO DENTAL HYGIENE EDUCATION

Informational Report on Frequency of Citings of Accreditation Standards for Dental Hygiene Education Programs (p. 400)

The Review Committee on Dental Hygiene Education (DH RC) considered the annual report of the frequency of citings of the Accreditation Standards for Dental Hygiene Education Programs adopted on February 12, 2021, with implementation on July 1, 2022. Since that implementation date, 143 site visits have been conducted by visiting committees of the Commission utilizing the July 1, 2022 Standards. The data provided are based on the areas of non-compliance cited by visiting committees during site visits conducted July 1, 2022 through October 31, 2024 (**Appendix 1, Policy Report p. 400**).

The DH RC noted that data indicated a total of 373 areas of non-compliance were made during the period of reporting. Of these, 41 (10.99%) were related to Standard 1-Institutional Effectiveness; 163 (43.69%) were related to Standard 2-Educational Program; 93 (24.93%) were related to Standard 3-Administration, Faculty and Staff; 41 (10.99%) were related to Standard 4-Educational Support Services; 12 (3.22%) were related to Standard 5-Health and Safety Provisions; and 25 (6.70%) related to Standard 6-Patient Care Services.

The DH RC noted the analysis of the data indicates that the most frequently cited areas of non-compliance are within Standard 2-Educational Program. The subsets of Standard 2-12 were cited most frequently and received a total of 43 citations. Standard 2-12 (patient care competencies) requires graduates be competent in providing dental hygiene care for various patient types. Citations within Standard 2-12, patient types, were distributed as follows: child (10), adolescent (11), adult (6), geriatric (8), and special needs patients (8). Continued monitoring of Standard 2-12 and standards related to patient care is indicated. Standard 2-24 (curriculum management plan) was the second most frequently cited Standard with 33 citations;

the most frequently cited subset of Standard 2-24 was part “b” that requires evaluation of the effectiveness of all courses as they support the program’s goals and competencies, which received 14 citations. Standard 1-1 (outcomes assessment) and Standard 3-6 (faculty) were the third most frequently cited with 31 citations. Standard 1-1 had the most citings related to analyzing outcomes and using results for program improvements. The most frequently cited subset of Standard 3-6 was part “b” that requires documented background in current educational methodology concepts consistent with teaching assignments, which received 13 citations. Additionally, the fourth most frequently cited Standard was Standard 3-2 (program administrator), the dental hygiene program administrator must have a full-time appointment as defined by the institution, whose primary responsibility is for operation, supervision, evaluation and revision of the program, received 22 citations.

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

Consideration on Proposed Revisions to Standard 3-6 of the Accreditation Standards for Dental Hygiene Education Programs (p. 401): At its Winter 2023 meeting, the Commission on Dental Accreditation (CODA) considered a letter from 17 state dental associations related to workforce shortages in dental assisting and dental hygiene education programs. The Commission discussed the letter and directed that a formal letter be sent to the state dental associations requesting additional information on the request, and that an Ad Hoc Committee be established to consider ratios within the Commission’s Accreditation Standards. Subsequently, the Commission considered this matter in Summer 2023 and Winter 2024. At its Summer 2024 meetings, the Dental Hygiene Review Committee (DH RC) and Commission considered the Report of the Ad Hoc Committee to Study Dental Hygiene Standards Related to Ratios. The DH RC and CODA considered proposed revisions to Dental Hygiene Standard 3-6, related to faculty degree requirements, and also noted that the Ad Hoc Committee recommended no changes to Standards 3-3 (program administrator degree requirement) and 3-5 (faculty to student ratio).

At its Summer 2024 meeting, the DH RC discussed whether there should be a minimum number of years of experience for faculty who hold an associate degree and concluded that most institutions have hiring requirements for prior education and experience. The DH RC believed that the proposed revision to Standard 3-6 would enable programs to hire additional faculty to support the clinical phase of the program. Following consideration, the DH RC agreed with the findings of the Ad Hoc Committee including the proposed revisions to Dental Hygiene Standard 3-6, related to the faculty degree requirement and believed that the proposed revisions should be circulated to the communities of interest for review and comment for six (6) months, with a Hearing in conjunction with the October 2024 American Dental Association Annual Meeting, with comments reviewed at the Commission’s Winter 2025 meetings. The DH RC believed a shortened circulation was warranted since this change would benefit programs with hiring additional faculty to support student enrollment. At its Summer 2024 meeting, the Commission on Dental Accreditation concurred with the recommendations of the DH RC and directed circulation of the proposed revision to Standard 3-6.

At its Winter 2025 meeting, the Dental Hygiene Review Committee considered the proposed revision to Standard 3-6 of the Accreditation Standards for Dental Hygiene Education Programs that was circulated to the communities of interest for review and comment through December 1, 2024. The DH RC carefully reviewed and discussed all comments received during the period of public comment. The DH RC noted the comment portal permitted two (2) categories of response to indicate the respondent either agreed or disagreed with the proposed revision to Standard 3-6. While reviewing the specific comments made, the DH RC identified that the respondents may have selected “agree” or “disagree” with the proposed revision to Standard 3-6; however, in the additional comment section, the majority of the respondents provided a narrative response that further clarified agreement in some areas and disagreement in other areas of the proposed revision. For example, respondents may have disagreed with the portion of the revision that would permit internationally trained dental hygienists and dentists that hold credentials required by the state to teach in dental hygiene education programs, while agreeing with the proposed revision regarding the degree requirements of didactic, laboratory, and clinical faculty.

The Dental Hygiene Review Committee also considered the comments related to internationally trained dentists and dental hygienists serving as faculty within a dental hygiene education program. The DH RC concluded the majority of comments were in disagreement with this proposed revision. The “disagree” comments received by the Commission were related to the portion of the proposed revision for internationally trained dentists and dental hygienists requiring these individuals to hold credentials required by the state in lieu of the requirement for graduation from a CODA-accredited program as is required for all other faculty appointed after July 1, 2022. The DH RC discussed the comments on state licensure requirements and state teaching credentials as the reason given by individuals who disagreed with the proposed revision to this portion of the Standard. The comments discussed the variability of educational background and dental practice experience among internationally trained dentists and dental hygienists. The DH RC discussed the expectation that internationally trained faculty should have similar credentials to other faculty who graduated from a CODA-accredited program. The Review Committee concluded that this portion of the proposed revision to Standard 3-6 should be further revised to better communicate that the program could hire internationally trained dentists and dental hygienists if the faculty candidate met the institution’s and the state’s minimum requirements through a credentialing process. The DH RC reviewed the current Dental Education Standard 3-1 and focused on the qualifications and experience portions as a guide to continue the discussion regarding internationally trained dentists and dental hygienists teaching in dental hygiene education programs. The DH RC agreed that the wording found in Dental Education Standard 3-1 would capture the purpose of the revision to clarify that an internationally trained dentist or dental hygienist would have to be deemed qualified to teach in the dental hygiene program.

Following consideration, the Dental Hygiene Review Committee recommended that the Commission implement the proposed revision to Dental Hygiene Standard 3-6 related to the minimum degree requirement for faculty teaching didactic, clinical, and laboratory sciences, with immediate implementation. The DH RC also recommended that an alternate proposed revision to Dental Hygiene Standard 3-6 c, related to internationally trained dentist and dental hygienist

qualifications for teaching in a dental hygiene education program, be circulated with the emphasis on the individual being “qualified through appropriate knowledge and experience in the discipline as determined by the credentialing of the individual faculty as defined by the program/institution and state in which the program is located.” The DH RC believed that the proposed revision to Dental Hygiene Standard 3-6 c, should be circulated to the communities of interest for a period of six (6) months, with Hearings conducted in conjunction with the American Dental Education Association (ADEA) Annual Meeting, with review of all comments received by the Review Committee and Commission in Summer 2025.

At its Winter 2025 meeting, the Commission considered the recommendation of the Dental Hygiene Review Committee and adopted the revision to Standard 3-6 related to the minimum degree requirement for faculty teaching didactic, clinical, and laboratory sciences, with immediate implementation. The Commission also directed that the proposed revision to Dental Hygiene Standard 3-6 c in **(Appendix 1, Policy Report p. 401)** be circulated to the communities of interest for a period of six (6) months, with a Hearing conducted in conjunction with the American Dental Education Association (ADEA) Annual Meeting, with review of all comments received by the Review Committee and Commission in Summer 2025.

At this meeting, the Dental Hygiene Review Committee considered the proposed revisions to Standard 3-6 c of the Accreditation Standards for Dental Hygiene Education Programs **(Appendix 1, Policy Report p. 401)**, and the eight (8) formal written comments submitted through the Dental Hygiene Comment Portal prior to the June 1, 2025 deadline **(Appendix 2, Policy Report p. 401)**.

The DH RC discussed possible scenarios for faculty appointment in dental hygiene programs, related to the specific revision to Standard 3-6 c, and further considered how programs could interpret the revision when recruiting or hiring new faculty who are graduates of non-CODA accredited international dental and dental hygiene education programs. The DH RC noted the internationally trained dentist or dental hygienist “must be qualified through appropriate knowledge and experience in the discipline as determined by the credentialing of the individual faculty as defined by the program/institution and state in which the program is located.” The program will be expected to ensure compliance with state board licensing requirements, as applicable, and establish and apply program/institutional rules and regulations to credential internationally trained faculty. The Committee noted that most academic institutions already have credentialing processes when hiring faculty. The DH RC also carefully considered each of the eight (8) comments received through the Dental Hygiene Comment Portal. The DH RC concluded the proposed revision would allow Dental Hygiene Education Programs to expand their faculty pool, as needed, while assuring that all dental hygiene faculty are qualified to teach in CODA-accredited dental hygiene education programs without compromising the quality of the education provided to students. Additionally, the DH RC agreed that expanding the faculty pool could address the concerns of several organizations related to a need for additional faculty to support expansion of existing dental hygiene education programs and the development of new dental hygiene education programs to address workforce shortages. As a result, the DH RC recommended adoption of the proposed revision to Dental Hygiene Standard 3-6 c, **Appendix 1,**

with immediate implementation since this revision would benefit the dental hygiene education programs.

Recommendation: It is recommended that the Commission on Dental Accreditation adopt the proposed revision to Standard 3-6 c of the Accreditation Standards for Dental Hygiene Education Programs, found in **Appendix 1**, with immediate implementation.

Consideration of Proposed Revision to the Accreditation Standards for Dental Hygiene Education Programs Related to Faculty to Student Ratios (p. 402): On January 28, 2025, the Commission on Dental Accreditation (CODA) received a letter from Dr. Jason A. Tanguay, chair, American Dental Association Council on Dental Education and Licensure (ADA-CDEL) requesting that the Commission consider Resolution 401H-2024 Increasing Allied Personnel in the Workforce, adopted by the 2024 ADA House of Delegates (**Appendix 1, Policy Report p. 402**).

As noted in the ADA-CDEL letter:

Resolution 401H-2024 Increasing Allied Personnel in the Workforce urges the Commission on Dental Accreditation to review its Accreditation Standard for all allied dental education programs regarding faculty-to-student ratios to align with the Accreditation Standard for Predoctoral Dental Education Program. Further, this resolution urges CODA to adopt the following language currently in the Accreditation Standards for Predoctoral Dental Education for the Accreditation Standards for each of the allied dental education programs: The number, distribution, and qualifications of faculty and staff must be sufficient to meet the dental program's stated purpose/mission, goals, and objectives, at all sites where required educational activity occurs.

In consideration of this matter, the ADA-CDEL noted testimony emphasizing the importance of consistency across Accreditation Standards for all allied and predoctoral dental education programs. The ADA-CDEL expressed a position that, while workforce-related concerns fall outside CODA's direct purview, ensuring consistency in faculty-to-student ratio Standards across all allied dental education programs aligns with CODA's mission of supporting and improving program quality and enhances program flexibility while maintaining educational quality and standards. Therefore, the ADA-CDEL believes these revisions will promote consistency and program autonomy, thereby supporting the educational quality of allied dental education programs.

At this meeting, the Dental Hygiene Review Committee (DH RC) reviewed the ADA-CDEL letter and discussed the current state of dental hygiene education programs. The DH RC concurred with the ADA-CDEL's position that workforce-related concerns fall outside of CODA's purview. Additionally, the Review Committee noted the ADA has submitted requests to CODA over the past several meetings urging the Commission to revise Dental Hygiene Standard 3-5 (faculty to student ratio). The DH RC acknowledged that consistency is appropriate in certain areas of CODA's Accreditation Standards; however, the DH RC believed that the current faculty-to-student ratios in the Dental Hygiene Standards are intended to support dental hygiene

students, including opportunities for learning and feedback, and to provide adequate supervision of patient care.

The DH RC recalled the *Report of the Ad Hoc Committee on Faculty to Student Ratios in Accreditation Standards*, which was considered by the Commission during its Summer 2023 meeting and circulated to the DH RC for review in Winter 2024, as directed by the Commission. The Ad Hoc Committee's findings suggested that for dental hygiene programs, a change in faculty to student ratio would be "somewhat or extremely unlikely" to support the quality of patient care, support faculty recruitment and retention, or align with the current capacity of the programs' facilities.

The DH RC also noted that in response to its review of the first Ad Hoc Committee report in Winter 2024, the Review Committee recommended, and the Commission concurred, that a second *Ad Hoc Committee to Study Dental Hygiene Standards Related to Ratios* be appointed to further consider this matter, with a report to CODA in Summer 2024. In follow-up to the second Ad Hoc Committee's report, the DH RC proposed circulation of revisions to Dental Hygiene Standard 3-6 related to faculty credentials, which were adopted and immediately implemented in Winter 2025. Additionally, at this meeting, the DH RC has recommended further revision of Standard 3-6 related to dentist and dental hygienist faculty who graduated from programs not accredited by CODA. It is believed that both revisions to Dental Hygiene Standard 3-6 will positively affect dental hygiene education programs and will extend the available faculty pool as one mechanism to support program expansion.

The DH RC also noted a significant number of new dental hygiene education programs, which have been accredited by CODA in the past several years, and a significant number of enrollment increases reported by existing dental hygiene education programs. Additionally, the DH RC noted several programs have established satellite campuses to reach underserved communities and to enroll additional students to address workforce shortages.

Following consideration of this matter, the DH RC concluded that a revision of Standard 3-5 (faculty to student ratio) within the Accreditation Standards for Dental Hygiene Education Programs is not warranted at this time.

Recommendation: It is recommended that the Commission on Dental Accreditation direct there be no revision at this time to Standard 3-5, related to faculty-to-student ratios, of the Accreditation Standards for Dental Hygiene Education Programs.

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. Monica Nenad
Chair, Review Committee on Dental Hygiene Education

Commission on Dental Accreditation

At its Winter 2025 meeting, the Commission directed that the proposed revision to Accreditation Standards for Dental Hygiene Education Programs be distributed to the appropriate communities of interest for review and comment, with comment due June 1, 2025, for review at the Summer 2025 Commission meeting.

This document represents the proposed revisions based upon review of comments received from communities of interest from January 31, 2025 to June 1, 2025.

This document will be considered by the Commission in Summer 2025.

Additions are Underlined

Accreditation Standards for Dental Hygiene Education Programs

STANDARD 3 - ADMINISTRATION, FACULTY AND STAFF

Faculty

3-6 All faculty of a dental hygiene program who teach in a didactic course must possess a baccalaureate or higher degree. All faculty whose teaching is limited to a clinical and dental science laboratory course must possess an associate or higher degree._

All dental hygiene program faculty members must have:

- a) current knowledge of the specific subjects they are teaching.**
- b) documented background in current educational methodology concepts consistent with teaching assignments.**
- c) faculty who are dental hygienists or dentists must be graduates of programs accredited by the Commission on Dental Accreditation. A dentist who was appointed as a faculty prior to July 1, 2022 is exempt from the graduation requirement. An internationally trained dentist or dental hygienist must be qualified through appropriate knowledge and experience in the discipline as determined by the credentialing of the individual faculty as defined by the program/institution and state in which the program is located.**
- d) evidence of faculty calibration for clinical evaluation.**

Intent:

Faculty should have background in current education theory and practice, concepts relative to the specific subjects they are teaching, clinical practice experience and, if applicable, distance education techniques and delivery. These criteria apply to dentists and dental hygienists who supervise students' clinical procedures should have qualifications which comply with the state dental or dental hygiene practice act. Individuals who teach and supervise dental hygiene students in clinical enrichment experiences should have qualifications comparable to faculty who teach in the dental hygiene clinic and are familiar with the program's objectives, content, instructional methods and evaluation procedures.

Examples of evidence to demonstrate compliance may include:

- faculty curriculum vitae with recent professional development activities listed
- evidence of participation in workshops, in-service training, self-study courses, on-line and credited courses
- attendance at regional and national meetings that address education
- mentored experiences for new faculty
- scholarly productivity
- maintenance of existing and development of new and/or emerging clinical skills