

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

Committee Chair: Dr. Miriam Robbins. Committee Members: Dr. Jayson Huber, Dr. Edward O'Connor, Dr. Steven Rhodes, Dr. Eric Sung, Mr. Glenn Unser, and Dr. Michelle Ziegler. Dr. Frank Romano participated in the meeting virtually and Dr. Sally Jo Placa was unable to attend the meeting. Guest (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 and Ms. Bridget Blackwood, senior project assistant, Commission on Dental Accreditation (CODA). Dr. Sherin Tooks, director, CODA and Ms. Cathryn Albrecht, 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 July 13-14, 2023 at ADA Headquarters, Chicago, Illinois.

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

**Informational Report on Frequency of Citings of Accreditation Standards For Advanced Dental Education Programs in Advanced Education in General Dentistry (p. 200)**: The Review Committee on Postdoctoral General Dentistry Education (PGD RC) considered the annual report on the frequency of citings of the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry (AEGD) approved and adopted August 3, 2018 and noted that 68 site visits had been conducted between August 3, 2018 and August 4, 2022. Analysis of the data indicated that a total of 31 citings of non-compliance were made. Of these, 6 were related to Standard 1 – Institutional and Program Effectiveness; 17 were related to Standard 2 – Educational Program; 4 were related to Standard 3 – Faculty and Staff; and 4 were related to Standard 5 – Patient Care Services. No citings were related to Standard 4 – Educational Support Services. Analysis of the data indicates that the most frequently cited areas of non-compliance, with 3 citations each, were in Standards 1-9 (outcomes assessment process) and 3-9 (adequacy of allied dental personnel and clerical staff). The second most frequently cited standards with 2 each were 2-2d (advanced training in endodontic therapy), 2-3 (written curriculum plan), and 5-3 (continuous quality improvement process). The PGD RC noted this serves as the final report on the frequency of citings for the Accreditation Standards for Advanced Dental Education Programs in Advanced Education in General Dentistry implemented on August 3, 2018. Revised Accreditation Standards were adopted August 5, 2022 with immediate implementation.

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

**Informational Report on Frequency of Citings of Accreditation Standards For Advanced Dental Education Programs in Advanced Education in General Dentistry (p. 201)**: The PGD RC considered the frequency of citings of the Accreditation Standard for Advanced Dental

Education Programs in Advanced Education in General Dentistry (AEGD) approved and implemented August 5, 2022 and noted that since that date, five (5) AEGD site visits have been conducted utilizing the August 2022 Standards. The report indicates that a total of one (1) citing of non-compliance, related to Standard 2-2g was made. 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.

**Informational Report on Frequency of Citings of Accreditation Standards For Advanced Dental Education Programs in General Practice Residency (p. 202):** The Review Committee on Postdoctoral General Dentistry Education (PGD RC) considered the annual report on the frequency of citings of the Accreditation Standards for Advanced Dental Education Programs in General Practice Residency (GPR) adopted and implemented August 3, 2018 and noted that 71 site visits had been conducted between August 3, 2018 and August 4, 2022. Analysis of the data indicated that a total of 47 citings of non-compliance were made. Of these, 9 were related to Standard 1 – Institutional and Program Effectiveness; 23 were related to Standard 2 – Educational Program; 7 were related to Standard 3 – Faculty and Staff; 5 were related to Standard 4 – Educational Support Services; 4 were related to Standard 4-Educational Support Services, and 4 were related to Standard 5 – Patient Care Services. Further analysis of the data indicated that the most frequently cited areas of non-compliance, with 4 citations was 2-19 a (resident evaluations. The second most frequently cited areas of non-compliance with 3 citations each, were in Standards 1-5 (written agreements), 1-9 (outcomes assessment), and 2-2c (advanced training in periodontal therapy). The PGD RC noted this serves as the final report on the frequency of citings for the Accreditation Standards for Advanced Dental Education Programs in General Practice Residency implemented on August 3, 2018. Revised Accreditation Standards were adopted August 5, 2022 with immediate implementation.

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

**Informational Report on Frequency of Citings of Accreditation Standards For Advanced Dental Education Programs in General Practice Residency (p. 203):** The PGD RC considered the frequency of citings of the Accreditation Standard for Advanced Dental Education Programs in General Practice Residency (GPR) approved and implemented August 5, 2022 and noted that since that date, 10 GPR site visits have been conducted utilizing the August 2022 Standards. The report indicates that a total of five (5) citings of non-compliance were made. Of these, three (3) were related to Standard 2 – Educational Program, and two (2) were related to Standard 5 – Patient Care Services. Analysis of the data indicates that the most frequently cited area of non-compliance, with 2 citations, was Standard 5-4 (basic life support recognition/certification). 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 Revision to Accreditation Standards for Advanced Dental Education Programs Related to Sponsoring Organization and Authority to Operate (p.**

**204):** 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. 204**) 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. 204**), 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 PGD 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 the addition of requirements related to authority to operate, confer a certificate and, as applicable, confer a degree.

The PGD 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.

The PGD RC acknowledged that the inclusion of the proposed definition and revisions in the Advanced Education in General Dentistry and General Practice Residency Accreditation Standards may impact programs sponsored by community health centers, or other healthcare organizations. Therefore, the PGD RC believed it is critical to circulate the proposed revisions to the communities of interest to provide the opportunity for review and comment. The PGD RC recommended the revisions be circulated for a period of one (1) year. Further, the PGD RC noted that all programs that could be affected by the proposed revisions should carefully review the revisions and comment accordingly.

**Recommendation:** It is recommended that the Commission on Dental Accreditation direct circulation of the proposed revisions found in **Appendix 1** for Advanced Education in General Dentistry and **Appendix 2** for General Practice Residency, 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 POSTDOCTORAL GENERAL DENTISTRY EDUCATION**

Due to an ongoing need for additional site visitors, the Review Committee on Postdoctoral General Dentistry Education (PGD RC) considered site visitor nominations at this meeting. The Committee's recommendations on the nominations 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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Proposed Revisions to Definition of Terms and Standard 1-1

Additions are Underlined  
~~Strikethroughs~~ indicate Deletions

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

1       **PROPOSED REVISIONS TO ACCREDITATION STANDARDS FOR ADVANCED**  
2       **DENTAL EDUCATION PROGRAMS RELATED TO SPONSORING INSTITUTION**  
3                       **AND AUTHORITY TO OPERATE**

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6       Additions are underlined; Deletions are ~~stricken~~

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8       **PROPOSED REVISIONS FOR ALL ADVANCED DENTAL EDUCATION**  
9       **STANDARDS:**

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11       **Definition of Terms:**

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13       **Health Care Organization:** A Federally Qualified Health Center (FQHC), Indian Health  
14       Service (IHS), Veterans Health Administration system (VA), or academic health center/medical  
15       center/ambulatory care center (both public and private) that is accredited by an agency  
16       recognized by the United States Department of Education or accredited by an accreditation  
17       organization recognized by the Centers for Medicare and Medicaid Services (CMS).  
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1 **PROPOSED REVISIONS FOR STANDARD 1-1 FOR ADVANCED EDUCATION IN**  
2 **GENERAL DENTISTRY, ORAL MEDICINE, AND OROFACIAL PAIN:**  
3

4 Each sponsoring or co-sponsoring United States-based educational institution, hospital or health  
5 care organization **must** be accredited by an agency recognized by the United States Department  
6 of Education or accredited by an accreditation organization recognized by the Centers for  
7 Medicare and Medicaid Services (CMS).  
8

9 United States military programs not sponsored or co-sponsored by military medical treatment  
10 facilities, United States-based educational institutions, hospitals or health care organizations  
11 accredited by an agency recognized by the United States Department of Education or accredited  
12 by an accreditation organization recognized by the Centers for Medicare and Medicaid Services  
13 (CMS) **must** demonstrate successful achievement of Service-specific organizational inspection  
14 criteria.  
15

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

- 17 • Accreditation certificate or current official listing of accredited institutions from a United  
18 States Department of Education recognized accreditation organization
- 19 • Evidence of successful achievement of Service-specific organizational inspection criteria
- 20 • Accreditation certificate or current official listing of accredited institution from an  
21 accreditation organization recognized by the Centers for Medicare and Medicaid Services  
22 (CMS). For example: Accreditation Association for Ambulatory Health Care (AAAHC);  
23 Accreditation Commission for Health Care, Inc. (ACHC); American Association for  
24 Accreditation of Ambulatory Surgery Facilities (AAAASF); American Osteopathic  
25 Association Healthcare Facilities Accreditation Program (AOA/HFAP); Center for  
26 Improvement in Healthcare Quality (CIHQ); Community Health Accreditation Program  
27 (CHAP); DNV GL-Healthcare (DNV GL); National Dialysis Accreditation Commission  
28 (NDAC); The Compliance Team (TCT); The Joint Commission (JC).  
29

30 Advanced dental education programs conferring a certificate **must** have state or federal approval  
31 to operate and, as applicable, to confer a certificate. Advanced dental education programs  
32 conferring a degree **must** have institutional accreditation and authority to confer a degree.  
33

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

- 35 • State license or federal authority documenting the institution's approval to operate and  
36 confer a credential
- 37 • Institutional accreditation indicating approval to confer a degree  
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# Commission on Dental Accreditation

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Proposed Revisions to Definition of Terms and Standard 1-1

Additions are Underlined  
~~Strikethroughs~~ indicate Deletions

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

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

5  
6       Additions are underlined; Deletions are ~~stricken~~

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8       **PROPOSED REVISIONS FOR ALL ADVANCED DENTAL EDUCATION**  
9       **STANDARDS:**

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11       **Definition of Terms:**

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13       **Health Care Organization:** A Federally Qualified Health Center (FQHC), Indian Health  
14       Service (IHS), Veterans Health Administration system (VA), or academic health center/medical  
15       center/ambulatory care center (both public and private) that is accredited by an agency  
16       recognized by the United States Department of Education or accredited by an accreditation  
17       organization recognized by the Centers for Medicare and Medicaid Services (CMS).  
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1 **PROPOSED REVISIONS FOR STANDARD 1-1 FOR GENERAL PRACTICE**  
2 **RESIDENCY AND DENTAL ANESTHESIOLOGY:**  
3

4 The program **must** be sponsored or co-sponsored by either a United States-based hospital, or  
5 educational institution or health care organization that is affiliated with an accredited hospital.  
6 Each sponsoring and co-sponsoring institution **must** be accredited by an agency recognized by  
7 the United States Department of Education or accredited by an accreditation organization  
8 recognized by the Centers for Medicare and Medicaid Services (CMS).  
9

10 United States military programs not sponsored or co-sponsored by military medical treatment  
11 facilities, United States-based educational institutions, hospitals or health care organizations  
12 accredited by an agency recognized by the United States Department of Education or accredited  
13 by an accreditation organization recognized by the Centers for Medicare and Medicaid Services  
14 (CMS) **must** demonstrate successful achievement of Service-specific organizational inspection  
15 criteria.  
16

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

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19 States Department of Education recognized accreditation organization
- 20 • Evidence of successful achievement of Service-specific organizational inspection criteria
- 21 • Accreditation certificate or current official listing of accredited institution from an  
22 accreditation organization recognized by the Centers for Medicare and Medicaid Services  
23 (CMS). For example: Accreditation Association for Ambulatory Health Care (AAAHC);  
24 Accreditation Commission for Health Care, Inc. (ACHC); American Association for  
25 Accreditation of Ambulatory Surgery Facilities (AAAASF); American Osteopathic  
26 Association Healthcare Facilities Accreditation Program (AOA/HFAP); Center for  
27 Improvement in Healthcare Quality (CIHQ); Community Health Accreditation Program  
28 (CHAP); DNV GL-Healthcare (DNV GL); National Dialysis Accreditation Commission  
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35 **Examples of evidence to demonstrate compliance may include:**

- 36 • State license or federal authority documenting the institution's approval to operate and  
37 confer a credential
- 38 • Institutional accreditation indicating approval to confer a degree  
39