

**INFORMATIONAL REPORT ON FREQUENCY OF CITINGS
OF ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION
PROGRAMS IN OROFACIAL PAIN**

Background: Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain were approved by the Commission on Dental Accreditation at its August 2016 meeting and implemented on July 1, 2017. Since that date, eleven (11) orofacial pain site visits have been conducted by visiting committees of the Commission utilizing the July 1, 2017 Standards. At the time of this report, the Standards include 61 “must” statements addressing 108 required areas of compliance. This report presents the number of times areas of non-compliance were cited by visiting committees conducting site visits July 1, 2017 through October 31, 2023. If special (focused or comprehensive), pre-enrollment, or pre-graduation site visits were conducted during this period, citings from those visits are also included.

Analysis: The distribution of citings is presented in **Appendix 1**. At the time of this report, there were no (0) areas of non-compliance cited.

Summary: 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.

**ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION
PROGRAMS IN OROFACIAL PAIN**

Frequency of Citings Based on Required Areas of Compliance

Total Number of Programs Evaluated = 11
July 1, 2017 through October 31, 2023

Standard 1 – Institutional and Program Effectiveness (14 Required Areas of Compliance)

Standard 2 – Educational Program (63 Required Areas of Compliance)

Standard 3 – Faculty and Staff (8 Required Areas of Compliance)

Standard 4 – Educational Support Services (14 Required Areas of Compliance)

Standard 5 – Patient Care Services (8 Required Areas of Compliance)

Standard 6 – Research (1 Required Area of Compliance)

CONSIDERATION OF PROPOSED REVISIONS TO ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION PROGRAMS RELATED TO SPONSORING INSTITUTION AND AUTHORITY TO OPERATE

Background: 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.

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 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.

At the Commission’s Winter 2023 meeting, and following consideration of the Ad Hoc Committee’s recommendation, the Commission directed 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 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 Commission noted that 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 this 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.

At the Commission's Winter 2023 meeting, and following consideration of the Ad Hoc Committee's report, the Commission directed that the proposed revision related to chartering and licensure to operate 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..

Summer 2023 Review Committee and Commission Meetings: At its Summer 2023 meeting, as directed by the Commission, the Review Committee on Orofacial Pain Education (OFP 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. The Review Committee noted 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 OFP RC believed that the inclusion of the proposed definition and revisions in the Orofacial Pain Accreditation Standards should have no impact on orofacial pain education programs. The OFP RC also believed circulation of the proposed revisions to the communities of interest to provide the opportunity for review and comment is warranted.

Following consideration, the OFP RC recommended that the Commission direct circulation of the proposed revisions found in **Appendix 1**, 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. At its Summer 2023 meeting, the Commission on Dental Accreditation concurred with the recommendations of the Review Committee and directed circulation of the proposed revisions to the communities of interest for review and comment for one (1) year.

Summer 2024 Review Committee and Commission Meetings: As directed by the Commission, the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain (**Appendix 1**) were circulated for comment through June 1, 2024. The Commission received no (0) comments at the virtual hearing in conjunction with the ADA Annual Meeting. The Commission received one (1) comment at the virtual hearing in conjunction with the ADEA Annual Session (**Appendix 2**). The Commission office received one (1) written comment prior to the June 1, 2024 deadline (**Appendix 3**).

Summary: At its Summer 2024 meeting, the Review Committee on Orofacial Pain Education (OFP RC) is requested to consider 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**, and all comments received by the Commission prior to the June 1, 2024 deadline (**Appendices 2 and 3**). If further revisions are warranted, the Commission may wish to circulate the modified revisions to the communities of interest for an additional comment period. Alternatively, if the proposed revisions are adopted, the Commission may wish to consider an implementation date.

Recommendation:

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 Orofacial Pain 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.

Written comments will only be accepted through the Commission's Electronic Comment Submission Portal at this link:

https://surveys.ada.org/jfe/form/SV_ehqpjQ5m2uAYkTP

Additions are Underlined;
~~Strikethroughs~~ indicate Deletions

Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain

**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).

Consideration of Proposed Standards Revisions Related to
Sponsoring Institution and Authority to Operate
Orofacial Pain RC
CODA Summer 2024

**PROPOSED REVISIONS FOR STANDARD 1-1 FOR ADVANCED EDUCATION IN
GENERAL DENTISTRY, ORAL MEDICINE, AND OROFACIAL PAIN:**

Each sponsoring or co-sponsoring United States-based educational institution, hospital or health care organization **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).

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.

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.](#)

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](#)

**Commission on Dental Accreditation
Hearing on Accreditation Standards**

**Spring 2024 CODA Hearing on Standards
Thursday, March 21, 2024, 5:00pm - 6:00pm* Central Time
Virtual Hearing**

Commissioners in Attendance: Dr. Victor Badner, Dr. Ngoc Chu (attended a portion), Dr. Scott De Rossi, Dr. Cherae Farmer-Dixon, Dr. Maxine Feinberg (chair), Ms. LaShun James, Dr. George Kushner, Dr. Jessica Lee, Dr. Cataldo Leone, Dr. Frank Licari (vice chair), Dr. Keith Mays, Dr. Jeffery Price, and Dr. Miriam Robbins, and Ms. Lonnie Thompson (attended a portion).

Staff: Dr. Sherin Tooks, senior director, CODA, Ms. Katie Navickas, Ms. Yesenia Ruiz, Ms. Peggy Soeldner, and Ms. Kelly Stapleton, managers, CODA, and Ms. Marjorie Hooper, coordinator, CODA.

*The Hearing on Standards concluded at 6:30pm, in accordance with Commission policy, since limited comments were received, and the agenda was completed during that time.

**Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain
(Appendix 17)**

Name	Affiliation	Comment
Todd Their	Regents Hospital	State authorization to operate and to confer a certificate. This is confusing. What does it mean with state approval to operate. Also, what is meant by certificate – completion, attendance? Need to clarify what is being asked for by CODA, but no issue as to what CODA is proposing.

Response Summary:

The Commission on Dental Accreditation directed that the proposed revisions of Accreditation Standards for Orofacial Pain Education programs be distributed to the communities of interest for review and comment. The document is available at the [Commission website: https://coda.ada.org/standards#proposed-standards](https://coda.ada.org/standards#proposed-standards)

All communities of interest are invited to submit comment on the proposed revision through the link below. Please note that by submitting a comment you agree to the Commission publishing your name, title, affiliation and comment in a public forum through its policy reports at the meeting during which comments will be considered. The Commission will neither publish your contact information nor follow up with you related to the comment, including its successful or unsuccessful submission. Further, the Commission reserves the right to redact inappropriate and/or unprofessional comments.

Click next to submit a comment.

Q2. Please complete the requested information.

First Name	Annette
Last Name	Puzan
Email	[REDACTED]
Title	Manager, Dental Education & Licensure

Q3. Please select one of the following options that best describes you or your organization:

- Other (Please specify):
Council on Dental Education and Licensure (CDEL)

Q4. Is this an official comment from your organization?

- Yes. Please enter the name of your organization below.:
Council on Dental Education and Licensure (CDEL)

Q5. Enter the Standard number(s), page(s) and line(s) to which you would like to comment.

Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain

Q6. Do you agree with the proposed revision?

- Agree

Q7. Enter your comment. Type or copy and paste in the text box below.

The following comment is being submitted on behalf of the ADA Council on Dental Education and Licensure by Dr. Najia Usman, chair:

A duty of the ADA Council on Dental Education and Licensure is to act as the agency of the Association in matters related to the accreditation of dental, advanced dental and allied dental education programs. Accordingly, at its January 2024 meeting, the Council considered and supported the proposed changes to the Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain.

The Council appreciates the opportunity to submit comment on this important document.

Q8. Do you have additional comment?

- I have NO additional comment and ready to submit.

Scoring

- Score: 0
-

CONSIDERATION OF PROPOSED REVISIONS TO THE ACCREDITATION STANDARDS FOR ADVANCED DENTAL EDUCATION PROGRAMS IN OROFACIAL PAIN

Background: Through New Business at its Winter 2024 meeting, the Review Committee on Orofacial Pain Education (OFP RC) discussed concerns received anecdotally that baseline skills possessed by residents entering orofacial pain programs may be lacking. The OFP RC learned that, upon entering a program, all orofacial pain residents may not be competent in the baseline skills required for adequately and safely treating all orofacial pain conditions, procedures and techniques. Additionally, it is believed these skills are not consistently being taught in CODA-accredited programs. Since orofacial pain is one of the newest dental disciplines accredited by the Commission, the identification of such deficiencies and the need for additional curriculum requirements, and ultimately revision to Accreditation Standards, has been a dynamic process as accredited programs have matured and developed.

The OFP RC believed that an in-depth study of the Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain was warranted to identify areas of baseline clinical training that may require modification or addition, to ensure these areas are included in all programs' curricula and that graduates are consistently and sufficiently trained upon completion of the program. Therefore, the OFP RC concluded further study of the Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain was warranted. Further, the OFP RC believed the study and consideration of possible Accreditation Standards revisions should be conducted with a report to the Summer 2024 meeting of the Commission.

At its Winter 2024 meeting, the Commission considered the recommendation of the OFP RC and directed the Review Committee on Orofacial Pain Education to meet prior to the Summer 2024 meetings for further discussion and consideration of possible revision to the Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain, particularly related to the baseline competencies for the discipline, with a report to the Summer 2024 meeting of the Commission.

May 13, 2024 Meeting of the OFP RC: As directed by the Commission, the OFP RC conducted a virtual meeting on Monday, May 13, 2024. Members present were: Dr. Joseph Cohen (chair), Dr. Steve Bender, Dr. Bessie Katsilometes, and Dr. Robert Windsor. Dr. Reny deLeeuw was not in attendance. Additionally, Dr. Sherin Took, senior director, and Ms. Peggy Soeldner, manager, Advanced Dental Education, CODA, were in attendance.

The OFP RC began the meeting by reviewing the Commission's charge following its Winter 2024 meeting, followed by a brief discussion regarding the concerns leading to the recommendation to consider further review of the Standards for possible revision.

Through discussion, the OFP RC identified areas of clinical training that may require modification to ensure these areas of instruction are included in the curriculum of all CODA-accredited orofacial pain programs. Specifically, the OFP RC identified components of Standard 2-11, related to clinical training and direct patient experience in multidisciplinary pain management, that warrant conversion from “should” to “must.” In addition, the OFP RC identified specific clinical procedures and pharmacotherapeutic agents for inclusion in the Standards to ensure all orofacial pain education programs are required to include these areas within their curricula. Following lengthy discussion, the OFP RC concluded that the proposed revisions found in **Appendix 1** should be further considered at its Summer 2024 meeting, with a report and recommendations to the Commission for consideration in Summer 2024.

Summary: At this meeting, the OFP RC and the Commission are asked to consider the proposed revisions to the Accreditation Standards for Advanced Dental Education Programs in Orofacial Pain found in **Appendix 1**. The Commission may wish to circulate the modified revisions to the communities of interest for a period of comment. Alternately, if the proposed revisions are adopted, the Commission may wish to consider an implementation date.

Recommendation:

1 **CONSIDERATION OF PROPOSED REVISIONS TO THE ACCREDITATION**
2 **STANDARDS FOR ADVANCED DENTAL EDUCATION PROGRAMS IN**
3 **OROFACIAL PAIN**

4
5 Underline indicates Addition
6 ~~Strikethrough~~ indicates Deletion

7
8 **STANDARD 2 – EDUCATIONAL PROGRAM**

9
10 **Clinical Sciences**

- 11
12 **2-11** The program **must** provide instruction and clinical training and direct patient experience
13 in multidisciplinary pain management for the orofacial pain patient to ensure that upon
14 completion of the program the resident is able to:
15
16 a. Develop an appropriate treatment plan addressing each diagnostic component on the
17 problem list with consideration of cost/risk benefits;
18 b. Incorporate risk assessment of psychosocial and medical factors into the development
19 of the individualized plan of care;
20 c. Obtain informed consent;
21 d. Establish a verbal or written agreement, as appropriate, with the patient emphasizing
22 the patient’s treatment responsibilities;
23 e. Have primary responsibility for the management of a broad spectrum of orofacial
24 pain patients in a multidisciplinary orofacial pain clinic setting, or interdisciplinary
25 associated services. Responsibilities ~~should~~ **must** include:
26 1. intraoral appliance therapy;
27 2. physical medicine modalities;
28 3. diagnostic/therapeutic injections, including
29 a) trigger point injections,
30 b) nerve blocks, and
31 c) injections of the temporomandibular joint;
32 4. sleep-related breathing disorder intraoral appliances;
33 5. non-surgical management of orofacial trauma;
34 6. behavioral therapies beneficial to orofacial pain; and
35 7. pharmacotherapeutic treatment of orofacial pain including systemic and topical
36 medications, including muscle relaxants;

- 1 a) sedative agents for chronic pain and sleep management;
- 2 b) appropriate use of opioids in management of acute and chronic pain;
- 3 c) the adjuvant analgesic use of tricyclics and other antidepressants used for
- 4 chronic pain;
- 5 d) anticonvulsants, membrane stabilizers, and sodium channel blockers for
- 6 neuropathic pain;
- 7 e) local and systemic anesthetics in management of neuropathic pain;
- 8 f) anxiolytics;
- 9 g) analgesics and anti-inflammatories;
- 10 h) prophylactic and abortive medications for primary headache disorders;
- 11 i) therapeutic use of botulinum toxin injections, when appropriate; and
- 12 j) the treatment related medication side effects that alter sleep architecture.

13
14 ***Intent:*** This should include judicious selection of medications directed at the presumed
15 pain mechanisms involved, as well as adjustment, monitoring, and reevaluation.

16
17 ~~*Common medications may include: muscle relaxants; sedative agents for chronic pain*~~
18 ~~*and sleep management; opioid use in management of chronic pain; the adjuvant*~~
19 ~~*analgesic use of tricyclics and other antidepressants used for chronic pain;*~~
20 ~~*anticonvulsants, membrane stabilizers, and sodium channel blockers for neuropathic*~~
21 ~~*pain; local and systemic anesthetics in management of neuropathic pain; anxiolytics;*~~
22 ~~*analgesics and anti-inflammatory; prophylactic and abortive medications for primary*~~
23 ~~*headache disorders; and therapeutic use of botulinum toxin injections.*~~

24
25 ~~*In the treatment of patients, c*~~***Common issues may include:*** management of medication
26 ~~*overuse headache; medication side effects that alter sleep architecture;*~~ prescription
27 medication dependency withdrawal; referral and co-management of pain in patients
28 addicted to prescription, non prescription and recreational drugs; familiarity with the
29 role of preemptive anesthesia in neuropathic pain.