REPORT OF THE AD HOC COMMITTEE ON ALTERNATIVE SITE VISIT METHODS

**Background:** At its August 2020 meeting, the Commission on Dental Accreditation (CODA) considered ongoing operations in response to the COVID-19 pandemic and the impact on site visits. The Commission directed that it pursue alternative site visit methods, as needed to employ in 2021. The Commission further directed investigation and development of policies and procedures for alternative site visit methods, with a report to CODA in Winter 2021. The Commission believed that input from its 14 Review Committees on the elements of a site visit that may be conducted virtually versus the elements that must be reviewed on-site was warranted and, as such, directed that the 14 Review Committees be consulted related to this matter. Finally, the Commission directed the appointment of an Ad Hoc Committee to study virtual site visits, including development of policies and procedures for the conduct of virtual visits, for consideration by the Commission in Winter 2021.

At its Winter 2021 meeting, the Commission considered the Report of the Ad Hoc Committee on Alternative Site Visit Methods. Following extensive discussion, the Commission adopted the Policy on Temporary Use of Alternative Site Visit Methods, manuals for Site Visitors and educational programs on the Commission’s alternative site visit methods, and an Alternative Site Visit Program Agreement to be signed by each educational program prior to a site visit. The Commission also directed educational webinars and further study of alternative site visit methods for long-term implementation. A summary of the Commission’s actions is found in Appendix 1.

To continue its work on alternative site visit methods, the Ad Hoc Committee on Alternative Site Visit Methods met on December 15, 2021. The following members of the Committee were in attendance: Dr. Kevin Haubrick (chair), Dr. Joel Berg, Dr. Victor Badner, Dr. Susan Kass, Dr. Frank Licari, Dr. Miriam Robbins, and Dr. Marshall Titus. Dr. Timmothy Schwartz was unable to attend. Additionally, Dr. Bruce Rotter, chair, CODA, *ex officio*, was in attendance. Dr. Sherin Tooks, director, CODA, and Ms. Jamie Asher Hernandez, Ms. Jennifer Snow, and Ms. Peggy Soeldner, managers, CODA were also in attendance. Ms. Kirsten Nadler, manager, CODA, was unable to attend.

Below is the Ad Hoc Committee’s report and recommendations to the Commission following its December 15, 2021 meeting.

**Report and Recommendations of the Ad Hoc Committee on Alternative Site Visit Methods:**

The Ad Hoc Committee reviewed its charge and the information that was collected to support the work of the Committee. The Committee considered: 1) the Commission’s Policy on Temporary Use of Alternative Site Visit Methods; 2) a listing of 2021 site visits and modality (virtual, hybrid or in-person) for predoctoral, allied, and advanced dental education programs and next site visit dates; 3) information on budget implications to the conduct of in-person site visits; and 4) prior resources such as CODA’s developed manuals for site visitors and programs, and information from the United States Department of Education (USDE).
The Ad Hoc Committee discussed the 2021 site visits and noted that March through August 2021 visits were virtual, while August through December 2021 visits may have been virtual, hybrid (at least one person on-site) or completely on-site depending on health and safety, institutional regulations, and site visitor preference during the COVID-19 pandemic.

The Committee learned that Commission staff is attempting to schedule and facilitate 2022 site visits using the hybrid or in-person modality, which is now the preferred method. Since a virtual visit will require a secondary on-site evaluation, at this time the Ad Hoc Committee believes that virtual visits should occur only as needed in extreme cases where a hybrid or in-person visit cannot be planned, given the continuation of the COVID-19 pandemic.

The Ad Hoc Committee discussed CODA’s Policy on Temporary Use of Alternative Site Visit Methods, particularly related to the timeline for an in-person site visit following a virtual site visit. The Committee believed that the policy should be revised to state that the on-site visit to an educational program will occur within a reasonable amount of time following the virtual visit; however, given the ongoing nature of the COVID-19 pandemic and specific impact on regions of the United States, the 18 month period for the in-person visit may require flexibility.

The Committee noted the following revision should be made to CODA’s policy (underline indicates addition; strike-through indicates deletion): The on-site visit to the educational program will occur within a period not to exceed 18 months reasonable amount of time following the conduct of a virtual site visit unless cause exists to conduct the visit earlier, subject to CODA’s site visit schedule and ongoing health, safety, and/or travel concerns and/or restrictions. The Policy on Temporary Use of Alternative Site Visit Methods with proposed modifications is found in Appendix 2.

Programs to Conduct In-Person Follow-Up Site Visits:
The Committee affirmed CODA’s prior directive that hybrid and in-person visits would not require a secondary in-person review. These visits are structured to include all components of the site visit process and will be viewed as equivalent to an on-site visit, with no secondary visit required. While the Ad Hoc Committee believed that the rigor of a virtual site visit demonstrates an in-depth review of educational programs, the Committee understood that USDE regulations continue to require an in-person follow-up visit.

In further discussion, the Ad Hoc Committee considered the types of site visits, which will require follow-up in-person visits. Not only the visit modality (virtual, hybrid, in-person) but also the site visit type (new program, special focused, or regular site visit) should be considered in CODA’s decision to conduct the USDE-required in-person site visit. The Ad Hoc Committee noted that the USDE regulation addressed the regulatory requirement to perform a regular on-site inspection. The Commission’s regular on-site inspections occur every seven (7) years for all programs except oral and maxillofacial surgery, which is on a five (5) year cycle.
Given the USDE regulatory requirement for regular on-site inspection, the Committee believed the following protocol should be applied to conduct the in-person site visit following a virtual site visit:

- **Virtual Regular Site Visit** – A program that conducted its regular (5 or 7 year cycle) site visit virtually will have an on-site visit within a reasonable amount of time.
- **Virtual Special Focused Site Visit** – Since this type of site visit involves a special situation and does not alter the date of the program’s regular site visit, there will be no requirement to conduct the in-person site visit unless the Commission deems necessary.
- **Virtual New Program (Application) Site Visit:**
  - Developing Program – A developing program’s pre-enrollment site visit will be followed by a pre-graduation site visit. Additionally, programs that are four years in length are required to have a mid-initial accreditation site visit. Given the next site visit to a developing program will occur at the pre-graduation or mid-initial accreditation stage, there will be no requirement to conduct the in-person new program site visit unless the Commission deems necessary.
  - Fully Operational Program – A fully operational program will engage in a regular site visit and, if granted accreditation, will be placed on a regular site visit cycle (5 or 7 year cycle). Given the new program site visit conducted virtually and timeline for the next visit could be 5 to 7 years, this type of program will have an on-site visit within a reasonable amount of time.

The Policy on Temporary Use of Alternative Site Visit Methods with proposed additions of these policy actions is found in **Appendix 2**.

**Site Visit Team, Schedule, and Expectations of the In-Person Follow-Up Site Visit:**

In regard to the composition of the site visit team conducting the on-site follow-up visit, the Ad Hoc Committee believed that in order to ensure continuity of the review, one (1) site visitor who attended the virtual site visit to a single discipline should conduct the on-site follow-up visit. If two (2) or more programs were virtually visited at an institution, the Ad Hoc Committee believed that the team could consist of two (2) site visitors, total, representing at least two (2) disciplines. The final team composition for the on-site follow-up will be dictated by the Commission and may also include a virtual Commission staff. Again, the Ad Hoc Committee believed that the rigor of the virtual visit supports the structure for the in-person follow-up.

The Ad Hoc Committee then focused on the proposed schedule, interviews and observations, and the document review to occur at the in-person follow-up visit. The Ad Hoc Committee believed that the in-person follow-up visit should focus on the areas of the site visit that may have been difficult to accomplish virtually. The Committee determined that a template schedule should be developed to include the following components for all follow-up in-person site visits:

1) introduction to the visit; 2) tour of facilities (including educational activity sites, as needed); 3) clinical observations; 4) program records review related to items that could not be fully reviewed virtually (confidential document reviews, patient record reviews, etc.); and 5) review of the program’s progress on areas of noncompliance cited during the virtual site visit. Related to areas of noncompliance cited during the virtual site visit, it will be the Commission, through
review of the program’s ongoing progress reports and the findings of the on-site visit, which will determine the program’s compliance. Additionally, while not the focus of the in-person follow-up visit, if compliance concerns arise regarding additional Standards beyond those cited during the virtual site visit, the site visitor(s) will review the program’s compliance in these areas.

Following its discussion of these matters, the Ad Hoc Committee believed that it would be helpful for programs and site visitors to utilize a template Site Visit Schedule and template Site Visitor Evaluation Report specific to the on-site visit process following a virtual site visit. The Ad Hoc Committee determined that CODA staff could develop and disseminate these documents to the programs and CODA site visitors.

The Policy on Temporary Use of Alternative Site Visit Methods with proposed additions of these policy actions is found in Appendix 2.

Funding of In-Person Follow-Up Site Visits:
In accordance with the plan set forth above, the Ad Hoc Committee noted that the Commission would be required to conduct over 80 in-person follow-up site visits for those programs that had a virtual visit in 2021. Additionally, as the COVID-19 pandemic continues, there may be virtual visits in 2022 which will be required to undergo an in-person follow-up. The Ad Hoc Committee expressed concern related to the impact of these visits on CODA’s operating budget. The Ad Hoc Committee noted that programs pay double their annual fee in the year of their site visit and, as such, these programs have already paid a fee during the virtual visit year. The Commission does not have a mechanism to retain those funds to support future travel of volunteers to conduct the in-person follow-up. The Commission may wish to consider this matter further.

Future Considerations and Ongoing Work of the Ad Hoc Committee:
The Ad Hoc Committee concluded its meeting with a discussion of long-term considerations to the use of alternative site visit methods. The Committee noted that a lot has been learned from the past year and CODA’s use of alternative site visit methods, as well as CODA’s electronic accreditation portal. The Committee believes next steps include obtaining outcomes data so that the results from site visitor and program perspectives can be quantified and the equivalency measured more scientifically to assess the benefits and weaknesses of hybrid versus in-person site visits. For example, frequency of citations data, pre- and post-site visit survey data, and other factors may provide information that the Ad Hoc Committee could consider at a subsequent meeting. CODA staff was requested to collect information for continued review by the Ad Hoc Committee in Spring 2022, with a report to the Commission in Summer 2022.

Summary of Recommendations:
Following extensive discussion, the Ad Hoc Committee on Alternative Site Visit Methods believed that the proposed revisions to the Policy on Temporary Use of Alternative Site Visit Methods, and the process by which CODA will conduct in-person follow-up visits following a virtual site visit, should be approved and implemented immediately (Appendix 2). The Ad Hoc Committee also determined that virtual visits should occur only as needed in extreme cases.
where a hybrid or in-person visit cannot be planned, given the continuation of the COVID-19 pandemic. Finally, the Ad Hoc Committee requested that CODA staff gather data related to the site visit processes used in 2021 (virtual, hybrid, and in-person) in order to inform the Ad Hoc Committee’s study of the future use of alternative site visit methods and identify whether any changes in processes or procedures for the conduct of site visits using alternative methods could be implemented long-term.

**Ad Hoc Committee on Alternative Site Visit Methods Recommendations:** It is recommended that the Commission on Dental Accreditation adopt the proposed revisions to the Policy on Temporary Use of Alternative Site Visit Methods (*Appendix 2*) to include protocols for in-person follow-up site visits following virtual site visits, with immediate implementation.

It is further recommended that the Commission on Dental Accreditation direct staff to initiate the follow-up on-site visit planning, and to develop and disseminate to programs and CODA site visitors a template Site Visit Schedule and template Site Visitor Evaluation Report specific to the on-site visit process following a virtual site visit.

It is further recommended that the Commission on Dental Accreditation direct staff to gather data to facilitate the Ad Hoc on Alternative Site Visit Method’s study of alternative site visit methods to identify whether any changes in processes or procedures for the conduct of site visits using alternative methods could be implemented long-term.

**Commission Action:**

Prepared by: Dr. Sherin Tooks
WINTER 2021 MEETING MINUTES OF THE COMMISSION ON DENTAL ACCREDITATION

EXCERPT ON ACTION TAKEN RELATED TO THE REPORT OF THE AD HOC COMMITTEE ON ALTERNATIVE SITE VISIT METHODS

Report of the Ad Hoc Committee on Alternative Site Visit Methods: The Commission considered the Report of the Ad Hoc Committee on Alternative Site Visit Methods (Appendix 25). Through its review of this subject, the Ad Hoc Committee determined and recommended to CODA that alternative site visit methods could be used equally for reaccreditation (regular) site visits, as well as special focused site visits and visits to educational programs that had applied for accreditation by the Commission. The Commission noted that in all cases, the USDE expected that the accrediting agency return for an on-site review within a reasonable time following the conduct of a virtual site visit. The Ad Hoc Committee also concluded, and the Commission concurred, that CODA should delay all site visits to international locations until an in-person visit can be conducted. No aspect of an international program review by the Commission should occur virtually. Therefore, the Ad Hoc Committee’s recommendations are limited to U.S.-based programs, which are accredited by the Commission.

The Ad Hoc Committee further concluded that the Commission should proceed with alternative site visit methods, as necessary, and should plan to return to a program in a reasonable amount of time to conduct the USDE required in-person review. The Committee concluded that the in-person visit should occur within a time period not to exceed 18 months following the conduct of a virtual site visit. Additionally, the Committee determined that there may be visits that are conducted completely virtually (all site visits distant to the program) while others may be conducted in a hybrid fashion (at least one discipline-specific site visitor is on-site at the program at the time of the visit). If a hybrid visit were to occur, there would be no need for a subsequent in-person visit. The Committee noted that the USDE’s flexibility requires an in-person visit following a virtual visit, though not necessarily a full peer-review visit. Based upon this flexibility, the Committee believed a hybrid visit would satisfy the virtual and in-person review, given at least one discipline-specific site visitor would be on-site at the program’s facility during the evaluation. The Committee determined that the program’s next site visit date would be based upon its virtual/hybrid visit date using CODA’s formula of regular site visits occurring at seven (7) year intervals in all disciplines except oral and maxillofacial surgery, which occur every five (5) years. The Commission concurred with all of these recommendations.

Following review of the information gathered from CODA’s 14 Review Committees, it was noted that the Review Committees were generally calibrated and in agreement on the requirements for on-site versus virtual program review. The Review Committees and Ad Hoc Committee believed that a majority of the site visit could occur virtually, through submission of materials in advance to the site visitors and Commission office, as well as through confidential virtual site visit interviews. Program documentation that would typically be provided on-site
must be limited to only the materials absolutely necessary to demonstrate compliance, and be uploaded to CODA’s electronic accreditation portal along with the program’s self-study for review by the site visitors.

The Ad Hoc Committee felt, and the Commission concurred, that while a majority of the visit can occur virtually, on-site visits remain important, at least in some capacity, in order for the Commission and its site visitors to conduct the following aspects of program review: 1) clinical observation of patient care; 2) review of confidential program documents, including records that would be sensitive under regulations of patient, faculty, and student/resident/fellow privacy, although aggregate data should be provided for a virtual visit to demonstrate compliance; 3) clinic tours of the program’s facility and educational activity sites used by the program; 4) student/resident/fellow interview sessions, although initial interviews could occur virtually and be supplemented on-site; and 5) any other areas in which the virtual site visit did not result in sufficient review and verification of compliance by the program.

The Ad Hoc Committee believed that following a virtual visit, areas of non-compliance should be reviewed and monitored by the Commission, through its Review Committees based upon existing policies and procedures. If a program is reporting to the Commission on areas of noncompliance at the time of its on-site visit, the program will be expected to continue to report on progress directly to the Commission; however, the preexisting areas of non-compliance would not be included in the on-site visit review. The on-site visit would, generally, be limited to review of continued compliance with CODA policies on complaints and third party comments, as well as evaluation of standards related to the aforementioned five (5) areas, including clinical operations and student/resident/fellow clinical experiences, facility tours including educational activity sites, student/resident/fellow interviews, and review of on-site documentation that could not be transmitted during the virtual site visit, and any other items that arise during the on-site visit.

The Commission determined that the site visit schedule, whether virtual, hybrid, or in-person, should remain the same as CODA’s current site visit schedule. The virtual or hybrid site visit would be conducted based upon the time zone of the program being visited, and the program would be expected to prepare a schedule that includes references to all time zones in the United States in order to guide site visitors on the schedule. The Commission concluded that the program must be responsible to support the technology used for the visit, recognizing that Zoom is CODA’s preferred tool, including providing real-time virtual support to site visitors regarding technology issues that may arise. Accordingly, the language of the proposed guidance documents was modified to state (underline indicates addition): In order to conduct a virtual or hybrid site visit, the program being site visited must host the visit using their meeting technology (Zoom is preferred). If the program cannot comply with technological support, the site visit will be delayed and the program must submit a formal request for extension of accreditation using the Report of Program Change, which will be considered by the Commission at its next regular meeting. Additionally, the program would be expected to pre-set breakout rooms and provide
links on the site visit schedule to support the concept of individual, private conference rooms
which are used during an on-site visit. The program must also ensure the confidentiality of the
review process, including the Commission’s expectation that there be no recording of any kind
of the site visit process.

The Commission discussed the amount of time between a virtual visit and an on-site visit and the
workload on programs to address areas of non-compliance within a relatively shorter time
between these site visits, as well as the fact that programs are currently waiting to execute a site
visit, and that some of these programs have been waiting for more than a year to do so as a result
of COVID-19 health and safety issues resulting in no travel.

The Commission also discussed at length the Committee’s proposed process and policy
compared to existing Commission policy language. The Ad Hoc Committee report indicated
pre-existing areas of non-compliance would be reviewed by the Review Committee, and would
not be included in the on-site review. However, the guidance documents indicated that any
concerns raised during the virtual visit would be reviewed during the in-person visit, as is
CODA’s current process to review prior recommendations at the next site visit to the program.
The Commission believed further study of this matter is warranted. The Commission also noted
that the Committee’s recommendations included the future study of processes and procedures in
alternative site visit methods, and concurred that further study of alternative site visit methods
related to the on-site visit following a virtual site visit, and to identify whether any changes in
processes or procedures for the conduct of site visits using alternative methods could be
implemented long-term is also warranted.

**Commission Action:** The Commission on Dental Accreditation adopts the proposed,
amended Policy on Temporary Use of Alternative Site Visit Methods, with immediate
implementation (Appendix 26).

The Commission on Dental Accreditation further adopts the proposed, amended Site
Visitor Manual on Alternative Site Visit Methods, with immediate implementation
(Appendix 27).

The Commission on Dental Accreditation further adopts the proposed, amended Program
Manual on Alternative Site Visit Methods, with immediate implementation (Appendix
28).

The Commission on Dental Accreditation further adopts the proposed Alternative Site
Visit Program Agreement, with immediate implementation (Appendix 29).

The Commission on Dental Accreditation further directs staff to develop educational
webinars, either synchronous or asynchronous, to inform all affected individuals and
programs of the Commission’s expectations related to alternative site visit methods.
The Commission on Dental Accreditation further directs a future study of alternative site visit methods related to the on-site visit following a virtual site visit, and to identify whether any changes in processes or procedures for the conduct of site visits using alternative methods could be implemented long-term.
PROPOSED REVISIONS TO CODA POLICY ON TEMPORARY USE OF
ALTERNATIVE SITE VISIT METHODS

(Underline indicates addition; Strikethrough indicates deletion)

On March 13, 2020, a national emergency was declared due to the COVID-19 pandemic. As a result of the continued impact on travel, the Commission on Dental Accreditation (CODA) has determined temporary use of alternative site visit (i.e., virtual or hybrid site visit) methods may be necessary to fulfill the Commission’s obligation to conduct accreditation site visits to programs that are currently accredited by, or apply for accreditation by, the Commission. The term of this policy shall be in effect upon CODA approval and until the termination date of the temporary flexibility granted through the United States Department of Education.

Alternative site visit methods may be used to conduct site visits to U.S.-based dental education programs seeking accreditation (applicant programs) as well as regular reaccreditation and special focused site visits, as applicable. The conduct of a site visit using alternative methods will be based on travel, health and safety concerns and/or restrictions in the geographic location(s) that may be visited by the Commission’s staff and volunteers, or for other reasons deemed appropriate by the Commission during the pandemic (for example, institutional, local, state, or federal directives).

Alternative site visit methods may not be used for any portion of the international accreditation process, including but not limited to the CODA Preliminary Accreditation Consultation Visit (PACV) process and the CODA predoctoral dental education international accreditation process.

Alternative site visits may be entirely virtual (all site visitors remote), or hybrid (at least one (1) on-site Commission site visitor in the discipline), as determined by the Commission in consultation with the program and site visit committee, and subject to the Commission’s final decision.

- Virtual site visits will require an on-site visit by a Commission site visit team (with 1-2 team members per discipline and, as necessary, Commission staff), as dictated by the Commission. The on-site visit to the educational program will occur within a period not to exceed 18 months reasonable amount of time following the conduct of a virtual site visit unless cause exists to conduct the visit earlier, subject to CODA’s site visit schedule and ongoing health, safety, and/or travel concerns and/or restrictions. During the in-person visit, the Commission reserves the right to review the portions of the program that could not be completed virtually (e.g. facility tours, clinic observations, educational activity site tours, confidential document reviews, patient record reviews, etc.) and any areas in which concerns were raised during the virtual site visit, or other standards, policies and/or procedures that may arise during the course of the in-person site visit.

- Hybrid site visits will be structured to include all components of the site visit process, with both virtual and on-site review of the program by Commission site visitors. As such, the Commission will view the hybrid site visit as equivalent to an on-site visit, with no secondary visit required based solely upon the methodology used to conduct the site visit.
• Following the virtual (followed by a later on-site visit) or hybrid site visit, the program’s next regular reaccreditation on-site visit will be scheduled seven (7) years following the date of the virtual or hybrid site visit in all disciplines except oral and maxillofacial surgery (residency and fellowship), which will be scheduled five (5) years following the date of the virtual or hybrid site visit. The Commission reserves the right to conduct an earlier visit to the program in accordance with Commission policies and procedures (e.g. special focused site visit, pre-graduation site visit).

Generally, for all alternative site visit methods, the Commission’s current policy and procedure related to the conduct of a site visit and Commission review of site visit reports, progress reports, and other due process noted in the Evaluation and Operational Policies and Procedures will apply.

The following principles apply to the temporary use of alternative site visit methods:
• The program will be issued a preliminary draft site visit report following the site visit, regardless of site visit format, in accordance with Commission policy. The preliminary draft site visit report will be provided to the Commission along with the program’s response, should one be submitted, and the Commission will make an accreditation decision based on this report.
• When Accreditation Standards are revised during the period in which the program is submitting progress reports for either the virtual, hybrid or in-person site visit, the program will be responsible for demonstrating compliance with the new standards. Further, identification of new deficiencies during the reporting time period will not result in a modification of the specified deadline for compliance with prior deficiencies.
• In order to conduct a virtual or hybrid site visit, the program being site visited must host the visit using their meeting technology (Zoom is preferred). If the program cannot comply with technological support, the site visit will be delayed and the program must submit a formal request for extension of accreditation using the Report of Program Change, which will be considered by the Commission at its next regular meeting.
• All virtual/hybrid site visits will be conducted using the time zone of the program being visited, documenting all time zones using CODA’s site visit schedule template.
• Audio and/or video recording of the site visit is strictly prohibited.
• The Commission will dictate the portions of a site visit that will be conducted using alternative site visit methods.
  o The following applies to the conduct of a **virtual-only site visit**:
    • The Commission and its site visit team will dictate the final schedule of the site visit.
    • Tours of vacant facilities may be conducted virtually. However, all clinical observations and tours that may involve access to patients, will be conducted on-site only.
    • All program information must be provided to the site visitors in aggregate form and must conform to CODA’s privacy and data security policy. Documents that include Protected Health Information (PHI), Personally Identifiable Information (PII), FERPA or other confidential records will not be reviewed virtually.
Student/Resident/Fellow interviews will be conducted virtually and on-site.

All typical “on-site documentation” will be provided to the site visit committee and Commission in advance of the site visit, and must be limited to the essential documents to demonstrate a program’s compliance. The on-site documents will be uploaded to CODA’s electronic accreditation portal along with the program’s self-study. Following the site visit, the program’s “on-site documentation” will be securely destroyed and will not be retained in the program’s accreditation file, unless necessary to document a site visit finding.

The following applies to the conduct of a hybrid site visit:

- The Commission and its site visit team will dictate the final schedule of the site visit.
- All clinical observations and tours that may involve access to patients, will be conducted by the on-site visitor only. Tours of vacant facilities may be conducted virtually for the entire visiting committee.
- All program information must be provided to the site visitors in aggregate form and must conform to CODA’s privacy and data security policy. Documents that include Protected Health Information (PHI), Personally Identifiable Information (PII), FERPA or other confidential records will be reviewed on-site only.
- Student/Resident/Fellow interviews will be conducted virtually and on-site.
- All typical “on-site documentation” will be provided to the site visit committee and Commission in advance of the site visit, and must be limited to the essential documents to demonstrate a program’s compliance. The on-site documents will be uploaded to CODA’s electronic accreditation portal along with the program’s self-study. Following the site visit, the program’s “on-site documentation” will be securely destroyed and will not be retained in the program’s accreditation file, unless necessary to document a site visit finding.

The following protocol will be applied to the in-person site visit following a virtual site visit:

- **Virtual Regular Site Visit** – A program that conducted its regular (5 or 7 year cycle) site visit virtually will have an on-site visit within a reasonable amount of time.
- **Virtual Special Focused Site Visit** – Since this type of site visit involves a special situation and does not alter the date of the program’s regular site visit, there will be no requirement to conduct the in-person site visit unless the Commission deems necessary.
- **Virtual New Program (Application) Site Visit:**
  - Developing Program – A developing program’s pre-enrollment site visit will be followed by a pre-graduation site visit. Additionally, programs that are four years in length are required to have a mid-initial accreditation site visit. Given the next site visit to a developing program will occur at the pre-graduation or mid-initial accreditation stage, there will be no requirement to conduct the in-person new program site visit unless the Commission deems necessary.
  - Fully Operational Program – A fully operational program will engage in a regular
site visit and, if granted accreditation, will be placed on a regular site visit cycle (5 or 7 year cycle). Given the new program site visit conducted virtually and timeline for the next visit could be 5 to 7 years, this type of program will have an on-site visit within a reasonable amount of time.

To ensure continuity of the review, one (1) site visitor who attended the virtual site visit to a single discipline should conduct the on-site follow-up visit. If two (2) or more programs were virtually visited at an institution, the team could consist of two (2) site visitors, total, representing at least two (2) disciplines. The final team composition for the on-site follow-up will be dictated by the Commission and may also include a virtual Commission staff.

The in-person follow-up visit will focus on the areas of the site visit that may have been difficult to accomplish virtually. A template schedule will be developed to include the following components for all follow-up in-person site visits: 1) introduction to the visit; 2) tour of facilities (including educational activity sites, as needed); 3) clinical observations; 4) program records review related to items that could not be fully reviewed virtually (confidential document reviews, patient record reviews, etc.); and 5) review of the program’s progress on areas of noncompliance cited during the virtual site visit. Related to areas of noncompliance cited during the virtual site visit, it will be the Commission, through review of the program’s ongoing progress reports and the findings of the on-site visit, which will determine the program’s compliance. Additionally, while not the focus of the in-person follow-up visit, if compliance concerns arise regarding additional Standards beyond those cited during the virtual site visit, the site visitor(s) will review the program’s compliance in these areas.

A template Site Visit Schedule and template Site Visitor Evaluation Report specific to the on-site visit process following a virtual site visit will be provided through the Commission office.

Revised: 2/22; Adopted February 12, 2021