

## COMMISSION ON DENTAL ACCREDITATION

### GUIDELINES FOR PREPARING REQUESTS FOR TRANSFER OF SPONSORSHIP

#### REQUESTS FOR TRANSFER OF SPONSORSHIP OF ACCREDITED PROGRAMS

The sponsorship of an accredited program may be transferred from one educational institution to another without affecting the accreditation status of the program, provided the accreditation standards continue to be met following the transfer. A request for transfer of sponsorship will be considered by the Commission if significant aspects of the program will remain unchanged following the transfer.

Critical factors that will be weighed in review of the transfer of sponsorship request include: administration, funding sources, curriculum, faculty, facilities, and patient volume. If most of these critical factors will be unchanged, then the Commission will consider the request for transfer of sponsorship of the program. If most of these factors will be significantly altered following the change in sponsorship, then the program cannot be considered as a continuation of the same program under different sponsorship. Rather, the program to be offered by the new sponsoring institution will be considered as a new program and will be required to complete the established application process for initial accreditation appropriate to the discipline. If the program is viewed as a new program, the accreditation status of the previous program will be discontinued at an appropriate time.

Information regarding the transfer of sponsorship and its effect on the program's compliance with the accreditation standards must be submitted prior to implementation of the transfer. Written notice of the agreement to transfer sponsorship of the program must be provided to the Commission by both institutions; the new sponsor must explicitly indicate its willingness to accept responsibility for the transferred program. The information to be submitted must include the expected date of the transfer and the anticipated enrollment in each year of the program following the transfer. In addition, documentation must be submitted to demonstrate how the program will continue to meet the accreditation standards related to administration, financial support, curriculum, faculty and facilities. Any other changes that will occur in the program as a result of the transfer of sponsorship must also be explained and documented.

Programs anticipating a possible transfer of sponsorship are strongly encouraged to consult with Commission staff prior to submitting a request. The Commission has guidelines for preparing a request for transfer of sponsorship, to assist institutions in adequately explaining and documenting such changes.

The following alternatives may be recommended by Review Committees and/or be taken by the Commission in relation to the review of requests for transfer of sponsorship.

- *Approve the transfer of sponsorship:* If the Review Committee or Commission does not identify any concerns regarding the program's continued compliance with the accreditation standards, the transmittal letter should advise the institution that the

program will be reviewed at the next regularly-scheduled site visit to the new sponsoring institution. If concerns have been identified that are not of such a nature as to require the submission of additional information immediately, the concerns may be cited in the transmittal letter; the institution will be advised that the concerns will be reviewed at the time of the next regularly-scheduled site visit.

- *Postpone action and continue the program's accreditation status, but request additional information:* This action may be taken only once following submission of the initial request. The transmittal letter will inform the institutions that Commission action has been postponed because concerns regarding continued compliance with the accreditation standards have been identified. Additional specific information regarding the identified concerns will be requested for review by the Commission. The institutions will be further advised that, if the additional information submitted does not satisfy the identified concerns, the Commission reserves the right to conduct a special focused site visit of the program at an appropriate time following implementation of the transfer, or to deny the request.
- *Postpone action and continue the program's accreditation status pending conduct of a special site visit:* If the information submitted with the initial request is insufficient to provide reasonable assurance that the accreditation standards will continue to be met, and the Commission believes that the necessary information can only be obtained on-site, a special focused site visit to the new sponsoring institution will be conducted.
- *Deny the request for transfer:* If the submitted information does not indicate that the program will continue to comply with the accreditation standards, the Commission will deny the request for transfer of sponsorship. The institutions will be advised that they may re-submit the request with additional information if they choose.

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05/91:11

**PURPOSE:** The sponsorship of an accredited program may be transferred from one educational institution to another without affecting the accreditation status of the program, provided that the accreditation standards continue to be met following the transfer. The circumstances under which a request for transfer of sponsorship can be considered by the Commission are detailed in the policy statement on Requests for Transfer of Sponsorship of Accredited Programs. A written request must be submitted reported **by June 1 or December 1** and must be reviewed by the appropriate Review Committee and approved by the Commission to ensure that the program continues to meet the accreditation standards.

**CONSULTATION:** Programs anticipating a possible transfer of sponsorship are strongly encouraged to consult with the Commission staff prior to submitting a request. Staff will provide guidance in determining whether submission of the request is appropriate. In addition, consultation is available to assist programs in adequately explaining and documenting the impact of the transfer on the program's continued accreditation standards.

**PROCESS:** The Commission uses the following process when considering requests for transfer of sponsorship. Program administrators may consult with staff at any time during this process.

1. Initial notice of intent to transfer sponsorship of the program is provided to the Commission through correspondence from the chief executive officers of both the previous and the new sponsoring institutions. The new sponsor must explicitly indicate willingness to accept responsibility for the transferred program. The expected date of transfer and anticipated enrollment of the transferred program must be included.
2. Following submission of the initial notice of intent, a report is submitted to document how the program will continue to meet the accreditation standards. Specifically, the information must describe the resources that will be available relative to administration, financial support, curriculum, faculty and facilities. Any other changes that will occur in the program as a result of the transfer must also be explained and documented.
3. The report is reviewed for completeness. Additional information may be requested prior to review by the Commission if the transfer is not adequately documented.

The request is added to the appropriate agenda for the next scheduled meeting of the Commission. The chief executive officers of both institutions receive notice of the Commission's action following the meeting; a copy is sent to the program administrator.

**FORMAT:** The report must be clear and concise and must follow the “Format” and “Mechanics” illustrated within this guideline. Reports that fail to adhere to the stated guidelines may be returned to the program for proper formatting. For each change in the program being reported:

The informational report that documents the request for transfer **must** include a section for each of the accreditation standards that will be affected by the transfer of sponsorship (sponsoring institution accreditation, administration, financial support, curriculum, faculty, and facilities must be included). For each standard, as briefly and clearly as possible, describe the impact of the transfer on the program's ability to meet this standard. Include a description of the relevant aspects of the program and the resources available to support program goals **BEFORE** the transfer and **AFTER** the transfer to the new sponsoring institution.

1. Provide relevant documentation to illustrate how the program will continue to comply with the standard. For example, if the program will be relocated in different facilities, you should describe and document the facilities that will be used. Note: when you are deciding how to explain and document continued compliance, you may find it helpful to use the following approach:
  - a. **DESCRIPTION:** discuss **BEFORE** and **AFTER** the transfer;
  - b. **APPRAISAL AND ANALYSIS:** assess the **IMPACT** of the transfer;
  - c. **SUPPORTIVE DOCUMENTATION:** **EVIDENCE** that the program continues to meet the standards.

The Commission has directed that program materials be submitted electronically through a secure CODA electronic submission portal or by email, solely. **Paper copies and/or electronic copies mailed to the Commission office will not be accepted.**

**MECHANICS:** The following guidelines must be observed when preparing your report. Electronic Submission Guidelines are available and **must be strictly followed.**

**The Commission requires one (1) report be submitted for each program being transferred following the Electronic Submission Guidelines.** Failure to comply with these guidelines will constitute an incomplete report. Electronic Submission Guidelines are available on the CODA website at this link: <http://www.ada.org/en/coda/policies-and-guidelines/electronic-submission-guidelines>

1. COVER PAGE– Must include the following information:
  - a. name and address of both previous and new sponsoring institution
  - b. program name;
  - c. name, title, telephone number, e-mail address and signature of the program director;
  - d. name, title, telephone number, e-mail address and signature of the chief administrative officer of the current sponsoring institution;
  - e. name, title, telephone number, e-mail address and signature of the chief executive officer of the current sponsoring institution (the chief executive officer of the institution sponsoring the program must be copied on the letter to the Commission); and
  - f. name, title, telephone number, e-mail address and signature of the chief executive officer of the new sponsoring institution (the chief executive officer of the institution sponsoring the program must be copied on the letter to the Commission).

**The report must include a signed cover/verification page and must conform to the Commission’s electronic submission guidelines.**

2. DOCUMENTATION -- If documentation is extensive, include a LIST OF supporting documentation in a table of contents and in the text of the report, and include the actual items **in one (1) separate document that conforms to the electronic submission guidelines.**

*Institutions/Programs are expected to follow Commission policy and procedure on privacy and data security, including those related to compliance with the Health Insurance Portability and Accountability Act (HIPAA). The Commission’s statement on HIPAA, as well as the Privacy and Data Security Summary for Institutions/Programs (PDF), are found in the Policies/Guidelines section of the Commission’s website at <http://www.ada.org/en/coda/policies-and-guidelines/hipaa/>. Programs that fail to comply with CODA’s policy will be assessed an administrative fee of \$4000.*

**DEADLINES:** Reports **must** be submitted to the Commission **by June 1 or December 1** and must be reviewed by the appropriate Review Committee and approved by the Commission to ensure that the program continues to meet the accreditation standards.

**POLICY ON MISSED DEADLINES:** So that the Commission may conduct its accreditation program in an orderly fashion, all institutions offering programs accredited by the Commission are expected to adhere to deadlines for requests for program information. Programs/institutions must meet established deadlines to allow scheduling of regular or special site visits and for submission of requested information. Program information (i.e. self-studies, progress reports, annual surveys or other kinds of accreditation-related information requested by the Commission) is considered an integral part of the accreditation process. If an institution fails to comply with the Commission's request, or a prescribed deadline, it will be assumed that the institution no longer wishes to participate in the accreditation program. In this event, the Commission will immediately notify the chief executive officer of the institution of its intent to withdraw the accreditation of the program(s) at its next scheduled meeting.

Revised: 2/16; Reaffirmed: 8/20; 8/15; 8/10, 7/07, 7/01, 5/88

**POLICY ON PREPARATION AND SUBMISSION OF DOCUMENTS TO THE COMMISSION:** All institutions offering programs accredited by the Commission are expected to prepare documents that adhere to guidelines set forth by the Commission on Dental Accreditation, including required verification signatures by the institution's chief executive officer, the institution's chief academic officer, and program director. These documents may include, but are not limited to, self-study, responses to site visit/progress reports, initial accreditation applications, reports of program change, and transfer of sponsorship and exhibits. The Commission's various guidelines for preparing and submitting documents, including electronic submission, can be found on the Commission's website or obtained from the Commission staff.

In addition, all institutions must meet established deadlines for submission of requested information. Any information that does not meet the preparation or submission guidelines or is received after the prescribed deadlines may be returned to the program, which could affect the accreditation status of the program.

**Electronic Submission of Accreditation Materials:** All institutions will provide the Commission with an electronic copy of all accreditation documents and related materials, which conform to the Commission's Electronic Submission Guidelines. Electronic submission guidelines can be found on the Commission's website or obtained from the Commission staff. Accreditation documents and related materials must be complete and comprehensive.

Documents that fail to adhere to the stated Guidelines for submission will not be accepted and the program will be contacted to submit a corrected document. In this case, documents may not be reviewed at the assigned time which may impact the program's accreditation status.

**Compliance with Health Insurance Portability and Accountability Act (HIPAA)  
(Excerpt):**

The program's documentation for CODA must not contain any patient protected health information (PHI) or sensitive personally identifiable information (PII). If the program submits documentation that does not comply with the policy on PHI or PII, CODA will assess an administrative processing fee of \$4,000 per program submission to the institution; a program's resubmission that continues to contain PHI or PII will be assessed an additional \$4,000 administrative processing fee.

Revised: 8/20; Adopted 1/20 (Formerly Policy on Electronic Submission of Accreditation Materials, Commission Policy and Procedure Related to Compliance with the Health Insurance Portability and Accountability Act [HIPAA] and Policy on Preparation and Submission of Reports to the Commission)

**ASSISTANCE:** If you have questions, it is preferred that you contact staff via email. CODA staff emails can be found on the CODA website at the following link:

<https://www.ada.org/en/coda/accreditation/coda-membership/coda-staff>

Staff can also be contacted at the phone number and extension below: 312-440-(ext.)

- dental education programs and dental therapy programs, extension 2721;
- advanced dental education programs in dental public health, oral and maxillofacial pathology, oral and maxillofacial radiology, pediatric dentistry and prosthodontics, extension 2672;
- advanced dental education programs in endodontics, oral and maxillofacial surgery, orthodontics and dentofacial orthopedics and periodontics, and fellowships in oral and maxillofacial surgery and orthodontics and dentofacial orthopedics, extension 2714;
- advanced dental education programs in advanced education in general dentistry, general practice residency, dental anesthesiology, oral medicine and orofacial pain, extension 2788;
- dental assisting programs and dental laboratory technology programs, extension 4660; and
- dental hygiene programs, extension 2695

## Commission on Dental Accreditation Privacy and Data Security Reminders

*Protect sensitive personally identifiable information (“PII”) such as social security numbers, drivers’ license numbers, credit card numbers, account numbers, etc.*

### Security Reminder: Personally Identifiable Information

Before submitting any documents to CODA or to a CODA site visitor, an institution must:

- Review for PII and patient identifiers.
- Fully and appropriately redact any PII and patient identifiers.
- Make sure the redacted information is unreadable in hard copy and electronic form. You must use appropriate redaction methods to ensure personal information cannot be read or reconstructed.

CODA **does not accept** PII or patient identifiers in any materials submitted by a program.

### Security Reminder: Patient Identifiers

Before submitting any information about a patient to CODA or to a CODA site visitor, you must **thoroughly redact all 18 patient identifiers listed on the next page.**

Examples of information about a patient:

- Dental records
- Rosters of procedures (procedure logs)
- Chart review records (chart audit records)
- Information from affiliated teaching institutions, to include items listed above
- Brochures with patient images and/or information
- Presentations with patient images and/or information
- Course materials (exams, lecture materials) with patient images and/or information

If **even one** identifier is readable, do not submit the information to CODA.

CODA **does not accept** documents containing PII or patient identifiers from institutions. Any PHI/PII that is necessary for CODA accreditation may only be reviewed by CODA site visitors when they are on-site at the institution.

When redacting identifiers, you must ensure that the information is unreadable and cannot be reconstructed in both hard copy and electronic form. For example, certain information redacted on a hard copy can become readable when the hard copy is scanned. Instead, it may be effective to use opaque cover-up tape on the hard copy, scan, and then ensure the redacted information on the scanned version is not visible/readable through the redaction.

**Commission on Dental Accreditation**  
**Privacy and Data Security Requirements for Institutions**  
(Rev. 8/2021)

1. **Sensitive Information.** To protect the privacy of individuals and to comply with applicable law, the Commission on Dental Accreditation (“CODA” or “the Commission”) **prohibits all programs/institutions from disclosing in electronic or hard copy documents** provided to CODA other than on-site during a site visit, any of the following information (“Sensitive Information” or “PII”):
  - Social Security number
  - Credit or debit card number or other information (e.g., expiration date, security code)
  - Drivers’ license number, passport number, or other government issued ID
  - Account number with a pin or security code that permits access
  - Health insurance information, such as policy number or subscriber I.D.
  - Medical information, such as information about an individual’s condition, treatment, or payment of health care
  - Mother’s maiden name
  - Taxpayer ID number
  - Full date of birth
  - Any data protected by applicable law (e.g., HIPAA, state data security law)
  - Biometric data, such as fingerprint or retina image
  - Username or email address, in combination with a password or security question that permits access to an online account
  
2. **Patient Identifiers.** Before submitting information about a patient to CODA other than on-site during a site visit, a program/institution **must remove the following data elements** of the individual, and of relatives, household members, and employers of the individual (the “Patient Identifiers”):
  1. Names, including initials
  2. Address (including city, zip code, county, precinct)
  3. Dates, including treatment date, admission date, age, date of birth, or date of death [a range of dates (e.g., May 1 – 31, 2015) is permitted provided such range cannot be used to identify the individual who is the subject of the information]
  4. Telephone numbers
  5. Fax numbers
  6. E-mail addresses
  7. Social Security numbers
  8. Medical record numbers
  9. Health plan beneficiary numbers
  10. Account numbers
  11. Certificate/license numbers
  12. Vehicle identifiers and serial numbers, including license plate numbers



13. Device identifiers and serial numbers
14. Web Universal Resource Locators (URLs)
15. Internet Protocol (IP) address numbers
16. Biometric identifiers (e.g., finger and voice prints)
17. Full face photographic images and comparable images
18. Any other unique identifying number, characteristic, or code:
  - that is derived from information about the individual
  - that is capable of being translated so as to identify the individual, or
  - if the mechanism for re-identification (e.g., the key) is also disclosed

In addition, the information provided to CODA cannot be capable of being used alone or in combination with other information to identify the individual.

3. **Redaction.** When removing any Sensitive Information or Patient Identifier from paper or electronic documents disclosed to CODA, programs/institutions shall **fully and appropriately** remove the data such that the data cannot be read or otherwise reconstructed. Covering data with ink is not an appropriate means of removing data from a hard copy document and may sometimes be viewable when such documents are scanned to an electronic format.
4. **Administrative fee.** *If the program/institution submits any documentation that does not comply with the directives noted above, CODA will assess an administrative fee of \$4000 to the program/institution; a resubmission that continues to contain prohibited data will be assessed an additional \$4000 fee.*
  - CODA Site Visitors and Commission volunteers are only authorized to access Sensitive Information and Patient Identifiers:
    - Onsite during a site visit, and
    - That are necessary for conducting the accreditation site visit
  - CODA Site Visitors and Commission volunteers may not download or make hard copies or electronic copies of Sensitive Information or Patient Identifiers.

**NOTE: If a document includes fictitious information, which may otherwise appear to be Sensitive Information or Patient Identifiers, the program is expected to clearly mark the document as “Fictitious Example”.**