

**COMMISSION ON DENTAL ACCREDITATION
GUIDELINES FOR REPORTING AN INTERRUPTION OF EDUCATION
RELATED TO COVID-19 FOR THE CLASS OF 2021**

K. POLICY ON INTERRUPTION OF EDUCATION

Interruption of an educational program due to unforeseen circumstances that take faculty, administrators or students away from the program is a potentially serious problem. If such interruption may compromise the quality and effectiveness of education, the Commission must be notified in writing of any such disruption. The institution must provide a comprehensive plan for how the loss of instructional time will be addressed. A program which experiences an interruption of longer than two (2) years will be notified of the Commission's intent to withdraw accreditation at its next scheduled meeting.

Revised: 8/15; 8/10, 5/91, 1975; Reaffirmed: 8/20; 7/07, 7/01

The Commission recognizes that unexpected interruption of education due to unforeseen circumstances that take faculty, administrators or students away from the program is a potentially serious problem and can compromise the program. **In October 2020, the Commission directed that all educational programs submit a report on interruption of education for the Class of 2021 by March 19, 2021. The Commission expects one (1) comprehensive report from each program that reflects all aspects of temporary flexibility that were used by the program up to the time of submission; therefore, programs should submit reports no earlier than March 2021.** The appropriate Review Committee and the Commission will review the program's written interruption of education report in spring 2021.

*Modification of the program due to an interruption of education will be viewed by the Commission as a temporary solution to maintain educational quality and compliance with Accreditation Standards. Following the interruption of education, should the program subsequently decide to permanently implement a change, the program **must** submit a formal Report of Program Change for consideration by the Commission.*

The following alternatives may be recommended by Review Committees and/or be taken by the Commission in relation to the review of reports of interruption of education received from accredited educational programs.

- *Approve the report of interruption of education:* 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 change(s) related to interruption of education have been noted and will be reviewed at the next regularly-scheduled site visit to the program.
- *Approve the report of interruption of education and request additional information:* If the Review Committees or Commission does not identify any concerns regarding the program's compliance with the accreditation standards, but believes follow up reporting is required to ensure continued compliance with accreditation standards, additional information will be requested for review by the Commission. Additional information could occur through a supplemental report or a focused site visit.

- *Postpone action and continue the program's accreditation status, but request additional information on the interruption of education:* The transmittal letter will inform the institution that the report of interruption of education has been considered, but that 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 institution will be further advised that, if the additional information submitted does not satisfy the Commission regarding the identified concerns, the Commission reserves the right to request additional documentation, or conduct a special focused site visit of the program, or deny the report on interruption of education.
- *Postpone action and continue the program's accreditation status pending conduct of a special site visit related to the interruption of education:* If the information submitted with the interruption of education 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 will be conducted.
- *Deny the report on interruption of education:* If the submitted information does not indicate that the program will continue to comply with the accreditation standards, the Commission will deny the report on interruption of education. The institutions will be advised that it must re-submit a report on interruption of education which provide a comprehensive plan for how the loss of instructional time will be addressed and continued compliance with accreditation standards will be maintained. Additionally, if the program has implemented plans that indicate it is out of compliance with accreditation standards, its accreditation status will be changed and a report of non-compliance will be requested.

**GUIDELINES FOR REPORTING AN INTERRUPTION OF EDUCATION
RELATED TO COVID-19 FOR THE CLASS OF 2021**

PURPOSE: A “report of interruption of education” informs the Commission that due to unforeseen circumstances there has been a disruption in the educational program that takes faculty, administrators or students away from the program (e.g. a natural disaster or similar event). **An interruption of education may have a direct and significant impact on the program’s potential ability to comply with the Accreditation Standards.** The institution must provide a comprehensive plan for how the loss of instructional time will be addressed. The institution’s/program’s plan must address, as applicable, any disruption to didactic, laboratory, preclinical, and/or clinical components of the educational program.

FORMAT FOR INTERRUPTION OF EDUCATION REPORT: The report must be **clear and concise** and must follow the “Format” and “Mechanics” illustrated within this guideline. **Reports related to the interruption of education, including appendices, may not exceed five (5) pages.** Reports that fail to adhere to the stated guidelines may be returned to the program for proper formatting.

Instructions for Reporting Interruption of Education Due to COVID-19 for the Class of 2021:

- All CODA-accredited programs must attest to the status of the educational curriculum with regard to temporary flexibility for the Class of 2021.
- **Table 1** – Must be completed by all CODA-accredited programs. If the program answers “NO” to any portion of Table 1, Question 2 it must complete Table 2.
- **Table 2** – Must be completed by CODA-accredited programs that have utilized additional or substantially different temporary flexibility for the Class of 2021, beyond the temporary flexibility previously approved by CODA for the Class of 2020.

<u>Table 1: Report the Program’s Ongoing Need for Temporary Flexibility for the Class of 2021</u>	
<u>CODA Question</u>	<u>Program Response</u>
1. For the Class of 2021, has the program returned to full (pre-COVID) operation?	<p>YES or NO</p> <p><i>If YES, include a statement that the program has returned to full (pre-COVID) operations at the time of submission and no additional flexibility was utilized beyond what CODA approved for the Class of 2020.</i></p>

	<p><i>After answering Question 1, all programs must answer Question 2.</i></p>
<p>2. For the Class of 2021:</p> <p>a) Has/Had the program maintained the <u>exact same</u> temporary flexibility, which was previously approved by CODA for the Class of 2020?</p> <p>b) Has/Had the program <u>provided an adequate/sufficient number of patient experiences</u> in accordance with the discipline-specific Accreditation Standards prior to evaluation of the competence of its students/residents/fellows? <i>(The program is expected to provide adequate patient experiences in all areas of the program’s competencies within the clinical curriculum, in accordance with the discipline’s Temporary Flexibility Guidance.)</i></p>	<p>a) YES or NO</p> <p>b) YES or NO</p> <p><i>If Yes to both “a” and “b,”:</i></p> <p><i>a) Include a statement that the program attests that the exact same temporary flexibility approved by CODA for the Class of 2020 has been applied for the Class of 2021 with no modifications.</i></p> <p><i>b) Include an additional statement that the program attests that the Class of 2021 has had or will have had an adequate number of patient experiences in accordance with the discipline-specific standards prior to evaluation of student/resident/fellow competence.</i></p> <p><i>If YES to both “a” and “b,” the program is not required to complete Table 2.</i></p> <p><i>If NO to either “a” or “b,” the program must complete Table 2.</i></p>

Instructions for Table 2: To the extent necessary, address all areas that have been or continue to be impacted by the interruption of education for the Class of 2021 beyond the temporary flexibility previously approved by the Commission. Document the interruption of education as briefly, clearly, and completely as possible.

Address each area where the program has made additional or substantially different changes beyond those previously approved by the Commission or where there are changes in adequate/sufficient patient experiences and attach supporting documents, as necessary, to demonstrate continued compliance with Commission Accreditation Standards.

The program’s compliance with Accreditation Standards that may have been impacted by changes and temporary flexibility in the academic environment must be addressed, even if these

Standards are not listed within the flexibility guidelines (e.g., financial changes, faculty changes, patient resources, etc.). Therefore, the program should review the Accreditation Standards in total for its discipline to ensure that it has maintained compliance in all areas.

<u>Table 2: Report the Program’s Specific Uses of Temporary Flexibility for the Class of 2021 (additional or substantially different changes beyond those previously approved by the Commission or changes in adequate/sufficient patient experiences)</u>	
<u>CODA Request for Information for Class of 2021</u>	<u>Program Response for Class of 2021 Related to Interruption of Education</u> (Document changes beyond the prior CODA-approved temporary flexibility) <i><u>Insert Program Responses In This Column</u></i>
1. Provide an update since the program’s prior submission on the <u>chronology of events/circumstances</u> related to interruption of education for the Class of 2021 and <u>the expected period of interruption of education.</u>	
2. Temporary Modifications to Curriculum: <u>Describe specific temporary modifications to curriculum content, curriculum length, and/or sequence that have occurred and how the modifications will maintain compliance with CODA Accreditation Standards.</u>	<i>Beyond the temporary flexibility previously approved by CODA for the Class of 2020, submit information to identify temporary flexibility used for the Class of 2021 by addressing the following areas:</i> <ul style="list-style-type: none"> ○ Indicate what, if any, curricular content was eliminated or re-sequenced. ○ Indicate what, if any, area of curriculum length (course, rotation, or overall program length) was modified. ○ Describe how the program demonstrates continued compliance with CODA required curriculum content, course sequencing, and curricular length, as applicable ○ Provide as an Exhibit the BEFORE and AFTER overall program course sequence, as applicable. <i>(If the program has applied additional or substantially different temporary flexibility in the area of <u>curriculum content, length or sequence</u>, the program must address all Standards in the discipline-specific temporary flexibility guidance document for the Class of 2021 to describe</i>

	<p><i>temporary flexibility that has been applied. Additional discussion of compliance with other Standards that may be applicable should also be considered).</i></p>
<p>3. Temporary Modifications to Clinical Program:</p> <p><u>Describe specific temporary modifications to the laboratory, preclinical, and/or clinical portion of the program that have occurred and how the modifications will maintain compliance with CODA Accreditation Standards.</u></p>	<p><i>Beyond the temporary flexibility previously approved by CODA for the Class of 2020, submit information to identify temporary flexibility used for the Class of 2021 by addressing the following areas:</i></p> <ul style="list-style-type: none"> ○ Document changes to the laboratory, preclinical, and/or clinical* portion of the program and describe how the program demonstrates continued compliance with CODA Standards related to program and course requirements (i.e., changes in any program, course, or CODA-mandated educational requirements). ○ Document changes and describe how the program demonstrates continued compliance with CODA Accreditation Standards related to new or different evaluation, assessment, and/or grading methods have been employed due to the interruption of education. Describe the specific changes that were made and how the program complies with CODA Accreditation Standards related to assessment of student/resident competence. <p><i>(If the program has applied additional or substantially different temporary flexibility in the area of <u>laboratory, preclinical, and/or clinical portion of the program</u>, the program must address all Standards in the discipline-specific temporary flexibility guidance document for the Class of 2021 to describe temporary flexibility that has been applied. Additional discussion of compliance with other Standards that may be applicable should also be considered).</i></p>
<p>4. Temporary Modifications to Facilities:</p> <p><u>Describe specific temporary modifications to the laboratory, preclinical, and/or clinical facilities used by the program and how the modifications will maintain compliance with CODA Accreditation Standards.</u></p>	<p><i>Beyond the temporary flexibility previously approved by CODA for the Class of 2020, submit information to identify temporary flexibility used for the Class of 2021 by addressing the following areas:</i></p> <ul style="list-style-type: none"> ○ Provide evidence of the facility capacity and student use schedule to ensure continued compliance with CODA Standards. Submit a signed affiliation agreement for the use of temporary facilities. <p><i>(If the program has applied additional or substantially different temporary flexibility in the area of <u>laboratory,</u></i></p>

	<p><i>preclinical, and/or clinical facilities, the program must address all Standards in the discipline-specific temporary flexibility guidance document for the Class of 2021 to describe temporary flexibility that has been applied. Additional discussion of compliance with other Standards that may be applicable should also be considered).</i></p>
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PROVIDE RELEVANT DOCUMENTATION to illustrate how the program will continue to comply with the accreditation standard(s). When deciding how to explain a change and selecting appropriate documentation, it may be helpful to use the following approach:

- a. Description: discuss BEFORE and AFTER the change;
- b. Appraisal and Analysis: assess the IMPACT of the change;
- c. Supportive Documentation: EVIDENCE that the program continues to meet the standards.

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.

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 affected** 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 the institution
 - b. program title;
 - 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 department head/dean;
 - e. name, title, telephone number, e-mail address and signature of the chief executive officer of the 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. If, due to the nature of the interruption of education, the program is unable to obtain administrative signatures, the submission must at a minimum include evidence of distribution of the completed report to the program's institutional administration (e.g. carbon copy on email submission of report).

2. **DOCUMENTATION** – The report must be succinct and provide only the information necessary to fully address the questions noted above. See above related to page limitations.

DEADLINES: The Commission must be notified in writing of an interruption of education as soon as possible following the event, and no more than 30 days following the occurrence.

Because of the above deadlines, program administrators should consult with Commission staff immediately upon experiencing an interruption of education. If the report of interruption of education will be considered by a Review Committee and the Commission, the Commission acknowledgment will indicate the meeting date. Failure to adhere to established deadlines and/or comply with the policy will jeopardize the program's accreditation status.

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. 2/22/19)

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
 - 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 or treatment
 - Mother’s maiden name
 - Taxpayer ID number
 - 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”.