

## **Policy on Complaints Directed at CODA-Accredited Educational Programs**

Students, faculty, constituent dental societies, state boards of dentistry, and other interested parties may submit an appropriate, signed complaint to the Commission on Dental Accreditation (CODA) regarding any CODA-accredited dental, allied dental or advanced dental education program, or a program that has an application for initial accreditation pending. An “appropriate” complaint is one that directly addresses a program’s compliance with the Commission’s standards, policies and procedures. The Commission is interested in the continued improvement and sustained quality of dental and dental-related education programs but does not intervene on behalf of individuals or act as a court of appeal for treatment received by patients or individuals in matters of admission, appointment, promotion or dismissal of faculty, staff or students.

In accord with its responsibilities to determine compliance with accreditation standards and required policies, the Commission does not intervene in complaints as a mediator but maintains, at all times, an investigative role. This investigative approach to complaints does not require that the complainant be identified to the program.

The Commission, upon request, will take every reasonable precaution to prevent the identity of the complainant from being revealed to the program; however, the Commission cannot guarantee the confidentiality of the complainant.

Only written, signed complaints will be considered by the Commission; oral and unsigned complaints will not be considered. The Commission strongly encourages attempts at informal or formal resolution through the program's or sponsoring institution's internal processes prior to initiating a formal complaint with the Commission. The following procedures have been established to manage complaints:

### ***Inquiries:***

When an inquiry about filing a complaint is received by the Commission office, the inquirer is provided a copy of the Commission’s Evaluation Policies and Procedures (EPP) manual (includes the Complaint Policy) and the appropriate Accreditation Standards document.

The initial screening is usually completed within thirty (30) days and is intended to ascertain that the potential complaint relates to a required accreditation procedure (i.e., one contained in Evaluation Policies and Procedures [EPP]) or to one or more accreditation standard(s) or portion of a standard which have been or can be specifically identified by the complainant.

Written correspondence clearly outlines the options available to the individual. It is noted that the burden rests on the complainant to keep his/her identity confidential. If the complainant does not wish to reveal his/her identity to the accredited program, he/she must develop the complaint in such a manner as to prevent the identity from being evident. The complaint must be based on the accreditation standards or required accreditation procedures. Submission of documentation which supports the non-compliance is strongly encouraged.

### ***Written Complaints:***

When a complainant submits a written, signed statement describing the program’s non-compliance with specifically identified procedure(s) or standard(s), along with the appropriate documentation, the following procedure is followed:

1. The materials submitted are entered in the Commission’s database and the program’s file and reviewed by staff.
2. Legal counsel, the chair of the appropriate review committee, and the applicable review committee members may be consulted to assist in determining whether there is sufficient information to proceed.

- a. If the complaint provides sufficient evidence of probable cause of non-compliance with the standards or required accreditation procedures, the complainant is so advised and the complaint is investigated using the procedures in the following section “formal complaints.”
- b. If the complaint does not provide sufficient evidence of probable cause of non-compliance with the standards or required accreditation procedures, the complainant is so advised. The complainant may elect:
  - (1) to revise and submit sufficient information to pursue a formal complaint.
  - (2) not to pursue the complaint. In that event, the decision will be so noted and no further action will be taken.
- c. Initial investigation of a complaint may reveal that the Commission is already aware of the program’s non-compliance and is monitoring the program’s progress to demonstrate compliance. In this case, the complainant is notified that the Commission is currently addressing the non-compliance issues noted in the complaint. The complainant is informed of the program’s accreditation status and how long the program has been given to demonstrate compliance with the Accreditation Standards.

***Formal Complaints:***

Formal complaints (as defined above) are investigated as follows:

3. The complainant is informed in writing of the anticipated review schedule.
4. The Commission informs the chief administrative officer (CAO) of the institution sponsoring the accredited program that the Commission has received information indicating that the program's compliance with specific required accreditation procedure(s) or designated standard(s) has been questioned.
5. Program officials are asked to report on the program’s compliance with the required procedure(s) or standard(s) in question by a specific date, usually within thirty (30) days.
  - a. **For standard(s)-related complaints**, the Commission uses the questions contained in the appropriate sections of the self-study to provide guidance on the compliance issues to be addressed in the report and on any documentation required to demonstrate compliance.
  - b. **For procedure(s)-related complaints**, the Commission provides the program with the appropriate policy or procedural statement from EPP. Additional guidance on how to best demonstrate compliance will be provided to the program. The chair of the appropriate review committee and/or legal counsel may assist in developing this guidance.
6. Receipt of the program’s written compliance report, including documentation, is acknowledged.
7. The appropriate committee(s) and the Commission will investigate the issue(s) raised in the complaint and review the program’s written compliance report at the next regularly scheduled meeting. In the event that waiting until the next meeting would preclude a timely review, the appropriate committee(s) will review the compliance report in a telephone conference call(s). The action recommended by the committee(s) will be forwarded to the Commission for mail ballot approval in this later case.
8. The Commission may act on the compliance question(s) raised by the complaint by:
  - a. determining that the program **continues to comply** with the procedure(s) or standard(s) in question and that no further action is required.

- b. determining that the program ~~does not or~~ **may not continue to comply** with the procedure(s) or standard(s) in question and going on to determine whether the corrective action the program would take to come into full compliance could be (i) documented and reported to the Commission in writing or (ii) would require an on-site review.
    - i. If by written report: The Commission will describe the scope and nature of the problem and set a compliance deadline and submission date for the report and documentation of corrective action taken by the program.
    - ii. If by on-site review: The Commission will describe the scope and nature of the problem and determine, based on the number and seriousness of the identified problem(s), whether the matter can be reviewed at the next regularly scheduled on-site review or whether a special on-site review will be conducted.
      - (1) If a special on-site review is required, the visit will be scheduled and conducted in accord with the Commission's usual procedures for such site visits.
  - c. (1) determining that a program **does not** comply with the procedure(s) or standards(s) in question and changing a fully-operational program's accreditation status to "approval with reporting requirements" and (2) going on to determine whether the corrective action the program would take to come into full compliance could be (i) documented and reported to the Commission in writing or (ii) would require an on-site review.
    - iii. If by written report: The Commission will describe the scope and nature of the problem and set a compliance deadline and submission date for the report and documentation of corrective action taken by the program.
    - iv. If by on-site review: The Commission will describe the scope and nature of the problem and determine, based on the number and seriousness of the identified problem(s), whether the matter can be reviewed at the next regularly scheduled on-site review or whether a special on-site review will be conducted.
      - (2) If a special on-site review is required, the visit will be scheduled and conducted in accord with the Commission's usual procedures for such site visits.
9. Within two weeks of its action on the results of its investigation, the Commission will also:
- a. notify the program of the results of the investigation.
  - b. notify the complainant of the results of the investigation.
  - c. record the action.
10. The compliance of programs applying for initial accreditation is assessed through a combination of written reports and on-site reviews.
- a. When the Commission receives a complaint regarding a program which has an application for initial accreditation pending, the Commission will satisfy itself about all issues of compliance addressed in the complaint as part of its process of granting initial accreditation to the applicant program.
  - b. Complainants will be informed that the Commission does provide developing programs with a reasonable amount of time to come into full compliance with standards that are based on a certain amount of operational experience.

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