



## Commission Actions Policy

### Scope of This Policy

The decision-making body of the Commission on Osteopathic College Accreditation (COCA) is the Commission. It is given the authority to make a range of decisions related to the accredited status of member Colleges of Osteopathic Medicine (COMs), to approve accreditation standards and operational policies, substantive change applications, and other actions related to the COCA's mission. This policy delineates the range of decisions the Commission may make in core categories of action.

The Commission may authorize its Executive Committee (EC) to consider and take action on a range of decisions, such as evaluating progress reports, monitoring reports, or complaints, provided that its decisions are reported to the Commission at its next regularly scheduled meeting. .

### Candidacy Decisions

Following the review of all relevant documentation from a COM seeking Candidate status, the Commission may take one of the following actions:

- **Approve** the request if the Candidate status requirements are **met**. The Commission may also determine that some requirements are **met with monitoring**. This action typically is taken for a new and developing COM, or for an accredited COM seeking expansion, as it recognizes that some aspects of the COM are developing at an appropriate level even as full compliance must be verified at a subsequent time.
- **Defer** the request if the Commission finds that a limited number of Candidate status requirements are not met and is reasonably certain that the applicant may be expected to meet the requirements prior to its next meeting. The Commission will specify the requirements remaining to be met.
- **Deny** the request if the proposed COM fails to meet the Candidate status requirements or fails to make proper application. The Commission will specify which requirements were not met. This is an adverse action and is subject to appeal. (34 C.F.R. § 602.20(e))

Actions to award Candidate status are reported to the US Department of Education and posted on the COCA website. Should the COM elect to post the status on its own website, the statement must comply with the wording included in the Commission's action letter.

### Pre-Accreditation Decisions

Following the review of all relevant documentation from a COM seeking Pre-Accreditation status, the Commission may take one of the following actions:

- **Approve** the request if the Pre-Accreditation status requirements are **met**. The Commission may also determine that some requirements are **met with monitoring**. This action typically is taken for a new and developing COM, or for an accredited COM seeking expansion, as it recognizes that some aspects of the

COM are developing at an appropriate level even as full compliance must be verified at a subsequent time.

- **Defer** the request if the Commission finds that a limited number of Pre-Accreditation status requirements are not met and is reasonably certain that the applicant is likely to meet the requirements prior to its next meeting and within the time period provided by policy. The Commission will specify the requirements remaining to be met.
- **Deny** the request, cite the accreditation standards that have not been met by the COM, and continue Candidate status if the COM fails to meet the Pre-Accreditation status standards but has not exceeded the maximum Candidate status term.
- **Deny** the request, cite the accreditation standards that have not been met by the COM, and withdraw recognition if the COM fails to meet the Pre-Accreditation standards and has met or exceeded the maximum Candidate status term. This is an adverse action and is subject to appeal. (34 C.F.R. § 602.20(e))

Actions to award Pre-Accreditation status are reported to the US Department of Education and posted on the COCA website. Should the COM elect to post the status on its own website, the statement must comply with the wording included in the Commission's action letter.

### **Initial Accreditation Decisions**

A COM that is advancing from Pre-Accreditation status is regarded as seeking Initial Accreditation. Following the review of all relevant documentation from a COM seeking Initial Accreditation status, the Commission may take one of the following actions:

- **Accreditation:** This status indicates that a COM is compliant with all standards. However, there may be unmet non-core elements that must be addressed through progress reports. Initial Accreditation is granted for six years. Monitoring is conducted through submission of the COCA annual report; a mid-cycle report is due in the third year of accreditation.
- **Accreditation With Finding:** This status indicates that a COM is non-compliant with one standard, including non-compliance with one or more core elements within a standard), requiring ongoing monitoring through progress reports, annual reports, and other activities that the Commission deems appropriate. For COMs with this status, accreditation will be granted for five years. Monitoring is conducted through submission of the COCA annual report; a mid-cycle report is due in the third year of accreditation.
- **Accreditation With Monitoring:** This status indicates that a COM is non-compliant with two standards, including non-compliance with one or more core elements within each standard, requiring ongoing monitoring through progress reports, annual reports, and other activities the Commission deems appropriate. For COMs with this status, accreditation will be granted for four years. Monitoring is conducted through submission of the COCA annual report; a mid-cycle report is due in the second year of accreditation.

- **Accreditation With Warning:** This status indicates that a COM is non-compliant with more than three but no more than five standards, including non-compliance with one or more core elements within each standard, and that the COM exhibits weaknesses that threaten the program's quality. Ongoing monitoring will occur via progress reports and any other monitoring the Commission deems appropriate. For schools with this status, accreditation will be granted for two years. The mid-cycle report will be submitted with the annual report. The Commission will specify the unmet accreditation standard(s) and specify the procedures for monitoring compliance.
- **Accreditation With Probation:** This status is granted when a COM is non-compliant with more than five standards, including non-compliance with one or more core elements within each standard, which exhibits serious weaknesses such that the quality of the program is jeopardized. The COCA will specify the unmet accreditation standard(s) and the procedures for monitoring compliance.

Actions to award Initial Accreditation are reported to the US Department of Education and posted on the COCA website. Should the COM elect to post the status on its own website, the statement must comply with the wording included in the Commission's action letter.

A COM determined by the Commission to be out of compliance with any COCA standard is required to bring its operations into full compliance within 24 months of receipt of the decision from the COCA. This time period may be extended only upon petition to the COCA and in keeping with its Extensions for Good Cause Policy.

The COCA does not apply any accreditation actions retroactively. (34 C.F.R. §602.18(b)(6)(i-ii))

### **Reaffirmation of Accreditation Decisions**

Since accreditation by the COCA does not expire but must be reaffirmed, a COM that approaches the end of its designated period of accreditation will apply for Reaffirmation of Accreditation. After review of relevant documentation, the Commission may make one of the following actions:

- **Accreditation With Exceptional Outcome:** This status indicates that a COM is compliant with all standards and meets all elements. For schools with this status, accreditation will be granted for ten years. Monitoring is conducted through submission of the COCA annual report and the mid-cycle report that are due in the fifth year of accreditation. This status is not available to a COM following a status of Accreditation with Probation or Accreditation with Warning.
- **Accreditation:** This status indicates that a COM is compliant with all standards. However, there may be unmet non-core elements that must be addressed through progress reports. For COMs with this status, accreditation will be granted for seven years. Monitoring is conducted through submission of the COCA annual report and the mid-cycle report that are due in the third year of accreditation.
- **Accreditation With Finding:** This status indicates that a COM is non-compliant with one standard, including non-compliance with one or more core elements within a standard, and ongoing monitoring will occur through progress reports,

annual reports, and other monitoring that the Commission deems appropriate. For COMs with this status, accreditation will be granted for five years. A mid-cycle report is due in the third year of accreditation.

- **Accreditation With Monitoring:** This status indicates that a COM is non-compliant with two standards, including non-compliance with one or more core elements within each standard, and ongoing monitoring will occur through progress reports, annual reports, and other monitoring the COCA deems appropriate. For COMs with this status, accreditation will be granted for four years. A mid-cycle report is due in the second year of accreditation.
- **Accreditation With Warning:** This status indicates that a COM is non-compliant with more than three but no more than five standards, including non-compliance with one or more core elements within each standard, and that the COM exhibits weaknesses that threaten the program's quality. Ongoing monitoring will occur via progress reports and any other monitoring the COCA deems appropriate. For schools with this status, accreditation will be granted for two years. The mid-cycle report will be submitted with the annual report. The COCA will specify the unmet accreditation standard(s) and specify the procedures for monitoring compliance.
- **Accreditation With Probation:** This status is granted when a COM is non-compliant with more than five standards, including non-compliance with one or more core elements within each standard, which exhibits serious weaknesses such that the quality of the program is jeopardized. The Commission will specify the unmet accreditation standard(s) and the procedures for monitoring compliance. This status may not exceed two years. A COM with this status must immediately submit a teach-out plan or agreement for approval by the Commission.
- **Order to Show Cause:** This status is awarded when a COM is in imminent danger of becoming destabilized or closing. This status may not exceed one year; it may not be appealed or extended for good cause. A COM with this status must immediately submit a teach-out plan or agreement for approval by the Commission.
- **Withdrawal of Accreditation:** This status indicates that the quality of a COM's educational program is compromised, and the school was unable to come into compliance with all standards within the allotted timeframe. Withdrawal of Accreditation is an adverse action and is subject to appeal. (34 C.F.R. § 602.20(e))

While actions other than Accreditation with Exceptional Outcomes and Accreditation are intended to garner the cooperation of a COM in addressing areas of non-compliance, and while they are listed in increasing levels of severity, they need not be applied progressively. The Commission may apply the action in keeping with its findings.

Actions to award Reaffirmation of Accreditation are reported to the US Department of Education and posted on the COCA website. Should the COM elect to post the status on its own website, the statement must comply with the wording included in the Commission's action letter.

### **Substantive Change Decisions**

Applications for substantive changes, as listed in the *COCA Substantive Change Policies and Procedures* (effective July 1, 2024), are considered by the Commission. Following the review of all relevant documentation, the Commission may take one of the following actions:

- **Approve** the application if all of the requirements related to the specific kind of change have been **met**. The Commission may also determine that some requirements are **met with monitoring**. This action typically is taken for a new and developing COM, or for an accredited COM seeking expansion, as it recognizes that some aspects of the COM are developing at an appropriate level even as full compliance must be verified at a subsequent time. Substantive change requests will be approved when the Commission has determined that the change will not have a material adverse effect on the capacity of the COM to meet its continuing accreditation standards.
- **Defer** action and request additional information or development by the COM of identified structures or processes.
- **Deny** the application, expressing the reasons for its action. In this case, the COM will be required to submit the related substantive change fee with its new application.

### **Additional Commission Decisions**

The Commission is the recognized decision-making body for the following actions:

- Approval of Substantive Change applications in keeping with the COCA Substantive Change Policy;
- Approval of changes to the COCA Standards, following solicitation of public comments and in keeping with the requirements of the COCA Review of Standards Policy;
- Approval of the COCA Policies and Procedures and of any subsequent updates. Solicitation of public comments is not required prior to such actions; and
- Adjudication of complaints regarding a COM following preliminary review by staff and the COCA Executive Committee.

### **Related Federal Requirements:**

34 C.F.R. § 602.18(b)(6)(i-ii); 34 C.F.R. § 602.20(e)