



COCA Procedures Manual

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Introduction

These Procedures govern the implementation of Commission on Osteopathic College Accreditation (COCA) processes and articulate the procedures used to accredit medical education programs granting Doctor of Osteopathic Medicine (DO) degrees. They are issued to provide information to the public and to promote transparency and consistency of decisions made concerning COCA accreditation actions.

Overview of Accreditation

As practiced in the United States today, accreditation is a process by which institutions and programs voluntarily submit to an extensive peer-based evaluation of their compliance with standards for educational quality adopted by member Colleges of Osteopathic Medicine (COMs¹). The higher education community relies on accreditation to ensure quality and to foster a culture of continuous improvement. Accreditation offers a mark of distinction for academic programs and institutions, signaling high quality and a commitment to excellence.

There are two distinct accreditation types in higher education.

- Programmatic, also called specialized or professional accreditation, conducts an in-depth assessment of specialized or professional programs at a college, university, or independent institution, most often with reference to the requirements of a specific profession.
- Institutional accreditation reviews an entire college or university, including the academic and organizational structures of a college or university. In most cases, a programmatic accreditor will accredit a program within an institution holding accreditation by a recognized institutional accreditor.

Through accreditation, the COCA provides assurance to prospective and current osteopathic medical students, the medical profession, healthcare institutions, and the public that a COM's educational program meets standards of rigor and relevance. It also assures that graduates who have earned a DO degree from an accredited COM are prepared for the next stage of their training. The COCA publishes its standards for new and applicant COMs in *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*. For a currently accredited COM seeking reaffirmation of accreditation, standards are published in *Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards*. Current versions are available electronically on the COCA website (www.aoacoca.org).

Scope of Recognition

The Commission on Osteopathic College Accreditation (COCA), a unit of the American Osteopathic Association, is the only accrediting agency for pre-doctoral osteopathic medical education leading to the DO degree and is recognized as such by the United States Department of Education (USDE). While the COCA is recognized at this time as both an institutional accrediting agency for freestanding colleges of osteopathic medicine

¹ Throughout this manual, COM includes reference to programs that use the term School of Osteopathic Medicine.

(COMs) and a programmatic accrediting agency for COMs that exist within a parent entity that holds institutional accreditation, effective March 1, 2024, the COCA no longer accepts applications to serve as the institutional accreditor for a new COM.

The COCA's scope of recognition, as granted by the USDE under 34 CFR §602.3, is the accreditation and Pre-Accreditation of programs of osteopathic medicine leading to the award of the degree of Doctor of Osteopathy or Doctor of Osteopathic Medicine (DO) throughout the United States.

Commission Membership

The decision-making body of the COCA is referred to as the Commission. It is comprised of 21 members, as follows:

Nine members directly involved in osteopathic medical education, including:

- Four COM Deans

- Two graduate medical education leaders

- One biomedical science faculty member at a COM who is not a Dean/Chief Academic Officer (CAO)

- One clinical science faculty member at a COM who is not a Dean/CAO

- One student services representative at a COM

Two student members

- One student nominated by the Student Osteopathic Medical Association (SOMA)

- One student nominated by the Council of Osteopathic Student Government Presidents (COSGP)

Ten additional members:

- Four osteopathic physicians at large

- Three public members

- One physician member of a state medical licensing board

- One hospital or health care administrator with experience in clinical medical education

- One DO resident or fellow or new physician in practice

The Executive Committee (EC) of the Commission is comprised of the Chair, Vice Chair, Immediate Past Chair of the Commission, and the chairs of the standing committees – the Standards Review Committee (SRC), the Data Reports Committee (DRC) and the Committee on College Accreditation Training (CCAT).

Commissioner Orientation

Prior to serving on the Commission, new Commissioners are supplied with current standards, policy and procedure documents, handbooks, and manuals. They also undergo training that focuses on decision-focused outcomes and document review competencies that COCA members will be expected to employ. In addition, all Commissioners are

expected to attend orientation sessions and webinars conducted by the COCA staff for site visit team members and colleges of osteopathic medicine.

The COCA provides annual presentations at appropriate conferences where stakeholders are typically present, such as those held by the American Association of Colleges of Osteopathic Medicine (AACOM) and the AOA, to provide accreditation updates and standards compliance education to ensure that COMs are informed regarding the COCA's review processes and standards.

Meetings

The Commission meets in regular session four times each year – in April, June, August, and December, and may meet via teleconference as appropriate. All meetings, together with their topical agendas, are announced on the COCA website at <http://www.aoacoca.org>. Deliberations leading to accreditation decisions, including review of progress reports, substantive change applications, and other accreditation actions, occur in closed session.

COCA members may participate in regular or special meetings via any means of communication that allows all participants to simultaneously communicate with each other, such as teleconference or video conference. Any COCA member participating in a meeting by such means will be deemed present in person at such meeting.

Formal action may be taken without an in-person meeting by mail, electronic mail ballot, or other asynchronous communications medium provided that such actions have the affirmative votes of all COCA members. The Chair and Vice Chair, in consultation with the COCA staff, may call a special meeting to deal with any issues that they determine cannot wait until the next regularly scheduled meeting. The Commission also reserves the right to delegate certain decisions to the EC provided any such actions are placed on the agenda for consideration at the next meeting of the full Commission.

All Commission meetings are guided by the current edition of *Robert's Rules of Order* on all matters not otherwise addressed in this Manual. A quorum shall consist of a simple majority of the Commission's voting members.

Observers

Requests to observe a closed Commission session must be made in writing to the COCA Secretary and require prior approval by the COCA Executive Committee (EC). Observers must agree in writing to hold all meeting materials and results of discussions in strict confidence.

Commission Accreditation Actions

Following the review of all relevant information, the Commission (or with the its approval, the EC) may determine a COM's compliance with COCA standards as follows:

Met: A finding of "met" indicates that all requirements of the element or standard are met. No further action is required.

Not Met: A finding of "not met" indicates that the COM is non-compliant with the requirements of the element or standard. Upon a finding of "not met," the COCA will

require a progress report to be submitted for review at a future meeting of the COCA or the EC. Communications to the COM of this action include each requirement necessary to bring the element into compliance as reported to the Commission through a progress report. The Commission will specify a submission due date for its review, which can be no more than 24 months following the communication of non-compliance.

Met With Monitoring: This finding is primarily used for new and developing COMs or for COMs under a substantive change for a branch campus or additional location. Elements found to be “met with monitoring” are determined to be met based on the information available at the time of the review but require additional assessment to ensure that the COM is in full compliance with the requirements as it continues to develop. Elements and standards found to be “met with monitoring” are considered met when determining a COM’s accreditation status. Monitoring will end when the Commission or the EC determines that the COM is in full compliance.

Deferred Decision: The COCA may defer a decision on compliance and request that the COM submit additional written information for the Commission’s or the EC’s review at a future meeting.

Confidentiality of Information Collected During the Accreditation Process

Accreditation information is submitted to, or generated by, the COCA with the expectation of confidentiality. This provides for a higher level of candor in describing the actual condition of a COM in relation to COCA standards. All information collected from the COMs is held in strict confidence by the COCA staff, commissioners, and evaluators. Unauthorized disclosure of information that reflects the views of a visiting team or of the Commission concerning a COM’s accreditation status is prohibited.

COM Directory

The COCA publishes on its website a current list of COMs holding Pre-Accreditation or Accreditation status. Each listing includes the following information: name, address, phone number, and web site of the COM; name and title of the Dean; date the COM was granted Pre-Accreditation status (“established date”); year of last accreditation site visit; year of next accreditation site visit; and accreditation status. A separate list is published containing the names of proposed COMs in Candidate status. The COCA does not announce the names of COMs in Applicant status.

Interpretation of Standards

As an aspect of its accreditation review, a COM submits a self-study that includes a narrative and supporting documentation to establish its compliance with COCA’s standards. The COCA empowers a trained team of evaluators to conduct an onsite visit to verify the assertions of the COM’s report. The findings from a site visit report are considered as definitive evidence of a COM’s compliance with a standard of accreditation. Based on the team’s report, and from the perspective of multiple accreditation decisions, the final interpretation of compliance rests with the Commission’s collective judgment.

Publishing of Accreditation Actions

A COM retains the right to publicize its accreditation reports and the site team's report for an accreditation review. If a COM releases a report in a manner that misrepresents or distorts the Commission's action, the COCA may release information to correct the misrepresentation. The COCA will inform the COM in advance of the release.

If the COM elects to publicly disclose its Candidate, Pre-Accreditation, or Accreditation status, it must state the following on its website:

The college has received [Candidate, Pre-Accreditation, or Accreditation] status from the Commission on Osteopathic College Accreditation, which is the recognized accrediting agency for the approval of colleges and programs leading to the Doctor of Osteopathic Medicine (DO) degree. The address and phone number of the accrediting agency are: Commission on Osteopathic College Accreditation, American Osteopathic Association, 142 East Ontario Street, Chicago, IL 60611. Telephone: (312) 202-8124; Fax: (312) 202-8424; Email: predoc@osteopathic.org.

Reporting Accreditation Actions

To Institutions

Within 30 days of any final Commission action taken on the reports of comprehensive or focused visits, the COCA staff will send a final action letter conveying the Commission's action to the COM's dean or equivalent position. The letter includes the COM's accreditation status, the Commission's findings regarding the program's compliance with accreditation standards and related elements, any required follow-up, and the dates by which compliance must be demonstrated. The COCA does not publish this letter, but the COM may disclose it at its discretion.

To External Groups and the Public

Within 30 days of its meeting the COCA will submit required notifications to the Secretary of Education, the relevant state medical licensing boards, the relevant institutional accreditation bodies, and the public about actions taken affecting a COM's accreditation, including the decision to award Pre-Accreditation or Initial Accreditation or to reaffirm a COM's accreditation status.

For actions subject to a request for reconsideration or for an appeal of an adverse action, the COCA will make these same notifications within 30 days of when the decision becomes final and at the same time as when the COM is notified. Accreditation decisions will be conveyed to the public by posting the accreditation action on the COCA website within 24 hours of notifying the COM.

In decisions to deny or withdraw accreditation, the COCA will provide the Secretary of Education, the relevant state medical licensing boards, the relevant institutional accrediting bodies, and the public with a summary of the facts of its review no later than 30 days after the decision is finalized along with any comments made by the program or with a statement that the program has been offered the opportunity to comment. The COCA website will also reflect that the program has been offered the opportunity to provide comments.

If an accredited program withdraws its accreditation status voluntarily or otherwise allows its accreditation status to lapse, the COCA staff will inform the Secretary of the Education, the relevant institutional accrediting bodies, and the relevant state licensing agencies within 30 days of the withdrawal or lapse date.

The accreditation information posted on the COCA's website includes the current accreditation status of an accredited program and the date and type of its next accreditation survey, if it has been set, but does not include site visit team reports, correspondence with or documentation submitted by a program in connection with its accreditation status, nor the basis for COCA's actions.

If a COM publicly discloses its accreditation status, it must disclose the status accurately. Any incorrect or misleading statements must be corrected immediately. Failure to promptly correct or clarify the information may result in reconsideration of the COM's accreditation status. The COM's public information must also include the COCA's contact information.

Third-Party Comments

The COCA provides opportunity for third-party comment about COMs undergoing review for Candidate, Pre-Accreditation, Initial Accreditation or reaffirmation of accreditation status. The COCA also provides opportunity for third-party comments on substantive change or teach-out agreement requests. Notice of an opportunity to submit third-party comment is provided with the COCA meeting's announcements on the COCA website at www.aoacoca.org. The COCA includes on its website the academic year in which such review will occur along with the process by which third-party comment may be submitted. Comments must be focused on potential areas of non-compliance with accreditation standards or elements.

Third-party comments must be submitted in writing or via email at least 30 days prior to the Commission meeting at which the COM's accreditation status is scheduled for consideration. Employees and students of the COM under consideration may not submit third-party comment, as they will have other opportunities to share their perspectives as part of the review process. While the comment document must identify the commenter, the COCA will keep an individual's identity confidential. The COM will be notified of any third-party comment so that it has an opportunity to comment.

Accreditation Process

The COCA's review for a program seeking any accreditation status begins with the COM submitting a self-study report demonstrating compliance with applicable COCA standards. When required, COCA evaluators will conduct an on-site review and submit a site visit report to the Commission. Two Commission members are assigned to review the self-study report, the site visit report, and any additional documentation submitted to present to the Commission for deliberation.

The Self-Study

The primary purpose of the COM's self-evaluation activity and resulting report is to enable a COM to gain a candid and comprehensive view of its current status and to set in motion a data-supported plan for continuous improvement, consistent with both the COM's

mission and the COCA's standards and policies. Self-appraisal involves a collaborative process with all areas of the COM to identify its strengths and weaknesses. The COM can then use the self-assessment process and its results as tools for continuous, on-going assessment and improvement. It is expected that the resulting report is forthcoming, with no intent to shield reviewers from discerning a COM's strengths and its opportunities for improvement.

The COM's self-study report is submitted via the COCA electronic accreditation system at least 90 days prior to the scheduled on-site visit or the COCA meeting at which the COCA will address the self-study report if no site visit is required. A COM's access to COCA's electronic accreditation system to upload the self-study report is granted by accreditation staff at predoc@osteopathic.org.

Materials for Commission Meetings

To ensure that Commissioners have sufficient, complete, and relevant information to inform their decisions, COCA staff review a COM's self-study reports and related information to verify that they are complete prior to submitting them to the Commission for review. Staff verify that materials have a complete response for each of the submission requirements. If staff determine that materials are incomplete, they will confer with the program personnel to request clarifying information. The Vice President of Accreditation or the COCA Secretary may determine whether to delay a Commission action based on inadequate information. In such cases, the COM will be notified and a new date set at a subsequent Commission session and the COCA EC will be notified.

Comprehensive Site Visits

The COCA staff contact a COM approximately twelve months prior to the anticipated accreditation visit date to establish specific dates for the on-site review. A comprehensive site visit typically requires two to three days on site to complete. Staff considers several criteria when selecting team members, including area of expertise, availability, geographical location, conflict of interest, and level of experience. Team members are multi-faceted individuals who have broad knowledge and experience in higher education, including COM administration, with expertise in one or more of the following areas and as identified by the USDE (see §602.15(a)):

- Administrative personnel
- Educators
- Academic personnel
- Osteopathic medical practitioners.

The site visit team will also include a COCA staff member to serve as a team secretary to coordinate site visit activities between the COM and the site visit team. The COM will have an opportunity to review the proposed site visit team and request a change in personnel if a conflict of interest is suspected. The COCA Secretary will determine whether to permit a change in site visit personnel.

A site visit team may also include an evaluator trainee when appropriate and/or an observer. Observers may accompany site visit teams upon formal request to and approval

by the COCA Secretary. Observers will confirm compliance with COCA's conflict of interest policy. Observers from the USDE, and those who represent federal or state agencies or organizations that may have a legitimate accreditation responsibility, may also accompany on-site visit teams. Each observer's respective organization will cover costs incurred by the observer.

Focused Site Visits

A focused site visit may be required by the COCA as part of the COCA's monitoring activities; on the basis of issues found in an accreditation report, complaint, progress report; or site visit which has determined that a standard was not adequately addressed, as the Commission deems necessary. A focused site visit typically requires one to two days on site and will focus on specific standards and elements as determined by the Commission. However, if the team identifies critical information pertinent to other standards and elements while on site, the team may document these observations in its report for the Commission's further review.

Process for Becoming Accredited

Applicant Status

Applicant status is the initial step in seeking Accreditation. This status does not have Accreditation rights or privileges and does not establish or imply the COCA's recognition. Applicant status is granted upon the formal request, via the Applicant Status Form, as submitted by the Chief Executive Officer of the applicant COM. This form is reviewed for completeness by COCA staff, following which the formal Accreditation process is initiated.

Candidate Status

Candidate status is the second step in seeking Accreditation by an applicant COM and is conferred with the privilege of the COCA's recognition, which is posted on the COCA website. Candidate status may be granted to COMs that are in compliance with all required standards and elements published in the *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards* demonstrating the planning and resources necessary to proceed to Pre-Accreditation status within two years.

Upon receiving a completed candidate self-study report, the COCA staff will review the documents to determine whether the materials are complete. This review verifies that a site visit team could find evidence on site that corroborates the contents of the self-study report. Staff will also verify that the required escrowed teach-out and operating reserve accounts are funded. The review of the self-study report will be conducted within 90 days of receiving the materials from the COM. The Commission may request additional information before issuing a decision on Candidate status.

Upon receiving the Candidate status application from a proposed COM in Applicant status, the Commission may:

- Approve the application if the Candidate status requirements are met
- Defer the application if the Commission finds that a limited number of requirements are not met and if it believes that the applicant may be expected to meet the requirements by the time of its next meeting

- Deny the request if the proposed COM fails to meet the requirements or fails to make a proper application. In the event of an adverse decision, the COCA will specify which requirements were not met.

A COM with Candidate status is not authorized to:

- Recruit students in any manner, including by solicitation
- Solicit or collect application fees
- Collect application information, including academic transcripts, Medical College Admissions Test (MCAT) scores, and recommendation letters
- Initiate the admission review process
- Schedule interviews for any potential applicants
- Offer advice on financial aid
- Issue admission letters for the COM
- Offer instruction

The COCA will review a COM's Candidate status annually through written reports submitted by the COM until the COM achieves Pre-Accreditation status. If the COM is unable to proceed to Pre-Accreditation status within 24 months of achieving Candidate status, the Commission will withdraw its Candidate status. In this event, the COM must file a new application along with a new Candidate self-study report and submit a new application fee.

Pre-Accreditation Status

The COCA may grant Pre-Accreditation status to a COM that has achieved Candidate status and meets the Pre-Accreditation status standards published in the *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*. A Candidate COM must submit a Pre-Accreditation self-study report and undergo a Pre-Accreditation comprehensive site visit to demonstrate that it meets the standards.

Timetable to Achieve Pre-Accreditation

A COM may submit the Pre-Accreditation self-study report at any time after it receives Candidate status. However, the Pre-Accreditation self-study report must be submitted at least 18 months prior to the COM's intended opening date and 90 days before the Commission meeting at which it will review the self-study report. This schedule will permit a timely progression for the COM to matriculate its inaugural class.

Pre-Accreditation Site Visit

Upon receipt of a completed Pre-Accreditation self-study report, the COCA staff will review the documents to determine whether the materials are complete and could support an informed review by both the site team and the Commission. The Pre-Accreditation self-study is then reviewed by the Commission for review. Upon approval by the Commission, a Pre-Accreditation site visit is conducted to verify the accuracy of the COM's report. This site visit will occur within 60 to 90 days of the Commission's approval of the COM's report.

Following receipt of the site visit team's report, the Commission will consider the application for Pre-Accreditation status at its next regularly scheduled meeting.

Pre-Accreditation Decisions

After a COM with Candidate status applies for Pre-Accreditation status, the Commission may take one of the following actions:

- Approve the proposed COM to advance to Pre-Accreditation status if the COM meets the status standards
- Defer the decision if the Commission finds that that the COM does not meet a limited number of requirements and if it believes that the applicant may meet the remaining requirements by the next Commission or EC meeting
- 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 time limits
- 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 Accreditation standards and has met or exceeded the maximum candidate status time limits

Activities Allowed During Pre-Accreditation

Upon receiving Pre-Accreditation status, the COM is authorized to solicit applications, collect tuition and fees, admit students, offer instruction within the approved osteopathic medical curriculum, and announce its Pre-Accreditation status. Pre-Accreditation status may not be designated as Accreditation status until the COM has received Accreditation status from the COCA.

Pursuant to 34 CFR §602.16(a)(2), a COM may not hold Pre-Accreditation status for more than five years. For this reason, Pre-Accreditation status will be awarded and become effective no earlier than July 1 of the calendar year prior to the matriculation of the first class of students. If the Commission makes a decision to award Pre-Accreditation status at a meeting that occurs prior to the effective date specified above, Candidate status will remain until the effective date of Pre-Accreditation status. During this interim period, the COM's Candidate status will be stated as "Candidate status with permission to recruit but not to admit students or offer instruction."

Review of Pre-Accreditation Status

The COCA will annually review the COM's Pre-Accreditation status via submitted written reports until the COM achieves Initial Accreditation status. An on-site visit will occur during the first and fourth years of class offerings. Upon review for renewal of Pre-Accreditation status following these reviews, the Commission will either:

- Approve the request for a renewal period of one year if the COM is clearly meeting the Accreditation standards; or
- Deny the request and deny Pre-Accreditation status, citing the unmet Accreditation standards; such termination will be published within 30 days of

final action.

If the COM is unable to proceed to Initial Accreditation status within five years of achieving Pre-Accreditation status, Pre-Accreditation status will be withdrawn, and the teach-out plan or agreement will be implemented.

Timetable to Achieve Initial Accreditation

COMs holding Pre-Accreditation status will undergo a comprehensive site visit in the first and fourth years of matriculation. Pre-Accreditation status will expire after the COCA grants Initial Accreditation status to the COM or five years after the date that the COM received Pre-Accreditation status if the COM has not yet advanced to Initial Accreditation status.

Upon the review for Initial Accreditation status, the Commission will either:

- Award Initial Accreditation status if the COM meets the Accreditation standards; the Accreditation date will be established as the first business day following the Commission meeting at which the decision is made; or
- Terminate Pre-Accreditation status if the COM does not meet the Accreditation standards; such termination will be published within 30 days of final action. This is considered an adverse action and is appealable.

Accreditation Status

Accreditation status is the highest level of Accreditation awarded, and it confers all rights and privileges of Accreditation. Accreditation does not expire; it is periodically reaffirmed through comprehensive reviews. Once accredited, an educational program remains accredited until the program either voluntarily terminates its status or until the Commission acts to terminate the program's Accreditation status through a formal action.

Upon review of relevant information, the Commission may grant the COM one of the following statuses following a review for reaffirmation of Accreditation:

Accreditation With Exceptional Outcome: This status indicates that a COM is compliant with all standards and meets all elements. The COM will be awarded Accreditation for ten years. Monitoring is conducted through submission of the COCA annual report and the mid-cycle report, which is due in the fifth year of Accreditation. This status is not available to COMs granted Initial Accreditation as they progress from Pre-Accreditation status, nor is it available following an Accreditation 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, which is due in the third year of Accreditation. COMs with all elements met achieving Initial Accreditation following Pre-Accreditation status will receive this status for six years with a mid-cycle report 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. For COMs with this status, Accreditation will be granted for five years, with ongoing monitoring occurring through progress reports, annual reports, and other monitoring that the Commission deems appropriate. 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. For COMs with this status, Accreditation will be granted for four years, with ongoing monitoring occurring through progress reports, annual reports, and other monitoring the Commission deems appropriate. 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 significant weaknesses that threaten the total program's quality. For schools with this status, Accreditation will be granted for two years. Ongoing monitoring will occur via progress reports and any other monitoring the Commission deems appropriate. 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. The COCA and the COM will publicly describe the COM's status as Accreditation with Warning. For a COM with this status, failure to bring all standards and elements into compliance within 24 months may result in an action to withdraw Accreditation. The Commission may elect to extend this beyond the period of two years in keeping with its Extension for Good Cause Policy. The COCA will determine the extension period, but it must not exceed twelve months.

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, or when the COM exhibits serious weaknesses in meeting the Accreditation standards such that the quality of the total program is jeopardized. The Commission will specify the unmet Accreditation standard(s) and the procedures for monitoring compliance. Accreditation with Probation status is public, and the COCA will notify all interested parties, including the USDE. The COCA and COM will publicly describe the COM's status as Accreditation with Probation.

Failure to bring standards into compliance within twelve months and the elements into compliance within 24 months may result in Accreditation withdrawal. The Commission may elect to extend this beyond the period of two years in keeping with its Extension for Good Cause Policy. The COCA will determine the extension period, but it must not exceed twelve months.

Issue an Order to Show Cause

At any time while a COM has Accreditation with Warning or Accreditation with Probation status, the COCA may require the COM to show cause as to why Accreditation should not be withdrawn. Under this status, the responsibility rests with the COM to demonstrate why its Accreditation should not be withdrawn. The COCA will state in writing its reasons for taking this action. The COM will have 30 days to respond. The COCA will take action on the COM's response within 30 days of its receipt.

Withdrawal of Accreditation: This status indicates that the quality of a COM's educational program is compromised, that a COM has failed to adequately respond to earlier Commission actions and was unable to come into compliance with all standards within the allotted timeframe. This is an adverse action and subject to appeal in keeping with COCA Appeal of Adverse Action Policy and reported to the USDE and other agencies, as required.

Change in Accreditation Status

Upon demonstration of compliance and the request of a COM, and with a majority vote, the Commission may elect to change an Accreditation status of a COM holding Accreditation with Finding or Accreditation with Monitoring status to the status of Accreditation. In this case, only the status title will change; the timeline to the next comprehensive review will remain the same.

Monitoring through Annual Data and Mid-Cycle Update Reports

The principal purpose of the annual report and the mid-cycle report review is to ensure continued compliance with key indicators and to determine whether there are signals that the Commission should engage in further investigations into whether a COM remains in compliance with the standards and elements. Such investigation may consist of any one or more of the following:

- Request for additional written information
- Request for COM representatives to appear before the Commission
- Require a focused site visit as directed by the Commission
- Order a reduction in approved class size as defined by the Commission.

Failure to submit the annual report or the mid-cycle report by the due date may jeopardize the COM's Accreditation status.

Annual Report

The following information is collected from colleges of osteopathic medicine (COMs) each year through online reporting:

Class Size. Class size data as of September 1 of the current academic year is collected for all campus locations. COMs found to have a first-year matriculated class size over the COCA-approved class size plus eight percent (8%) will be contacted for additional information. If warranted, the COCA may initiate a Substantive Change, Unplanned Class Size Increase (see substantive change policies).

Reported class sizes over the COCA-approved class size, plus eight percent (8%), in subsequent years may result in further investigation to ensure the COM has sufficient facilities, faculty, and other resources to effectively deliver its curriculum.

Cohort Graduation Rate. COMs will report four, five, and six -year graduation rates for each cohort of students.

GME Placement Rate. COMs will report GME placement data for the most recent graduates including the number of graduating students and the number placed into a PGY-1 residency. COMs with a GME placement rate of 95% or less (of students seeking GME) will be notified according to the COCA's COMLEX-USA and GME Placement Rate Review Policies

COMLEX-USA Pass Rate. The COCA receives pass rate data on all three levels of COMLEX-USA annually through an agreement with the National Board of Osteopathic Medical Examiners (NBOME). COMs with first-time pass rates in any one section of the COMLEX-USA exam two years in a row, or in two sections of the COMLEX-USA exam in the same year, that is more than two standard deviations below the mean of all the pass rates and the pass rate is less than 90% will be notified according to the COCA's COMLEX-USA and GME Placement Rate Review Policies.

Monitoring through a Progress Report

A progress report may be requested when any standards are determined not to be met. The progress report must be submitted by the due date listed in the Final Action Letter. The Commission, or the EC if the Commission grants such a review, will review progress reports at the Commission/EC's next regularly scheduled meeting and determine whether the requirements are "met;" or "not met." The COCA will document any requirements for further progress reports. The Commission may also determine if a focused site visit needs to be conducted in lieu of another progress report.

Notifications to the COCA

A COM must notify the COCA within five business days of any change in the following:

- Dean and/or Chief Academic Officer;
 - A change in the dean during Candidate status requires re-initiating the Candidate status application process.
 - A change of dean during Pre-Accreditation status, until graduation of the first class of students, requires a comprehensive visit to occur not less than six months after notification that the dean has changed.
- Decrease in resources available to the COM for its education program, including faculty, physical facilities, or finances, that would adversely affect the delivery of the curriculum; or
- Anticipated change in affiliation agreements affecting ten percent or more of the clinical education rotations.

Accreditation Costs, Dues, and Fees

COCA Accreditation dues and fees are set by the AOA Board of Trustees upon recommendation from the Commission and Accreditation staff. Application and substantive change fees are due upon submitting the related application. Annual dues are billed to each COM in December. The current Dues and Fees Schedule is available upon request to COCA staff.

The direct cost of all site visits is charged to each COM. These costs include the visiting team's transportation, housing, meals, honoraria, and related charges. These costs are aggregated following a visit and invoiced to the COM. The program being evaluated is responsible for transporting the site visit team to and from the team's hotel, for arranging site visit team meals during the day, and for arranging and funding any transportation to affiliated hospitals and regional campuses. The COM is not responsible for costs for trainees or observers that may participate in a site visit.

Records for Commission Decision Making

The Commission requires and relies upon these records to inform its Accreditation decisions:

- Self-study report and supplemental documents submitted by the COM
- Student survey, conducted by the COM and reviewed by its dean of CAO
- Additional needed information identified by the staff or site visit team
- Site visit report submitted by the site visit team chair
- Previous Accreditation decisions and longitudinal tracking of non-compliant standards and elements
- Factual corrections and supporting documents submitted by the COM
- Third-party comment
- Commissioner's review of these documents, completed by two reviewers
- COCA staff review to ensure completeness of institutional information

All Commissioners receive all the above documents for decision making regarding a COM's Accreditation status.

Progress Reports and Compliance Monitoring

A COM must submit its progress report at least 60 days before the Commission meeting at which it will be reviewed. The Commission's information for evaluating a progress report consists of the following:

- Progress report and supplemental documents submitted by the COM
- Previous Accreditation decisions and longitudinal tracking of non-compliant standards and elements
- Commissioner review

- COCA staff review

All commissioners receive all the above documents for decision making regarding a COM's Accreditation status.

Requests for Substantive Change

Policies and procedures detailing requests for substantive change are contained in *Substantive Change Policies and Procedures* posted on the COCA website. The Commission's documentation in support of decisions regarding substantive change applications consists of the following:

- Self-study report and supplemental documents submitted by the COM
- Site visit report, if applicable, submitted by the site visit team chair
- Factual corrections and supporting documents submitted by the COM
- Third-party comment
- COCA commissioner review, completed by two reviewers
- COCA staff review

All commissioners receive all the above documents for decision making regarding a COM's Accreditation status.

Request for Reconsideration

A COM may request reconsideration of a Commission decision other than an adverse action in keeping with the COCA Request for Reconsideration of a Decision Policy.

Appeal of An Adverse Action

An adverse action is defined by the COCA as the denial of Candidacy or Pre-Accreditation or the withdrawal of Pre-Accreditation or Accreditation. A COM may appeal an adverse action in keeping with the COCA Appeal of Adverse Action Policy.

Complaint Review Procedures

Persons associated with a COM and members of the public may submit a complaint about a COM or about the COCA in keeping with the COCA Complaint Policy.

Escrowed Teach-Out Reserve Fund

A proposed COM seeking Candidate status must demonstrate compliance with Candidate Element 3.3: Escrow Reserve Funds. The purpose of the fund is to ensure that, should a new COM fail to achieve Accreditation status within the five year time limit, or otherwise fail to offer its educational program to enrolled students, the COM will have sufficient resources to teach out these students. In this case, the Commission would require a teach-out in keeping with the COCA Teach-out Plans and Agreement Policy. The escrowed funds must be held until Accreditation status is achieved and upon graduation of the first class of students.

Operating Reserve Fund

A proposed COM seeking Candidate status must demonstrate compliance with Candidate

Element 3.4: Operating Reserve Fund. The reserve funds must be held until Accreditation status is achieved and until the first class of students graduates. The COCA may authorize use of this fund for operations, equipment, or construction costs. If the COCA grants such use, then the minimum value of this fund must be re-attained at the end of the fiscal year in which the operating reserve fund is reduced below its required minimum value.

Reporting Requirements

The COCA is responsible for reporting its Accreditation decisions to the U.S. Department of Education (USDE). These reports are detailed in the COCA Notifications to the USDE Policy.

Distance Education

Though the USDE gives accrediting agencies the authority to accredit programs offered solely by distance education, the COCA does not accredit online medical school programs. The COCA believes that the science and art of osteopathic medicine must be gained by direct, in-person and hands-on interaction with instructors and clinical education supervisors. For this reason, the COCA does not accredit programs offered solely by distance education as defined at 34 CFR §602.3.

Respect for Actions of Other Agencies Policy

The COCA conducts its quality assurance activities in collaboration with other agencies in the higher education sector and, as such, shares its decisions with, and receives information from, these other entities as defined in the COCA Respect for Actions of Other Agencies Policy.

Title IV Responsibilities

At the present time, the COCA serves as the institutional accreditor for a limited number of free-standing COMs. For these institutions, the COCA is required to document the performance of its students and graduates relative to Title IV cohort default rates based on the most recent data provided by the Secretary of the USDE. In addition, the COCA requires the COM to document compliance with all necessary responsibilities under Title IV of the 1965 Higher Education Act as most recently amended, and the resulting regulations issued by the Secretary of the USDE at 34 CFR §602, 34 CFR §667, 34 CFR §668, and other enabling regulations.