



COCA Policies and Procedures Manual

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Introduction

These procedures govern the implementation of Commission on Osteopathic College Accreditation (COCA) processes and outline the procedures used to accredit medical education programs that grant Doctor of Osteopathic Medicine (DO) degrees. They are issued to provide information to the public and, in conjunction with the *Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards* and the *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*, promote transparency and consistency of decisions made concerning COCA accreditation actions.

For the purposes of this document, references to the “U.S. Department of Education” shall be construed to include actions or decisions of, and notifications to, the “Secretary of Education.” The term “College of Osteopathic Medicine” also refers to a “School of Osteopathic Medicine.”

About the Commission

The following information serves as a brief introduction to the COCA. COCA functions are outlined in the *COCA Handbook*, available on the COCA website.

Organizational Relationship between COCA and AOA

The COCA's decision-making process is separate and independent from any control or influence by the American Osteopathic Association (AOA). The AOA plays no role in making or ratifying the COCA's accrediting or policy decisions; the COCA has sufficient budgetary and administrative autonomy to carry out its accrediting functions independently; and the COCA provides to the AOA only information it makes available to the public.

COCA Membership

Related Federal Requirement: 34 C.F.R. § 602.15(a)(3)

The COCA's decision-making body is called the Commission. It is comprised of individuals with the following expertise:

- **Administrative personnel:** An Individual currently or recently directly engaged in a significant manner in a postsecondary program or institutional administration (e.g., academic dean, administrative operations, academic affairs, registration, and financial aid/services).
- **Educator:** An Individual currently or recently directly engaged in a significant manner in postsecondary education in an osteopathic medical education program (e.g., professor, instructor, academic dean).
- **Academic personnel:** An individual currently or recently directly engaged in a significant manner in postsecondary teaching and research (e.g., professor, instructor, academic dean).
- **Osteopathic medical practitioners:** An osteopathic physician, currently or recently directly engaged in a significant manner in the practice of osteopathic medicine.
- **Public Member:** An individual who, by education, experience, and public service, possesses qualifications that allow them to provide a public perspective to the assessment of osteopathic medical education program quality.

The Commission has 21 members:

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

COCA Committees

Standing committees of the COCA are defined in the *COCA Handbook*.

COCA Executive Committee

The Executive Committee of the Commission (COCA EC) 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).

The purpose of the COCA EC is to function in well-defined, limited roles between regularly scheduled meetings of the COCA. The COCA EC will provide, among other functions, the following:

- a) Review of COCA documents, to provide recommendations to the COCA for consideration of areas for revision;
- b) Technical review of substantive change applications;
- c) Technical review of applications for new COMs;
- d) Review of continuing compliance monitoring reports;
- e) Authorization of focused site visits based upon information obtained between regularly scheduled meetings;
- f) Standards interpretation;
- g) Adjudicate COM requests for reconsideration; and
- h) Review complaints.

The COCA EC may not make determinations of compliance or accreditation decisions.

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, along with their agendas, are posted on the COCA website at <http://www.aoacoca.org>. The COCA reviews accreditation applications and site visit reports at its April, August, and December meetings. The June meeting is generally reserved for other COCA business and to address urgent issues.

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 communicate simultaneously, such as a 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 address any issues they determine cannot wait until the next regularly scheduled meeting. The Commission also reserves the right to delegate certain decisions to the COCA 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 keep all meeting materials and discussion results strictly confidential.

Use of Artificial Intelligence in COCA Business

No COCA-owned data or information, including COCA Standards, policies, or forms, or any materials submitted by an external party as part of an accreditation application, self-study, site visit, or related process, may be submitted (copied, typed, uploaded, or otherwise entered) into an artificial intelligence (AI) platform without the permission of the COCA. AI note-taking platforms may not be used during any internal or external COCA meeting, whether in-person or virtual, without prior permission from the COCA. COCA Commissioners and evaluators are prohibited from using AI to generate, summarize, analyze, interpret, or draft any portion of accreditation reviews, evaluations, site visit reports, or related materials. This policy does not apply to software used solely for checking grammar or spelling.

Conflict of Interest Policy

Related Federal Requirements: 34 C.F.R. § 602.15(a)(6)

Definitions

A conflict of interest arises whenever an individual may be influenced, or perceived to be influenced, in their decision-making process due to a relationship the individual has with the entity or issue under

consideration. Some examples of situations that could create conflicts of interest include:

- A business or financial relationship with an individual or program under consideration;
- A direct familial relationship with an individual or an officer of an entity under consideration;
- An employment, student, or consulting (current or within the last five years) relationship with an entity under consideration; or
- An employment, student, or other relationship with a competitor of a program under consideration.

The COCA will err on the side of caution in applying this policy.

Applicability

The COCA Conflict of Interest Policy applies to members of the Commission, staff members, members of COCA committees or task forces who may be neither staff nor commissioners, members of the Site Evaluators Registry, and consultants with the potential to influence decisions of the COCA. Signed and dated Conflict of Interest forms (COI) will be updated and collected annually from Commissioners and staff and, as needed, from other persons referenced in this policy.

Review Teams

While scheduling site visits, a 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. Commissioners who participate on a site visit must recuse themselves from the discussion and vote on the COM being reviewed during the Commission's deliberation.

Recusals from Decisions

A primary responsibility under this policy is for persons to disclose a potential conflict of interest. Commission members must report a potential conflict of interest to the Chair or a staff member before any meeting. Recusals during any decision-making session of the Commission, the Executive Committee, or any related meetings will be documented as part of the official record. In the case of uncertainty about the need for a recusal, the Commission Chair or COCA Secretary will determine whether a conflict of interest exists and how it will be resolved. In situations where a specific COM is being discussed for action, the individual must recuse themselves and leave the room or the virtual meeting until after a formal action is taken. In situations where a collective action is being taken, such as approving a consent agenda that references a COM, persons with conflicts will note their abstention from action on that item, which will be recorded in the minutes of the event.

Overview of COCA Accreditation

As practiced in the United States today, accreditation is a process by which institutions and programs voluntarily undergo an extensive peer-based evaluation of their compliance with educational quality standards 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,

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

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 that holds accreditation from a recognized institutional accreditor.

Through accreditation, the COCA assures 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 ensures that graduates of an accredited COM who have earned a DO degree 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

Related Federal Regulation: 34 CFR §602.3

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). The COCA is recognized at this time as both an institutional accrediting agency for freestanding colleges of osteopathic medicine (COMs) and a programmatic accrediting agency for COMs within a parent entity that holds institutional accreditation.

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.

Programmatic accreditation by the COCA does not grant eligibility for Title IV Federal HEA programs.

Institutional Accreditation

As of March 1, 2024, the COCA announced that it will be seeking a change of scope and will no longer accept applications to serve as the institutional accreditor for any proposed new and developing college of osteopathic medicine (COM).

It is anticipated that as of March 1, 2029, institutional accreditation by the COCA will end for all COMs. The COCA will no longer confer eligibility for Title IV Federal HEA programs. Subsequently, regardless of its accreditation status, any COM previously institutionally accredited by

the COCA must obtain full institutional accreditation from a USDE-recognized institutional accreditor providing access to the Title IV Student Loan program to retain COCA's programmatic accreditation.

Should a COM fail to meet or maintain these eligibility requirements, the COCA will take action to deny or withdraw programmatic accreditation in accordance with its policies and procedures for such action.

New Osteopathic Medical Education Programs Seeking COCA Accreditation

To apply for programmatic accreditation from the COCA, a proposed college of osteopathic medicine or its parent institution must hold accreditation or have been granted at least candidate status (or similar) by a regional institutional accrediting agency recognized by the US Department of Education. The institution's accreditation must be achieved for the COM to progress to pre-accreditation. Once accreditation from the regional institutional accrediting agency is achieved, it must be maintained to retain COCA programmatic accreditation. If the proposed COM or parent institution fails to achieve institutional accreditation from the agency within the specified time, the COCA may deny or withdraw its programmatic accreditation in accordance with its policies and procedures.

Accreditation of Programs Outside of the United States

In accordance with 34 C.F.R. § 602.11, the COCA is authorized by the U.S. Department of Education for the accreditation and pre-accreditation of freestanding institutions of osteopathic medicine and of osteopathic medical programs leading to the degree of Doctor of Osteopathy or Doctor of Osteopathic Medicine in the United States. The COCA is not authorized to accredit osteopathic medical institutions or programs in other countries.

The COCA is recognized by the World Federation of Medical Education (WFME) as an accrediting agency working to an internationally accepted high standard of accreditation of undergraduate medical schools. WFME recognition does not authorize an agency to accredit medical education institutions or programs.

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 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.

Campus Types

Related Federal Regulation: C.F.R. § 600.2

Main Campus: The primary physical facility at which the institution offers eligible programs, within the same ownership structure of the institution, and certified as the main campus by the Department

of Education and the COCA.

Additional Location: A location that is geographically separate from the main campus and offers at least 50 percent of COM's osteopathic medical education program. The curriculum at the additional location must be the same as at the parent COM. The additional location will not have separate administration, faculty, or budgetary independence. The additional location must have a common Dean, faculty, and budget with the parent COM.

Branch Campus: A location that is geographically apart from the parent COM and i) is permanent in nature; ii) offers courses in educational programs leading to a DO degree; iii) has its own faculty and administrative or supervisory organization; and iv) has its own budgetary and hiring authority.

The curriculum at the branch campus may be the same as or different from that at the parent COM, but the Dean and leadership at the branch campus are responsible for developing and managing it. The branch campus must have a Dean and leadership that are distinct and separate from the parent COM, with no reporting structure to the Dean at the parent COM. The branch campus has a separate budget, and the Dean has full control and independent management over it.

The COCA will not grant pre-accreditation or accreditation to an institution comprising fewer than all of the programs, branch campuses, and locations of an institution as certified for Title IV participation by the USDE, except with notice to and permission from the Secretary of Education.

If the COCA's definitions of "additional location" or "branch campus" diverge from the Secretary of Education's definition, the COCA will conform its definitions to meet the Secretary's definition.

Interpretation of Standards

As part of its accreditation review, a COM submits a self-study that includes a narrative and supporting documentation to demonstrate its compliance with COCA's standards. The COCA empowers a trained team of evaluators to conduct an on-site visit to verify the COM's self-study assertions. The COCA reviews the self-study and the site team's report to assess compliance with the Standards' requirements. The COCA makes the final determination of compliance.

Publishing 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, the recognized accrediting agency for approving 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.

A COM must report a final decision of probation or an initiated adverse action to all current and prospective students within seven days of receiving such notice from the COCA.

Reporting Accreditation Actions

Actions to award initial accreditation and to reaffirm accreditation are reported to the USDE, applicable institutional accrediting and state agencies, and posted on the COCA website. COMs must post the status on their own website, with the wording included in the Commission's action letter.

The accreditation information reported to outside parties or 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.

To Programs/Institutions

Within 30 days of any final COCA action taken on the reports of comprehensive or focused site visits, the review of applications for Candidate status, Pre-Accreditation status, or a substantive change, the COCA staff will send a final action letter conveying the Commission's action to the COM's dean or equivalent position. The letter will include 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, and any changes to the COM's accreditation status. The COCA does not publish this letter, but the COM may disclose it at its discretion.

If a COM publicly discloses its accreditation status, it must do so 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.

Following a final decision of probation, an initiated adverse action, or the decision to deny, withdraw, suspend, revoke, or terminate pre-accreditation or accreditation, or to take any other adverse action, the COCA will report the action to the COM within 30 days after the final decision. Such notification will require the COM to notify current and prospective students within seven days of receiving notice of the action. No later than 60 days after receiving the notification, the COM must make available to the Secretary of Education, state licensing agency(ies), and the public, a brief statement summarizing the reasons for the COCA's decisions, and any official comments that the COM may wish to make, or a statement that the COM has chosen not to comment on the action.

To External Groups and the Public

Within 30 days of its meeting, the COCA will submit required notifications to the USDE, the relevant state licensing boards, higher education agencies, 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.

Accreditation decisions will be conveyed to the public by posting the accreditation action on the COCA website within 24 hours of notifying the COM. Notification to the USDE is made through the Database of Accredited Postsecondary Institutions and Programs (DAPIP).

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.

Following a final decision of probation, an initiated adverse action, or the decision to deny, withdraw, suspend, revoke, or terminate pre-accreditation or accreditation, or to take any other adverse action, the COCA will report the action to the public by posting it on the COCA's website within one business day of notifying the COM of the action, but no later than 30 days after the final decision.

Following a decision to deny or withdraw accreditation, the COCA will report the action to the public by posting it on the COCA's website within 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.

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 Education, the relevant institutional accrediting bodies, and the relevant state licensing agencies within 30 days of the withdrawal or lapse date.

COM Directory

The COCA publishes a current list of COMs holding Pre-Accreditation or Accreditation status on its website. Each listing includes the following information: name, address, phone number, and website of the COM; name and title of the Dean; date the COM was granted Pre-Accreditation status ("established date"); academic year of last accreditation site visit; academic 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.

Third-Party Comments

The COCA provides an opportunity for third-party comments about COMs undergoing review for Candidate, Pre-Accreditation, initial Accreditation, or reaffirmation of Accreditation status. The COCA also provides an opportunity for third-party comments on substantive changes or requests for teach-out agreements. Notice of an opportunity to submit third-party comments 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 a review will occur, along with the process by which third-party comments may be submitted. Comments must focus on potential non-compliance with accreditation standards or elements.

Third-party comments must be submitted in writing or via email at least 30 days before 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 comments, 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 to drive continuous improvement. It is expected that the resulting report will be forthcoming, with no intent to shield reviewers from discerning a COM's strengths and opportunities for improvement.

The COM's self-study report is submitted via the COCA electronic accreditation system at least 90 days before 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.

Site Visits

Some evaluations involve a site visit, where the COCA sends a team of evaluators to a COM to meet with COM personnel and, if applicable, students, and to review the COM's facilities. Comprehensive site visits focus on all the COCA standards and elements, while focused site visits focus on select standards/elements. COCA staff considers several criteria when selecting site evaluators, 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, as identified by the USDE (see §602.15(a)):

- Administrative personnel – someone currently or recently directly engaged in a significant manner in a postsecondary program or institutional administration (administrative operations, academic affairs, registration, and financial aid/services). This person typically serves as a student services evaluator
- Educators – someone currently or recently directly engaged in a significant manner in postsecondary education in an osteopathic medical education program (e.g., professor, instructor, academic dean). This person can serve as the clinical education evaluator (if a DO)

or the pre-clinical evaluator.

- Academic personnel – someone currently or recently directly engaged in a significant manner in postsecondary teaching and research. This person typically serves as the pre-clinical education evaluator.
- Osteopathic medical practitioners – an osteopathic physician, currently or recently, directly engaged in a significant manner in the practice of osteopathic medicine. This person typically serves as the clinical education evaluator.

The site visit team will also include a COCA staff member who will serve as a team secretary and coordinate site visit activities between the COM and the team.

The COM will have the 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 and approval by the COCA Secretary. Observers and trainees will confirm compliance with COCA's conflict of interest policy. Observers from the USDE, as well as those representing federal or state agencies or organizations with legitimate accreditation responsibilities, may also accompany on-site visit teams. Each observer's respective organization will cover costs incurred by the observer. COMs are not responsible for trainees' expenses.

There is no fee for a COCA site visit, but COMs are expected to reimburse the COCA for direct expenses related to travel, lodging, meals, and evaluator's daily honorarium. Expenses cover all days an evaluator is on site, including travel days, and include any costs incurred due to travel delays. COCA staff members do not receive honoraria.

Comprehensive Site Visits

The COCA staff will contact a COM approximately 12 months before the anticipated accreditation site visit date to establish specific on-site review dates. A comprehensive site visit typically requires two to three days on-site. Comprehensive site visits include additional locations and branch campuses, when applicable. An additional location typically includes one to two full days on site, and a branch campus typically requires two to three days on site.

Pre-Accreditation Site Visits

The COCA staff will contact a COM within 10 days of the COCA's approval of a pre-accreditation site visit. A pre-accreditation site visit typically requires two to three days on-site.

Pre-Operational Site Visits

The COCA staff will contact a COM within 10 days of the COCA's approval of their pre-accreditation status, or an additional location and branch campus's approval to recruit students, to schedule a pre-operational site visit. A pre-operational site visit will occur within six months before

the matriculation of a COM's first class. This visit typically requires one day on-site to complete and is evaluated by a team chair with a COCA staff member in attendance as a team secretary.

Focused Site Visits

The COCA may require a focused site visit as part of the COCA's monitoring activities, based on issues found in an accreditation report, complaint, progress report, or site visit that 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 address specific standards and elements as determined by the Commission. However, if the team identifies critical information relevant to other standards and elements while on site, it may document these observations in its report for the Commission's further review.

Site Visit Materials

Self-studies must be submitted no later than 90 days before the site visit begins. A shorter lead time may be approved by the COCA Secretary when required. COCA staff will review the site visit materials for completeness and request materials as needed. Approximately sixty days before the site visit, the evaluation team will receive the self-study. Evaluators will work with the COCA staff to request clarifying materials as needed. Requests for clarifying materials will be made two weeks before the site visit. No materials will be accepted during a site visit without approval from the site visit Team Chair.

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 before submitting them to the Commission for review. Staff verifies that materials have a complete response for each of the submission requirements. If staff determine that materials are incomplete, they will confer with program personnel to request clarification. 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, a new date will be set at a subsequent Commission session, and the COCA EC will be notified.

Commission Compliance Decisions

Following the review of all relevant information, the Commission 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.
- **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 COCA Executive Committee determines full compliance.

- **Defer:** The COCA may defer a decision on compliance if it determines that insufficient information is available to make a decision. The dean or institutional representative will be informed of the additional information required and the due date for its submission for review at a future COCA meeting.
- **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 for review at a future COCA meeting. Communications to the COM of this action must 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 must be no later than 24 months after the communication of non-compliance.

If there is a finding of “not met” as part of the Commission’s review of an application, a letter will be sent to the dean or institutional representative indicating the deficiencies in the application and instructions for resubmitting the application.

Commission Actions

Related Federal Requirements: 34 C.F.R. § 602.18(b)(6)(i-ii), 34 C.F.R. § 602.20(e), 34 C.F.R. § 600.11(c)

The COCA's decision-making body is the Commission. It is given the authority to make a range of decisions related to the accredited status of member 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 (COCA EC) to consider and take limited actions on such as evaluating monitoring reports and complaints, and providing technical reviews of documents, provided that its decisions are reported to the Commission at its next regularly scheduled meeting (see page 5).

The COCA does not apply any accreditation actions retroactively.

Candidate Status Actions

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 recognizes that some aspects of the COM are developing appropriately, even as full compliance must be verified at

a later date.

- Defer the decision if the Commission determines that there is insufficient information to make a decision. The Commission's decision to defer will specify the information required to make a decision and the timeline to submit required materials.
- 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 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 Actions

Pre-accreditation will be awarded to a proposed COM that is likely to succeed in obtaining accreditation. 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 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 decision if the Commission determines that there is insufficient information to make a decision. The Commission's decision to defer will specify the information needed to make a decision and the timeline to submit required materials.
- Deny the request, cite the pre-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 pre-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 applicable institutional accrediting and state agencies, 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 may not hold the status of Pre-Accreditation for a period exceeding five years (34 CFR § 602.16(a)(2)). During this five-year period, a pre-accredited COM must approve its inaugural class for graduation in order to be eligible for consideration for accreditation status. Accordingly, the COCA may grant pre-accreditation status to be effective no earlier than July 1 of the calendar year

prior to the matriculation of the first class of students. In the event the COCA determines the proposed COM meets the requirements for pre-accreditation status prior to this date, the proposed COM must remain in candidate status until it is eligible to be granted pre-accreditation status. During this interim period, the proposed COM will be granted candidate status with the permission to recruit but not to admit students or to offer instruction.

Accreditation Status Actions

Following the review of all relevant documentation from a COM seeking its initial accreditation status (from pre-accreditation status) or reaffirmation of its current 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.

For COMs seeking initial accreditation following pre-accreditation, 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.

For COMs seeking reaffirmation of accreditation that are compliant with all standards and elements at the time of the review, with no progress report required with this status, accreditation will be granted for ten 10 years. Regular monitoring is conducted through submission of the COCA annual report and the mid-cycle report that is due in year five. An accreditation period of 10 years is not available to COMs following an accreditation status of Accreditation with Probation or Accreditation with Warning.

For COMs seeking reaffirmation of accreditation that are compliant with all standards, but are non-compliant with one or more non-core element(s) that must be addressed via progress reporting, the accreditation period will be granted for seven (7) years. Monitoring is conducted through submission of the COCA annual report and the mid-cycle report that is due in year three. An accreditation period of seven (7) years is not available to COMs following an accreditation status of Accreditation with Probation or Accreditation with Warning.

For COMs achieving the status of Accreditation following a status of Accreditation with Probation or Accreditation with Warning that are compliant with all standards but non-compliant with one or more non-core element(s) that must be addressed via progress reporting, accreditation will be granted for a period of six (6) years. Monitoring is conducted through submission of the COCA annual report and the mid-cycle report that is due in year three.

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 one year. 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.

Denial of Accreditation

Deny the request for accreditation, citing the accreditation standards that have not been met by the COM.

If the COCA denies accreditation to an institution holding pre-accreditation status, it may maintain the institution's pre-accreditation status for currently enrolled students until the institution has had a reasonable time to complete the activities in its teach-out plan to assist students in transferring to other accredited institutions, but for no more than 120 days unless approved by the COCA for good cause.

The COCA may not move an institution or program from an accredited status to pre-accreditation status unless, following the loss of accreditation, the institution or program applies for initial accreditation and is awarded pre-accreditation status under the new application.

An institution that has had its pre-accreditation or accreditation withdrawn, revoked, or otherwise terminated for cause may not be considered for pre-accreditation or accreditation for 24 months, unless the action to withdraw the pre-accreditation or accreditation has been rescinded by the COCA. An institution may not be considered eligible for 24 months after it has withdrawn voluntarily from its pre-accreditation or accreditation status under a show-cause or suspension order issued by the COCA accrediting agency, unless that COCA rescinds its order.

An institution determined by the Commission to be out of compliance with any COCA standard or element is required to bring its operations into full compliance within a period defined by the COCA, but no more than 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.

Immediate Adverse Actions

The COCA may take immediate adverse action when it is determined that such action is warranted, such as when COM does not bring itself into compliance within the period specified in the COCA's decision letter. In taking an immediate adverse action, the COCA may maintain the COM's pre-accreditation or accreditation status until the COM has had a reasonable time to complete the activities in its teach-out plan or to fulfill the obligations of any teach-out agreement to assist students in transferring or completing their programs.

For COMs with multiple locations, the COCA may limit the adverse action to a particular location without necessarily taking action against all of its locations, provided the noncompliance was limited to that location.

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 the action the COCA determines that there is insufficient information to make a decision. The COCA's decision to defer will specify the requirements remaining to be met and a timeline to submit additional information.

- 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.

The Commission does not grant automatic approval of substantive changes or approve substantive changes retroactively.

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.

Accreditation Statuses

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.

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 USDE regulation (34 C.F.R. §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.

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 the 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.

Request for Reconsideration of a Decision

As an aspect of its due process provisions, the COCA allows a COM to request a reconsideration of an accreditation decision under specified circumstances. This policy covers decisions affecting the accredited status of a COM and the requirement that it requested prior to an appeal of an adverse action (see Appeal of Adverse Actions Policy).

Circumstances for a Reconsideration

A COM may request the Commission to reconsider its accreditation decision when it believes that the decision was subject to bias, injustice, factual error, or significant departure from established procedures and policies, and is of sufficient magnitude to warrant a reconsideration.

The COM's Chief Executive Officer or Chief Academic Officer must file a request for reconsideration within seven business days of receiving the Final Action Letter from the COCA. The COM must email the request and any documentation, including the reason for reconsideration and specific alleged issues, to the COCA Secretary at predoc@osteopathic.org. While a reconsideration action may not include new information, materials that were initially submitted and believed to have been improperly considered may be emphasized in the reconsideration request.

Reconsideration Review and Decision

The COCA Executive Committee (EC) will review the reconsideration request, together with the submitted documents and narrative, at its next regularly scheduled meeting. Verbal testimony from the COM will not be considered during this review. If the EC determines that the request so warrants, it will forward the request and documentation to the full Commission for reconsideration at its regularly scheduled meeting. When warranted, the COCA Chair can call for a special meeting of the Commission or the COCA Executive Committee.

Following a reconsideration review, the Commission will either maintain or modify its original action. The COCA Secretary will communicate the Commission's decision in writing to the COM within seven business days of its action.

If a COM has received an Adverse Action by the Commission, as defined in the COCA Appeal of Adverse Action Policy, the COM must have submitted a Request for Reconsideration of the action

and have received a determination from the Commission on that request, prior to initiating an appeal of the Adverse Action.

Appeal of Adverse Action

Related Federal Requirements: 34 C.F.R. § 602.25(f-h)(1)(i-iii), (2); 34 C.F.R. § 602.3

In the interest of integrity in its decisions and in keeping with federal policy, the COCA ensures appeal rights to its member institutions under certain circumstances. When a COM has been notified of the COCA's intent to take an adverse action, it may formally appeal the decision prior to it becoming effective. A five-member ad-hoc Appeal Panel will consider the appeal in keeping with this policy.

Appealable Actions

The US Department of Education (34 C.F.R. § 602.3) defines an adverse action by an accrediting agency as the denial, withdrawal, suspension, revocation, or termination of accreditation or pre-accreditation, or any comparable accrediting action an agency may take against an institution or program. In keeping with this definition, the COCA deems the following adverse actions as appealable:

- The denial of Candidate, Pre-Accreditation, or Accreditation status
- The withdrawal of Candidate, Pre-Accreditation, or Accreditation status

When such an action has been taken, the COCA will communicate with the COM the next steps it must take should it consider an appeal. The COCA will also make this action, together with the notice of a right to appeal, available to the public on its website. The COM bears the burden of proof for an appeal.

Prior to initiating an appeal for an adverse action, a COM must first submit a request for reconsideration of that action, in keeping with the COCA Request for Reconsideration Policy. If the Commission upholds the original adverse action following this request, the COM may then initiate an appeal.

Procedures for Filing an Appeal

Within 14 days of the receipt of the Commission's action following the Request for Reconsideration, the chief executive officer of the COM must provide to the COCA Secretary a written letter of intent to appeal the decision. The letter must include a brief statement of the failures of procedure that serve as the grounds for the appeal. The Secretary will document the receipt of such notice to the COM within three business days of its receipt.

Within 45 days of its notification of intent to appeal, the COM must submit its documentation in support of the appeal. The appeal must be based on the documentation available to the Commission at the time of its adverse decision and support the assertion that the Commission's action was arbitrary and capricious. Documentation must not exceed 25 pages of narrative, exclusive of supporting exhibits. Within 45 days of receipt of this information from the COM, the COCA will submit a response. These documents will be the basis for consideration by the Appeal Panel.

The COM must submit with its notice of intent to appeal a fee for appeal as specified in the current

COCA Dues and Fees schedule.

Appeal Panel

Any appeal must take place at a hearing before an appeals panel. The COCA Secretary will select a five-person ad-hoc committee (“Appeal Panel”) from a pool of former Commissioners eligible for participation on an Appeal Panel (“Appeal Panel Roster”).

- None of the members of the appeal panel may have served on the Commission at the time the decision being appealed was made.
- Appeal panel members must agree to comply with the COCA’s conflict of interest policy
- The appeal panel must include academic and administrative personnel, and educators and practitioners as defined under *COCA Membership*, above. One member of the panel will be a public member as defined by 34 C.F.R. § 602.3. The COCA Secretary will identify the panel chair and notify the COM about the membership of the panel, providing a reasonable time for the COM to identify any potential conflicts of interest in its membership.

A quorum (simple majority) of the panel with representation from the above constituencies must be present for any appeal panel action.

Appeal Panel Procedure

The COM may employ counsel to represent it during its appeal, including to make any presentation that the COCA permits as part of the appeal process.

Timing: The panel will convene to consider the appeal as soon as practicable, but in no case more than 120 days following the action being appealed.

New Evidence: While an appeal action may not include new information, materials that were initially submitted and believed to have been improperly considered may be emphasized in the appeal.

If the adverse action by the Commission was based on the financial condition of the institution at the time of the action, the COM may submit current, relevant, and significant financial information to the COCA for consideration if:

1. The financial information was unavailable to the COM until after the adverse decision was made.
2. The financial information is significant and bears materially to the financial deficiencies identified by the COCA; and
3. The only remaining deficiency cited by the COCA in support of the final adverse action decision is the COM’s failure to meet a COCA standard pertaining to finances.

Examination of Evidence: The hearing will take place at a time and place selected by the Secretary. The COCA will provide to the appeal panel all relevant documentation that was available to the Commission at the time of the decision.

Proceedings: Each party will be given one half hour to present its position to the appeals panel. The Panel Chair may grant additional time for each party as the Panel Chair may deem necessary.

Basis for Panel Decisions: The focus of these deliberations is on whether the original decision by the Commission was arbitrary or capricious and thus was not substantiated by the evidence available at the time of its deliberations.

Outcome of Proceedings

The panel's role is not advisory. Its findings are binding on all parties. The panel will draw one of the following conclusions:

- If the COM fails to demonstrate that the Commission's decision was arbitrary or capricious, the panel will affirm the original decision.
- If some aspects of the Commission's original decision are found to have been in keeping with its established procedures, but others were found to be arbitrary or capricious, the panel may amend the original action as it relates to specific elements without invalidating the other elements.
- If the Commission's decision as a whole is found to have been arbitrary or capricious, the panel may remand the decision to the Commission for a new deliberative process based on the findings of the panel. The panel will communicate its specific findings, which the Commission must incorporate in its deliberations.

If the decision being appealed is a decision denying or withdrawing pre-accreditation or accreditation, and if the appeal panel affirms the Commission's decision, the COM may seek reinstatement by complying with the requirements for Candidate status. The Commission may not return a COM from Accreditation status to Pre-Accreditation status. If a decision to withdraw accreditation is upheld by the panel, the COM must remain in accredited status long enough for currently enrolled students to obtain transfers to other institutions.

Reporting the Panel Findings

The panel Chair will report the findings of the panel in writing, together with an explanation of its basis for those findings, at the same time to the COCA Secretary, the COM's executive officer, and the Commission Chair for any subsequent action. The Commission must act in keeping with the panel's findings. If the panel's findings require the COCA to modify its public information about the COM, such changes will be made concurrent with its notification to the COM. No other information about the panel's composition, deliberations, or findings shall be released by the COCA. If an adverse decision is affirmed by the appeal panel, the COM must notify its students within seven days of notification of this decision.

Costs for Appeal

The appellate COM will submit an appeal fee as specified in the COCA Dues and Fees Schedule at the time of its submission of a letter of intent to appeal to the COCA. All other costs related to initiating and supporting its appeal will be the responsibility of the appellate COM.

Initial Arbitration

Related Federal Requirements: 34 C.F.R. § 602.20(e)

Federal law (20 U.S.C. § 1099b(e) (2024)) stipulates "The Secretary may not recognize the accreditation of any institution of higher education unless the institution of higher education agrees to submit any dispute involving the final denial, withdrawal, or termination of accreditation to initial

arbitration prior to any other legal action.” This policy defines how the COCA will conduct an Initial Arbitration with an institution that meets this policy.

Circumstances for Arbitration

A COM that has received an Adverse Action as defined in COCA’s “Adverse Action Appeal Policy,” has appealed the Commission’s decision, had that decision upheld by the appeal panel, and is considering legal actions regarding that decision, is required by federal policy to submit to initial arbitration prior to initiating any legal action. The COCA will facilitate arbitration as described in this policy.

Notice to the COM

Upon notice to a COM that an adverse action has been upheld upon appeal, the COCA will notify the COM that, should it be considering legal action related to this action, it must first submit to initial (non-binding) arbitration. The following terms will apply to that process:

- The selection of the arbitration body will provide for input from the COM.
- The arbitration body will have no relationship to the COCA, will be subject to its conflicts of interest policies, and will not have a decision-making function on behalf of the COCA. It will thus have no advantage over the COM in the arbitration process.
- In keeping with due-process expectations, the times set for arbitration deliberations will be reasonable.
- If both parties agree, the arbitration may be conducted under the rules of the American Arbitration Association.

Extensions for Good Cause Policy

Related Federal Requirements: 34 C.F.R. § 602.18(d); 34 C.F.R. § 602.20

Certain actions taken by the Commission pertaining to compliance requirements must include a time limit, typically two years or less, during which time the COM must demonstrate compliance. In keeping with federal criteria, the COCA may, for good cause, extend the stipulated time.

Circumstances Related to a Good Cause Extension

When the final decision by the Commission determines that any standard or core element does not comply with COCA’s requirements, this is communicated in writing to the COM, together with the required actions and the specified time for the COM to demonstrate compliance. The date of the Commission’s action begins the calculation of that time period.

Should the Commission determine a significant number of areas of noncompliance, it may award the status of Accreditation with Warning, Accreditation with Probation, or Accreditation with Show Cause, which are considered sanctions. When a sanction is imposed, the Commission may not continue the institution under the same or a new sanction beyond the maximum timeframe unless the institution presents evidence that there is good cause to provide further time for corrective measures and the Commission determines that the evidence supports an extension of time.

Criteria for a Good Cause Extension

Extensions for good cause are made in the COCA’s sole discretion according to the following criteria:

- The COM has demonstrated significant progress towards resolving its non-compliance issues
- The COM has provided written and compelling evidence describing its plans to achieve compliance within the period of extension
- The COM has provided written and compelling evidence that the nature of the change that must be made, such as facilities construction, renovation, or fundraising for scholarships, reasonably requires a period exceeding 24 months;
- The COM has provided documentation of the need for actions by groups external to the medical education program, such as decisions requiring actions by a university or legislative bodies.
- The COM can show that the circumstances requiring the period of noncompliance are beyond the COM's control, such as
 - A natural disaster or other catastrophic event significantly impacting the COM's operations;
 - Accepting students from another institution that is implementing a teach-out or closing;
 - Significant and documented local or national economic changes, such as an economic recession or closure of a large local employer;
 - Changes relating to State licensure requirements; or
 - The normal application of the COCA's standards creates an undue hardship on students.

The Commission may also take into account changes in the leadership of the COM, such as the chief executive officer or the dean/CAO, if a change is germane to the issues leading to the original compliance concern.

The Commission may, in its sole discretion, extend the period to permit a COM to achieve compliance for good cause up to 12 months beyond the standard two-year period to achieve compliance. In its communication with a COM, the Commission will specify the reason(s) for granting an extension for good cause and the period within which the COM must achieve compliance with the cited standard(s). The Commission may also specify monitoring activities during the period of extension to ensure that corrective actions are being accomplished in a timely manner.

Minimum Standards of Student Achievement

Related Federal Requirements: 34 C.F.R. § 602.16(a)(1)(i); 34 C.F.R. § 602.16(a)(2)

Student achievement is assessed and reported to the COCA at key intervals in pursuit of the DO degree.

COMLEX-USA Exam

During the second year of matriculation, all COM students are required to take and pass the Comprehensive Osteopathic Licensure Examination (COMLEX-USA) Level 1 Exam. During the fourth year of matriculation, students are required to take and pass COMLEX-USA Level 2-CE (Cognitive Evaluation).

Data Collection

Aggregate student pass rates for these exams from each COM, along with national norms for each administration, are provided to the COCA from the testing agency, the National Board of Osteopathic Medical Examiners (NBOME), at the completion of each testing cycle. In the interim, the Commission may request pass rate data from a COM. Data from these exams are reviewed by the COCA's Data and Reports Committee (DRC).

Reporting

The DRC will report COMLEX-USA Exam Level 1 and Level 2-CE first-time pass rates to the Commission, highlighting scores that are two standard deviations below the mean of all pass rates and below 90%. Three-year data will be reviewed annually by the COCA.

Notification

COMs with a first-time pass rate in Level 1 or Level 2-CE of the COMLEX-USA Exam that is more than two standard deviations below the mean of all the pass rates and below 90% may not apply for substantive change for a planned class size increase, an additional location, or a branch campus for three years. In addition, the COM will be required to submit a detailed plan for how it will improve pass rates on its COMLEX-USA examinations.

A COM with a first-time pass rate below this threshold in the COMLEX-USA Level 1 or COMLEX-USA Level 2-CE exam three years in a row will be determined to be out of compliance with the requirements of Element 11.4: COMLEX-USA. Non-compliance may be used in the determination of accreditation status. A COM that is found to be out of compliance will be required to submit a progress report documenting that it has returned to compliance with the requirements of this element.

Graduate Medical Education (GME) Placement Rate

The rate at which its graduating seniors are placed into graduate medical education (GME).

Data Collection

The placement rate is documented by the National Residency Match Program (NRMP) for each COM and reported as the percentage of graduates seeking placement who are successful through the Main Residency Match, the subsequent Supplemental Offer and Acceptance Program (SOAP), the military match, or similar programs. Placement data from the NRMP and related sources are reviewed by the Data and Reports Committee (DRC).

Reporting

The DRC will report the overall placement rate for each COM, highlighting placement rates below 95% highlighted. Three-year data will be reviewed annually by the COCA.

Notification

COMs with a GME placement rate below 95% may not apply for substantive change for a planned class size increase, an additional location, or a branch campus for three years. In addition, the COM will be required to submit a detailed plan for how it will improve future GME placement rates.

A COM with a GME placement rate below 95% for three years in a row will be determined to be out of compliance with the requirements of Element 11.5: GME Placement. Non-compliance may be used in the determination of accreditation status. A COM that is found to be out of compliance will be

required to submit a progress report documenting that it has returned to compliance with the requirements of this element.

Reliability of Data

The COCA both requires and relies upon these sources of data about student achievement because they come from external, highly regulated, and nationally-normed sources. Because the COMLEX-USA examinations are necessary for both licensure and future advancement within the profession, their development and administration are subject to rigorous psychometric oversight. The COCA relies on the placement data from the NRMP and related entities as an objective aggregate measure of a COM's success in preparing its graduates for placement in clinical practice within the profession.

In keeping with USDE regulation 34 C.F.R. § 602.16(a)(2), the COCA will carefully monitor the data submission process for any endeavor on the part of a COM to manipulate these data reports to its advantage. A COM found in violation will be subject to sanctions as determined by the Commission.

Use of Achievement Data to Uphold Requirements

The DRC will review the data from the NBOME and the NRMP and related entities for each COM on an annual basis. The DRC will forward a report to the Commission, which will identify any needed action based on the following criteria:

Similarly, a review by the DRC related to GME placement that reveals for any of the previous three years a placement rate below 95% will be subject to formal action by the Commission. In these cases, the Commission will not approve an application for a planned class size increase, an additional location, or a branch campus. The COM will also be required to submit a plan to the Commission delineating how it will improve GME placement rates.

Cohort Retention Rate

COM cohort retention rates are gathered on the COCA Annual Report. While the Commission has not yet established a minimum required retention rate, it may request additional information when necessary to ensure appropriate monitoring and oversight.

Cohort Graduation Rate

COM four, five, and six-year graduation rates for each cohort of students are gathered on the COCA Annual Report. While the Commission has not yet established a minimum required graduation rate, it may request additional information when necessary to ensure appropriate monitoring and oversight.

Monitoring through the Annual and Mid-Cycle 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 an 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

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

Annual Report

Related Federal Requirements: 34 C.F.R. § 602.19

The data collected as part of the annual report is determined each year by the COCA, related to various COM operations, including but not limited to : finances, faculty and staff levels, facilities, institutional accreditation status, changes to curriculum, and clinical education capacity.

COMs undergoing a comprehensive site visit review are not required to submit an annual report for that year. These COMs will still be required to complete the class size survey and any subsequent monitoring report required by the COCA.

Class Size Survey

Related Federal Requirements: 34 C.F.R. § 602.19(c)(d)

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.

While annual reports do not result in a change in accreditation status, COMs must take action to come into compliance with any standard or element found out of compliance during the annual report review. Failure to come into compliance may result in a change of accreditation status.

Mid-cycle Report

The purpose of a mid-cycle report is to allow a COM to self-assess its success at remaining in compliance with COCA standards between comprehensive accreditation site visits.

The COCA will review mid-cycle reports to ensure a COM's continuing compliance with the accreditation standards or to determine if there is credible information indicating a need for further investigation. Such an investigation may consist of any one or more of the following:

- Request for additional written information;
- Request to show cause as to why a COM is not in violation of an element(s) or standard(s); or
- Focused site visit.

While mid-cycle reports do not result in a change in accreditation status, COMs must take action to come into compliance with any standard or element found out of compliance during the mid-cycle review. Failure to come into compliance may result in a change of accreditation status.

Progress Report

Related Federal Requirements: § 602.18

A progress report may be requested by the Commission when it determines a COM is out of compliance with the requirement of any standard or element (through a finding of “not met”). The progress report must be submitted by the due date listed in the Final Action Letter, but can be no longer than 24 months after the initial determination of non-compliance. The Commission, will review progress reports to determine compliance. The Commission will document any requirements for further progress reports or may grant an extension of the time to come into compliance for good cause (see Criteria for a Good Cause Extension above).

The Commission may also determine if a focused site visit needs to be conducted in lieu of another progress report. Failure to comply with the requirements of a standard or element may result in a reduction in accreditation status.

Monitoring Reports

A monitoring report may be requested by the COCA when it determines that the requirement of any standard or element is met based on the information available at the time of the review, but requires additional assessment to ensure that the COM is in full compliance with the requirements (through a finding of “met with monitoring”). The monitoring report must be submitted by the due date listed in the Final Action Letter. The Commission, or the COCA Executive Committee, will review the monitoring report to determine if further monitoring is required. At any time during the monitoring period, the Commission may determine that the COM is out of compliance with the requirements of the standard or element and request a progress report.

Complaint Policy

Related Federal Requirements: 34 C.F.R. § 602.23(c)

This policy describes how various parties may register complaints to the COCA about a COM it accredits and about the COCA; it specifies how the COCA will respond to those complaints.

Complaints About a COM

The complaint policy protects the integrity of the accreditation review procedures. These procedures provide a mechanism for concerned individuals to bring to COCA’s attention information about matters at a COM that may be non-compliant with COCA’s standards.

The COCA does not mediate on behalf of a complainant or intervene in decisions made by an accredited program. Its role is limited to verifying that the COM has and follows policies and processes that are compliant with COCA standards.

Complaints about a COM may be submitted by an individual who has knowledge about a matter of potential non-compliance. Complaints must be submitted within two years of the alleged incident that is the basis of the complaint. The complaint must present a concern regarding one or more proposed violations of accreditation standards or procedures and must be based on direct and responsible

information.

A citation to the relevant standard or procedure must be included in the complaint. The complainant must provide a narrative of their allegation related to the accreditation standards or procedures and include any accurate documentation that could support the allegation. Supporting documents must be submitted in hard copy, Word, or PDF format (JPG or other file types cannot be accommodated). They must be combined into a single file, clearly labeled and referenced according to how they are cited within the complaint form for each standard referenced (i.e., a separate file for each standard or element referenced). Documents may not be password-protected or otherwise locked for editing (except for redacted information). Only documents that directly serve as evidence of the complaint should be submitted. All supporting documents must be submitted with the complaint. A request to submit additional information will reset the process timeline.

The complainant must provide evidence that an effort has been made to resolve the concern through COM administration (the dean or president), including information about any other actions taken to resolve the concerns before filing the complaint with the COCA.

The Complainant may elect to keep their personally identifiable information confidential from the institution or program that is the subject of the complaint by redacting their personally identifiable information from the supporting documentation. The complainant's name and contact information must be visible on the complaint form. Upon request, COCA staff will redact the information prior to processing the complaint. If the complainant wants personally identifiable information of other parties referenced in the complaint kept confidential, they must redact that information prior to submitting the complaint documentation.

COCA staff will provide guidance to a complainant who does not submit a complaint in accordance with COCA policies, allowing the complaint to be resubmitted prior to the complaint being reviewed, if the timeline for submission will not expire.

Complaints must be submitted within two years of the alleged incident that is the basis of the complaint. The complaint must be in writing and signed by the complainant. Unsigned or anonymous complaints will not be processed. Duplicate complaints submitted by an individual that address the same issues as complaints previously reviewed will not be considered. All signed complaints must be submitted to the Secretary, COCA, American Osteopathic Association, 142 E. Ontario St., Chicago, IL 60611, or via email to predoc@osteopathic.org.

COCA Response to Complaints

Within ten business days of receipt of a signed complaint, copies of the complaint will be sent to the COM's Chief Executive Officer or Chief Academic Officer for response to the complaint. The COM will have 15 business days to respond.

The complaint and the COM's response will be forwarded to the Commission Chair who will ask either the Executive Committee or an appointed an *ad hoc* subcommittee to determine whether the complaint merits further investigation. The determination of the Executive Committee or *ad hoc* subcommittee as to whether the COM is in compliance with COCA standards or if further investigation is required will be communicated to the complainant and the COM in writing. This

process will be concluded within 15 days.

If further investigation of the COM is warranted, the COCA Secretary, in cooperation with AOA corporate counsel and the Executive Committee or the *ad hoc* subcommittee will initiate a formal review within 30 days from the decision to initiate an investigation. The COCA Executive Committee or the *ad hoc* subcommittee will decide what mode of investigation is most appropriate for the complaint, which may include a written progress report, on-site visit, or any investigation as appropriate. The investigation of a complaint may be incorporated into a site visit, site visit or progress report previously scheduled for another purpose, even if this causes a delay in granting a final determination of the complaint allegations.

The Executive Committee or the *ad hoc* subcommittee's findings will be forwarded to the Commission. Based upon these findings, the Commission may dismiss the complaint and report that the COM is in compliance with the accreditation standards; or notify the COM that, based on an investigation, the COCA has determined that it fails to meet the accreditation standards. The determination of the Commission as to whether the COM is in compliance with COCA standards or has been asked to provide further demonstration of compliance will be communicated to the complainant in writing.

If the COM has been found to be out of compliance with any accreditation standard, the COCA may require one or more of the following methods of remediation:

- A monitoring report outlining the COM's plans to address the deficiencies;
- A progress report documenting the COM's planning and its implementation of the plans; or
- An on-site visit to determine whether a change in the accreditation status of the COM is warranted.

The determination of the complaint by Executive Committee or the COCA is final. These procedures should be completed, and the COM notified, within 15 days of the Executive Committee or COCA's decision. Decisions affecting the accreditation status of the COM may be subject to a request for reconsideration by the COM per COCA policies.

The timelines outlined in this Policy may be extended by the COCA Secretary when circumstances warrant.

Complaints About the COCA

A complaint about the COCA, including any commissioner or accreditation staff, must be in writing and signed by the complainant and submitted to the Secretary, COCA, American Osteopathic Association, 142 E. Ontario St., Chicago, IL 60611, or via email to predoc@osteopathic.org.

Complaints must be submitted within two years of the alleged incident that is the basis of the complaint.

The Complainant may elect to keep their personally identifiable information confidential from the COCA by redacting their personally identifiable information from the supporting documentation. The complainant's name and contact information must be visible on the complaint form. Upon

request, COCA staff will redact the information prior to processing the complaint. If the complainant wants personally identifiable information of other parties referenced in the complaint kept confidential, they must redact that information prior to submitting the complaint documentation.

COCA staff will provide guidance to a complainant who does not submit a complaint in accordance with COCA policies, allowing the complaint to be resubmitted prior to the complaint being reviewed, if the timeline for submission will not expire.

The COCA Secretary, in conjunction with AOA General Counsel, will present the complaint to the Commission Chair, Vice-Chair, and, when applicable, affected staff members. Any staff member or commissioner included in the complaint must recuse themselves from handling the complaint. A subcommittee of the Commission will be appointed by the Chair to formally review the complaint and develop a response. This subcommittee review process and response will be completed and forwarded to the Commission within 30 days of the date the subcommittee is convened.

The Commission will consider the complaint and the subcommittee's response at its next regularly scheduled COCA meeting. The complainant will be given the opportunity to present respective views in writing in the interest of an agreed-upon resolution. The final action of the Commission will be communicated to the complainant within 15 business days of its decision. The timelines outlined in this Policy may be extended by the COCA Secretary when circumstances warrant.

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, which 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 and Monitoring Reports

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.

Records Retention Policy

Related Federal Requirements: 34 C.F.R. § 602.15(b):

The COCA will retain accurate and complete records related to the review and decisions of each COM, including on-site evaluation team reports, the institution's or program's responses to on-site reports, periodic review reports, any reports of special reviews conducted by the agency between regular reviews, and a copy of the COM's most recent self-study.

The COCA will also retain records of all decisions made throughout a COM's affiliation with the agency regarding the accreditation and pre-accreditation of any COM, including those related to substantive changes, and all correspondence that is significantly related to those decisions.

The COCA will also retain its formal documents, such as *AOA Commission on Osteopathic College*

Accreditation Handbook; Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards and Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards, including all tables and appendices; Accreditation of Colleges of Osteopathic Medicine: COM Substantive Change Policies and Procedures; and COCA Policies and Procedures. Working documents, such as team members' hand-written notes, public comments on proposed actions, or miscellaneous email inquiries, will not be retained.

Duration of Retention

Records related to a COM's reviews will be retained at least for the duration of its last full accreditation or pre-accreditation review cycle.

Records such as minutes of the work of COCA's committees may be discarded after five years at the COCA's discretion.

Records of the COCA's decisions on the accredited status of a COM will be kept indefinitely.

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 staff review
- COCA commissioner review, completed by two reviewers
- Review and approval by the full Commission

See "Substantive Change Decisions" above.

The Commission does not grant automatic approval of substantive changes or approve substantive changes retroactively.

Distance Education Policy

Related Federal Requirements: 34 CFR §602.3.

The COCA accredits osteopathic medical schools and encourages all its accredited schools to be innovative and to use multiple methods of instruction to deliver their curriculum. The COCA, however, does not accredit stand-alone online medical school programs. The COCA believes that the science and art of osteopathic medicine must be gained by direct, in-person interaction with instructors and clinical education supervisors. For this reason, the COCA will not accredit programs offered solely by distance education as defined at 34 C.F.R. § 602.3.

Class Size Policy

Related Federal Requirements: 34 C.F.R. § 602.19(C)

Related COCA Policy: Substantive Change: Unplanned Class Size Increase Policy

In accordance with 34 C.F.R. § 602.19(c), COCA must monitor overall growth of the institutions or programs it accredits and, at least annually, collect head-count enrollment data from those institutions or programs.

The COCA approves a COM's class size based on information provided in the COM's application regarding available facilities, faculty, staff, and other factors to support the delivery of the osteopathic medical education curriculum. A COM may request a class size increase through the COCA's Substantive Change policies. A COM may also submit a substantive change request to establish a branch campus or additional location with a separate class size. As the Planned Class Size Increase policy states, "all COMs have an approved class size from the COCA. Each branch campus and additional location that the COCA recognizes will also have a separate, approved class size." Campus class sizes are monitored annually through the COCA's Class Survey conducted in September.

Each COM campus recognized by the COCA will have a separate, approved class size. In reviewing class sizes as part of the COCA Annual Report, the parent campus (COM) and any additional location or branch campus will be counted as separate class sizes. Per COCA policies, each campus may matriculate up to 8% over the approved class size of its first year (OMS I) class to accommodate student withdrawals after matriculation ("melt"). A COM, additional location, or branch campus may not be combined to calculate class size. For example, 7% at one campus and 9% at another campus for an average of 8% is not permitted.

The COCA policy threshold for matriculating over an approved class size is 8%. Matriculation counts should not be rounded up to anything over 8%. Any campus found to be over 8% of its approved class size may be subject to the COCA's Unplanned Class Size Increase policy. For example, a campus 8.01% above its approved class size would be over the 8% threshold. Additionally, COMs are required to notify the COCA immediately upon identifying a potential or actual unplanned class size increase that may/has occurred.

Increase in Approved Class Size

To request an increase in its approved class size, a COM may submit an application for a *Substantive Change: Class Size Increase*.

Decrease in Approved Class Size

The COCA may require a reduction in a COM's approved class size when evidence demonstrates sustained adverse student performance outcomes (e.g., COMLEX-USA Exam pass rates, graduation rates, GME placement rates) or when the faculty capacity, faculty-to-student ratio, or facilities and learning resources have materially declined since the COM's initial class size was approved, such that the COMs ability to deliver its curriculum effectively is compromised. Any action to reduce an approved class size will follow notification of the performance or compliance concern and will include an opportunity for the COM to address and correct the issue before a reduction is implemented. The COCA may restore the approved class size when the COM has demonstrated

improved student outcomes or corrected the identified shortfalls.

Teach-out Plans and Agreements Policy

Related Federal Requirements: 34 C.F.R. § 602.23(c), 34 C.F.R. § 602.24,

Under certain circumstances a COM is required to create a teach-out plan or agreement for review and approval by the Commission. This policy defines the circumstances under which each may be required and essential elements of these requirements.

Definitions

Teach-out plans and agreements are designed to ensure that students are able to complete their education in an equitable manner and with minimal disruption should a COM cease to operate prior to their graduation.

A teach-out is a process during which a program, institution, or institutional location that provides 100 percent of at least one program engages in an orderly closure or when, following the closure of an institution or campus, another institution provides an opportunity for the students of the closed school to complete their program, regardless of their academic progress at the time of closure.

A teach-out plan is a written plan developed by an institution that provides for the equitable treatment of students if an institution, or an institutional location that provides 100 percent of at least one program, ceases to operate or plans to cease operations before all enrolled students have completed their program of study

A teach-out agreement is a written agreement between institutions that provides for the equitable treatment of students and a reasonable opportunity for students to complete their program of study if an institution, or an institutional location that provides 100 percent of at least one program offered, ceases to operate or plans to cease operations before all enrolled students have completed their program of study

Federal and State Requirements

Related Federal Regulation: 34 C.F.R. § 602.24(c)

The COCA will require an accredited institution to submit a teach-out plan if any of the following occur:

1. For a nonprofit or proprietary institution, the USDE notifies the COCA of a determination by the institution's independent auditor expressing doubt about the institution's ability to operate as a going concern or indicating an adverse opinion or a finding of material weakness related to financial stability;
2. The COCA places the institution on probation.
3. USDE notifies the COCA that the institution is participating in Title IV, HEA programs under a provisional program participation agreement, and the USDE is requiring a teach-out plan as a condition of participation;

The COCA will require any institution in pre-accreditation or accreditation status to submit a teach-

out plan and, if practical, a teach-out agreement if any of the following occur:

1. The USDE notifies the COCA that it has placed the institution on the reimbursement payment method or the heightened cash monitoring payment method, requiring the USDE's review of the institution's supporting documentation;
2. The USDE notifies the COCA that it has initiated an emergency action against an institution or an action to limit, suspend, or terminate the institution participating in any Title IV, HEA program;
3. The COCA withdraws, terminates, or suspends pre-accreditation or accreditation of the institution;
4. The institution notifies the COCA that it intends to cease operations entirely or close a location that provides one hundred percent of the program, including if the location is being moved and is considered closed by the USDE to be a closed school; or
5. A state licensing board or authorizing agency notifies the COCA that an institution's licensing or authorization to provide the osteopathic medical education program has been or will be revoked.

Teach-out Plans or Agreements Required by COCA

Related Federal Requirement: 34 C.F.R. § 602.23(f), § 602.24(c)(7-10), § 602.24(d)

When the COCA serves as the institutional accreditor, a proposed COM seeking pre-accreditation must submit a teach-out plan with its Candidate Status application (which will be applied to its pre-accreditation application) to ensure that students completing the teach-out meet curricular requirements for professional licensure. The plan must include a list of academic programs offered by the institution and the names of other institutions that offer similar programs and that could potentially enter into a teach-out agreement with the institution.

If the COCA denies accreditation to a pre-accredited institution, the COCA may maintain the institution's pre-accreditation status for currently enrolled students until the institution has had a reasonable time to complete the activities in its teach-out plan to assist students in transferring or completing their program, but for no more than 120 days, unless an extension is granted by the COCA for good cause.

An institution with pre-accreditation or accreditation status that enters into a teach-out agreement either on its own or at the request of the COCA must submit the teach-out agreement to the COCA for approval.

If a COM notifies the COCA that it intends to cease operations entirely or to close a location that provides one hundred percent of a DO program, it will be required to submit a teach-out plan or agreement for approval by the COCA.

If an institution accredited or pre-accredited by the COCA closes without a teach-out plan or agreement, the COCA will work with the USDE and the appropriate State agency, to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charges.

Evaluation of a Teach-Out Plan

Related federal regulation: C.F.R. § 602.24(c)(3-4)

The COCA will evaluate a teach-out plan to ensure that it includes a list of currently enrolled students, the name of the program offered by the institution, and the names of other institutions that offer similar programs with which the institution could potentially enter into a teach-out agreement to meet the curricular requirements for students' graduation, graduate medical education, and professional licensure.

If the COCA approves a teach-out plan that includes a program or institution accredited by another recognized accrediting agency, the COCA will notify the agency of its approval of the teach-out plan.

Evaluation of a Teach-Out Agreement

Related federal regulation: C.F.R. § 602.24(c)(5-10)

The COM must submit the teach-out agreement to the COCA for review and approval at least 120 days before the transfer of students under the agreement begins, when possible.

A teach-out agreement for an institution that is pre-accredited or accredited by the COCA must be with a program or institution that is pre-accredited or accredited by the COCA to ensure consistency with COCA's accreditation standards and procedures. The teach-out agreement must include:

1. A complete list of students currently enrolled in the osteopathic medical education program and the program requirements that each student has completed;
2. A plan to provide all potentially eligible students with information about how to obtain a closed school discharge and, if applicable, information on State refund policies;
3. A record retention plan to be provided to all enrolled students that delineates the final disposition of teach-out records (e.g., student transcripts, billing, financial aid records);
4. Information on the number and types of credits the teach-out institution is willing to accept prior to the student's enrollment;
5. A clear statement to students of the tuition and fees of the educational program and the number and types of credits that will be accepted by the teach-out institution.
6. A statement that students will receive all the instruction promised by the closed institution that is not being provided because of the closure.

The COCA will review any teach-out agreement to ensure it provides for equitable treatment of all students by ensuring that the teach-out institution:

1. Has the necessary experience, resources, and support services to provide an educational program that is of acceptable quality and reasonably similar in content, delivery method, and scheduling to that provided by the institution that is ceasing operations;

2. Has the capacity to carry out its mission and meet all obligations to existing students; and demonstrates that it
 - a. can provide students access to the program and services without requiring them to move or travel for substantial distances or durations; and
 - b. will provide students with information about additional charges, if any.
3. In general, such instruction will be provided without additional costs and tuition charges to the student. If the COM determines that additional charges are needed, the plan will specify those charges and the basis for them; such additional charges must be directly related to the cost of instruction.
4. All students are specifically notified in writing of any additional costs and tuition charges for each of the potential receiving COMs.
5. Any additional costs and tuition charges for a receiving COM will be the same for all students who transfer to that COM.
6. The recipient teach-out COM demonstrates that it will remain stable, carry out its mission, and meet all obligations to its existing students during the period of the teach-out agreement.
7. The closed COM will strive to place students in a COM that is geographically proximate to the closed COM.
8. The recipient COM(s) request an increase in class size through COCA's substantive change process to take additional students from the closed institution.

An institution may not serve as a teach-out institution if:

1. For a nonprofit or proprietary institution, the Secretary of Education notifies the COCA of a determination by the institution's independent auditor expressing doubt about the institution's ability to operate as a going concern or indicating an adverse opinion or a finding of material weakness related to financial stability;
2. The COCA places the institution on probation.
3. The Secretary of Education notifies the COCA that the institution is participating in Title IV, HEA programs under a provisional program participation agreement, and the Secretary of Education has required a teach-out plan as a condition of participation.

Irrespective of any teach-out plan or signed teach-out agreement, an institution may not serve as a teach-out institution under the following conditions:

1. The COCA receives notification from the Department of Education of a determination by the institution's independent auditor expressing doubt about the institution's ability to operate as a going concern or indicating an adverse opinion or a finding of material weakness related to financial stability.
2. The COCA has placed the institution on probation.
3. The COCA receives notification from the Department of Education that the institution is participating in Title IV, HEA programs under a provisional program participation agreement and the Secretary has required a teach-out plan as a condition of participation.

4. The USDE notifies the COCA that it has placed the institution on the reimbursement payment method or the heightened cash monitoring payment method, requiring the USDE's review of the institution's supporting documentation;
5. The USDE notifies the COCA that it has initiated an emergency action against an institution or an action to limit, suspend, or terminate the institution participating in any Title IV, HEA program;
6. The COCA withdraws, terminates, or suspends pre-accreditation or accreditation of the institution;
7. The institution notifies the COCA that it intends to cease operations entirely or close a location that provides one hundred percent of the program, including if the location is being moved and is considered closed by the USDE to be a closed school; or
8. A state licensing board or authorizing agency notifies the COCA that an institution's licensing or authorization to provide the osteopathic medical education program has been or will be revoked.
9. The institution is under investigation, subject to an action, or being prosecuted for an issue related to academic quality, misrepresentation, fraud, or other severe matters by a law enforcement agency.

The COCA may waive requirements regarding the percentage of credits a student must earn at the institution awarding the degree if the student is completing their program through a written teach-out agreement or transfer.

The institution must provide the COCA with copies of all notifications related to its closure or teach-out options to ensure the information accurately reflects students' ability to transfer credits, and may require corrections as needed.

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.

Honorary Doctoral Degree Policy

To maintain the integrity and academic standards of its accredited programs of osteopathic medicine, the COCA prohibits awarding honorary Doctor of Osteopathic Medicine/Doctor of Osteopathy (DO or HonDO) degrees. While honorary degrees may serve as a means of recognizing individuals, they are susceptible to misunderstanding, misuse, and abuse. They may undermine the credibility and value of an earned DO degree.

This policy does not prohibit a COM from awarding a posthumous DO degree according to the COM's established policies.

Distance Education

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 C.F.R. § 600.2 as education that uses one or more technologies (e.g., internet, one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices, audio conference, or other media) to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.

Research Policy

The Department of Accreditation staff may conduct research, or contract with a third party to conduct research with the approval of the COCA, based on confidential information in a de-identified form contained in annual reports, self-study documents, and site visit reports. The source documents used for such research may not be shared or made available to other individuals or organizations. Data obtained from the annual reports may be shared or made available to other individuals or organizations to the extent that confidentiality requirements and data-sharing agreements of the American Osteopathic Association, as the sponsoring organization, permits.

Review of Standards Policy

Related Federal Requirements: 34 C.F.R. § 602.21

In view of the need for the COCA standards of accreditation to be kept both rigorous and relevant to a rapidly-changing healthcare environment, and in keeping with federal criterion 34 C.F.R. § 602.21 (a-b),(c-d), the COCA will follow a prescribed process and calendar for reviewing and updating its accreditation standards. The standards must be compliant with federal regulations and reflect best practices in higher education.

Timing for Review

The COCA will undertake a comprehensive and inclusive review of its accreditation standards every five years. In order to obtain and process input from various constituencies, the review will begin approximately 12 months prior to the approval and effective date on any revised standards. Should it

become evident that any individual standards need to be modified in the interval between comprehensive reviews, such changes will be initiated promptly, but in no case later than 12 months from the identification of that need.

Process for Review

The COCA will notify its multiple constituencies that it is open to receive evaluative comments regarding the current standards in terms of the quality of osteopathic medical education they define and the relevance of the educational program as students are being prepared to enter the profession. The COCA will solicit comments from a broad and representative group of constituents, including but not limited to representatives from all accredited and pre-accredited COMs and proposed COMs in candidate status. Notices will also be sent to related organizations within the profession, such as the American Association of Colleges of Osteopathic Medicine (AACOM) and the American Osteopathic Association (AOA) for distribution to their constituencies as they deem appropriate.

Parties interested in contributing comments related to the COCA standards will be directed to a link on the COCA website, which will be open to receive initial comments for a designated period of time. Any comments received will be taken into account by the Standards Review Committee (SRC), a standing COCA committee. The committee will prepare a preliminary draft of proposed changes to forward to the Commission. Drafts of changes that are approved by the Commission for public comment will be posted on the COCA website for a 30-day period of public comment. Announcements of these postings for public comment will be sent to the constituencies listed above.

Comments received will be considered by the SRC and a final draft submitted to the Commission for approval. The Commission may adopt the proposed standards by a majority vote. The Commission will also establish the effective date when institutions will be required to comply with the new standards, including whether compliance by new and developing COMs will be phased in as they progress in their development.

At its discretion, and by majority vote, the Commission may modify the accreditation standards to clarify their requirements, align requirements with related COCA policies and procedures, or correct grammatical errors, without soliciting public comment.

Publication of New Standards

Upon adoption by the Commission, the new standards will be published on the COCA website, including in the publications *Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards* and *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*. The academic year when the standards are applicable will also be published.

Respect for Actions of Other Agencies Policy

Related Federal Requirements: 34 C.F.R. § 602.28(a) to (e); 34 C.F.R. § 602.24(c)(4)

The COCA conducts its quality assurance activities in collaboration with other agencies in the higher education sector and, as such, is required to share its decisions with, and receive information from, these other entities

The COCA will not grant initial or renewed accreditation or pre-accreditation to a DO program offered by an institution if the COCA knows, or has reasonable cause to know, that the institution is the subject of:

- A pending or final action brought by a State agency to suspend, revoke, withdraw, or terminate the institution's legal authority to provide postsecondary education in the State;
- A decision by another recognized agency to deny accreditation or pre-accreditation;
- A pending or final action brought by a recognized accrediting agency to suspend, revoke, withdraw, or terminate the institution's accreditation or pre-accreditation; or
- Probation or an equivalent status imposed by a recognized agency.

If the COCA grants pre-accreditation or accreditation to a program within an institution subject to an above-listed action, it will communicate the basis for this action, consistent with COCA standards, to the Secretary of the USDE within 30 days of its action.

If the COCA learns through required reporting that the institution in which it accredits or pre-accredits a DO program has been subject to an adverse action, including probation, by the institution's accreditor, the COCA will immediately initiate a review of the program to determine whether any comparable action should be taken by the COCA. In the event of a probation decision by another agency, the COCA will determine whether to grant or continue pre-accreditation or accreditation based on a review to determine if the areas cited as the reasons for the probation action by the institutional accreditation agency or state chartering authority represent non-compliance with one or more COCA accreditation standards.

Should the COCA take an adverse action on a COM, and upon request by another recognized accreditor, the COCA will share with that agency the information that served as the basis for its action.

Notification to Other Agencies and the USDE

Related Federal Requirements: 34 C.F.R. § 602.26

The COCA will submit required notifications to the USDE, the relevant state medical licensing boards, the relevant institutional accreditation bodies, and the public about actions taken at a COCA meeting affecting the accreditation status of a COM within 30 days of the meeting, including the decision to award initial pre-accreditation or accreditation or renew a COM's pre-accreditation or accreditation status.

1. The COCA will provide written notice to the Secretary of Education, appropriate State licensing agencies, and appropriate accrediting agencies at the same time it notifies the COM, but no later than 30 days after the decision was made:
 - a. A final decision of probation or an initiated adverse action;
 - b. A final decision to deny, withdraw, suspend, revoke, or terminate accreditation
2. For a decision of probation or an initiated adverse action, the COCA will notify the Secretary

of Education, the relevant state medical licensing boards, the relevant institutional accrediting bodies, and the public at the same time that it notifies the COM, but no later than 30 days after the final decision.

3. For a decision to deny, withdraw, suspend, revoke, or terminate the pre-accreditation or accreditation of a COM, or take any other adverse action, the COCA will notify the Secretary of Education, the relevant state medical licensing boards, and the relevant institutional accrediting bodies at the same time that it notifies the COM, but no later than 30 days after the final decision.
4. If a pre-accredited or accredited institution or program withdraws its pre-accreditation or accredited status voluntarily or otherwise allows its pre-accreditation or accreditation status to lapse, the COCA will inform the Secretary of Education, the relevant accrediting bodies, the relevant state licensing agencies, and, upon request, the public, within 10 days of receiving notification of withdrawal or the lapse date.

Notifications to USDE/Secretary of Education

Related Federal Requirements: 34 C.F.R. § 602.27(a)(1-6)

The COCA will submit the following information to the USDE:

1. On an annual basis, a list of the programs for which the COCA has awarded Pre-Accreditation or Accreditation status.
2. When requested by the Secretary of Education, a summary of the COCA's major accrediting activities during the previous year, including the award of initial and continuing Candidate status; the award of initial and continuing Pre-Accreditation status; and the award of initial and continuing Accreditation status.
3. Any proposed change in the COCA's policies, procedures, or pre-accreditation or accreditation standards that may alter its scope of recognition or compliance with the criteria for recognition.
4. Notification that the COCA has expanded its scope of recognition to include distance education or correspondence courses.
5. The name of any institution or program accredited by the program that the COCA has reason to believe is failing to meet its Title IV, HEA program responsibilities or is engaged in fraud or abuse, along with the COCA's reasons for concern about the institution or program.
6. Upon request, any information that may bear upon a pre-accredited or accredited institution's compliance with its Title IV, HEA program responsibilities, including the eligibility of the institution or program to participate in Title IV HEA programs.

Ordinarily, the COCA will copy the affected COM on any correspondence with the USDE as described in this section. The need for confidentiality of that contact, based on the circumstances, will be considered on a case-by-case review by the USDE. Upon request by the USDE, the COCA must treat the contact as confidential.

The COM may also, upon receipt of such notice, require that certain personal or proprietary information be redacted from the documentation forwarded by COCA to the Department.

Program and Institution Reporting Requirements

When a COM publicly discloses its accreditation status, it must do so accurately. Any incorrect or misleading statements made by a COM about the COCA's accreditation actions or the COM's accreditation status must be corrected immediately. Failure to promptly correct or clarify the information may result in reconsideration of the COM's accreditation status. The public information must also include the COCA's contact information so that the information can be verified.

When receiving notification of probation or a show-cause indicating the initiation to deny, withdraw, suspend, revoke, or terminate pre-accreditation or accreditation, or take any other adverse action by the COCA, or receiving notification of a final decision to deny, withdraw, suspend, revoke, or terminate pre-accreditation or accreditation, or take any other adverse action by the COCA, a COM must disclose the decision to current and prospective students within seven business days of receipt, and must make available to the Secretary of Education, appropriate state licensing agencies, and the public within 60 days, a brief statement summarizing the COCA's decision and any official comments that the COM may wish to make with regard to the decision, or evidence that the COM has been offered the opportunity to provide official comment.

Willful Deception Policy

The provision of false or misleading information or the failure to provide material information may affect accreditation status. If the COCA determines that a program has knowingly supplied false or misleading information or has failed to supply relevant material information to the COCA, to a site visit team, or on any required report, the COCA will reconsider the program's accreditation status and term and determine any appropriate follow-up action, which may include a change in the COM's accreditation status or term. Similar action may be taken if a COM knowingly takes actions that result in misleading information being provided to the COCA or site visit teams, makes misleading or incorrect public statements or disclosures regarding its accreditation status, or fails to notify interested parties of an adverse accreditation action.