

**COCA Substantive Change Request:
Change in Educational Mission or Objectives
of the Institution**

Effective for reviews submitted on or after October 1, 2024

**Commission on Osteopathic College Accreditation
American Osteopathic Association
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General Information

A substantive change is any modification in a college of osteopathic medicine's (COM) operations, governance, or legal status that does not have a material adverse effect that could impact the COM's capacity to continue to meet the Commission on Osteopathic College Accreditation's (COCA) accreditation requirements for the delivery of the osteopathic medical education curriculum.

Substantive changes that must be reported to the COCA are defined by the U.S. Department of Education under 34 CFR §602.22. The COCA will not grant "pre-approval" of additional locations or branch campuses as those substantive changes are defined in 34 CFR §602.

A COM must receive prior approval from the COCA at least 120 days before the implementation of the substantive change, or within the time frame described under each change below. The COCA will consider requests for expedited reviews of any substantive change application in emergency situations.

The COCA will approve a substantive change when the criteria for the requested change have been met, and the COCA determines that the substantive change will not have a material adverse effect on the capacity of the COM to meet the continuing accreditation standards.

Substantive changes that require COCA approval include:

1. Any change in the established mission or objectives of the institution;
2. A change in location of the institution;
3. Any change in the legal status or form of control of the institution;
4. A change of instruction which represents a significant departure from the current curriculum;
5. A change from clock hours to credit hours or vice versa;
6. A substantial increase or decrease in the number of clock or credit hours awarded for completion of the curriculum;
7. A substantial increase or decrease in the length of the curriculum;
8. Establishment of an additional location or branch campus geographically apart from the main campus;
9. Contracting with a non-Title IV eligible institution for between 25% and 49% of a program;
10. Acquisition of any other institution or any program or location of another institution;
11. Addition of a permanent location at which a teach-out is being conducted for students of another institution that has ceased operations;
12. Any anticipated or unplanned increase in class size;
13. Transition from a branch campus to an additional location or vice versa; and
14. Transition from a branch campus or additional location to an independent COM.

The COCA may consider simultaneous substantive change requests submitted at the same time but may not consider a new request when another request is under review. The COCA will consider requests for reviews of any substantive change application when another is being reviewed in emergency situations.

The COCA will consider applications only from COMs with a current accreditation status of Accreditation or Accreditation with Exceptional Outcome and have no outstanding unmet elements from any type of monitoring including comprehensive reviews, focused reviews, and midcycle reports, for any of the following substantive changes:

1. Additional Location
2. Branch Campus
3. Planned Class Size Increase
4. Acquisition of any other Institution or any Program or Location of Another Institution

The COCA reserves the right to deny any substantive change request.

Substantive Changes Requiring Comprehensive Evaluation

The COCA may require that requests for substantive change be evaluated with a comprehensive evaluation, in addition to the evaluation requirements that exist for each type of substantive change, including whenever the COM meets one or more of the following conditions:

1. Had its last comprehensive site visit three (3) or more years ago;
2. Has received an accreditation status that included “with warning,” or “with probation,” within the last five (5) years;
3. Had an approved substantive change-class size increase within five (5) years;
4. Had a substantive change-unplanned class size increase within seven (7) years;
5. Had an approved substantive change-branch campus within five (5) years; or
6. Had an approved substantive change-additional location within five (5) years.

The COCA may grant a new cycle of review of continuing accreditation to a COM that undergoes a comprehensive site visit for purposes of evaluating a request for substantive change.

If COCA serves as a COMs institutional accreditor, additional information may be required to demonstrate compliance with elements in Standard 12 of the COCA COM Continuing Accreditation Standards. As of March 1, 2024, the COCA will no longer accept applications to serve as an institutional accreditor.

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 one of the six USDE recognized institutional accreditors to retain

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COCA's programmatic accreditation.

Queries about whether a proposed change qualifies as a substantive change and initial requests for a substantive change should be submitted to the COCA at predoc@osteopathic.org or (312) 202-8124. A staff member will contact you to discuss the process and required fees. The required substantive change documents must be submitted through COCA-approved electronic media.

Change in Educational Mission or Objectives of the Institution

Definition

A substantive change in educational mission or objectives will be considered when the change results in a need to alter the admissions policies, organizational chart, facilities, or financial plans as a result of the new mission or objectives.

Timing

Application must be reviewed by the COCA at a meeting held at least 120 days prior to when the anticipated change would become effective. Application materials must be submitted at least 90 days prior to the COCA meeting where the substantive change request will be reviewed.

Application

A request for a change in the established educational mission or objectives must provide documentation that describes:

1. The rationale for the change;
2. If the COM is part of a larger institution, a description of how the change impacts the mission of the parent organization;
3. The process to make the change in mission/organizational objectives;
4. The effect this change will have on learning outcome assessments, facilities, faculty, admission policies and procedures, and the curriculum;
5. Governing body review and approval;
6. Implementation plan to announce the proposed change to students, faculty, staff, alumni, and the public; and
7. Anticipated date of when the change in mission or objectives will be implemented.

Depending on the nature of the requested change to educational mission or objectives of the institution, a self-study may be required documenting compliance with the one or more of more of the following **Continuing accreditation elements**:

1. **Element 1.1: Program Mission**

A COM must have a mission statement that: 1) explains the overall purpose of the COM's program; and 2) serves as a guide for program planning and assessment. A COM must include a commitment to advancing diversity, equity, and inclusion (DEI) in its mission, values, vision, goals, or objectives. Where the COM is part of a larger educational institution or parent institution, the COM's mission must be consistent with the institution's mission. The COM must review its program mission at least once every five years and upon review, if the COM deems it to be appropriate to do so, the COM should revise its mission to meet the COM's growth and continued development. The COM must consider the input of its students, faculty, and staff, with representation from all additional locations and branch campuses (unless the branch has a separate mission) when reviewing and revising its mission and any value, vision, goal, or objective statements.

Provide:

- a. The updated program mission.
- b. The values, vision, goals or objectives statements.
- c. The link to the public webpage where the documents are published.
- d. If the COM is part of a larger educational institution (parent institution), the parent institution's mission statement. The documents should show the last updated date (or effective date).
- e. Documentation of the mission revision process, participants (including faculty, staff, and students), and meeting minutes documenting the most recent governing board approval of the COM's mission.

2. **Element 1.2: Strategic Plan**

A COM must produce and publish a current strategic plan addressing all core aspects of the COM's mission, including the advancement of diversity, equity, and inclusion (DEI). The strategic plan must include all additional locations. The strategic plan may include a COM's branch campus, or a branch campus may have a separate strategic plan. Students, faculty, and staff, from each additional location and branch campus (unless the branch has its own plan) must be included in the strategic plan development, review, and revision.

Provide:

- a. The COM strategic plan noting updates based on the updated mission statement.
- b. The list of individuals who participated in the plan creation/revision.
- c. The link to the public webpage where the documents are published.

3. **Element 1.5a: Non-Discrimination**

A COM must have a policy of non-discrimination and anti-sexual harassment with regard to students, administrative personnel, faculty and staff based on race, ethnicity, color, sex, sexual orientation, gender, gender identity, national origin, age, disabilities, and religion. This must apply to all COM actions.

A COM, or its parent institution, must develop a mechanism for students, faculty, and staff to report alleged discrimination incidents and track their resolution

Provide:

- a. A copy of the non-discrimination and anti-sexual harassment policies.
- b. A link to the public webpage where the policies are published.
- c. A description and flowcharts of the processes for reporting alleged discrimination and sexual harassment incidents and tracking their resolution.
- d. Provide a log of all COM-related reported discrimination and/or sexual harassment incidents and resolution for each incident since the last COCA accreditation cycle.

Element 1.5b: Non-Discrimination for Faith Based Institutions

The COCA respects the religious mission of faith-based schools. A COM having a religious affiliation or purpose must have a policy of non-discrimination and anti-sexual

harassment with regard to students, administrative personnel, faculty, and staff but need not apply all selection criteria listed in Element 1.5a if each omission is directly related to that affiliation or purpose, and so long as the policies are made known to applicants and the public and do not contravene any other COCA standard. This must apply to all proposed COM actions.

A COM, or its parent institution, must develop a mechanism for students, faculty, and staff to report alleged discrimination incidents and tracking their resolution, as appropriate for the COM's faith-based mission.

Provide:

- a. A faith-based mission for the COM or its parent institution.
- b. A copy of the non-discrimination and anti-sexual harassment policies.
- c. A link to the public webpage where the policies are published.
- d. A description and flowcharts of the processes for reporting alleged discrimination and sexual harassment incidents and tracking their resolution.
- e. Provide a log of all COM-related reported discrimination and/or sexual harassment incidents and resolution for each incident since the last COCA accreditation cycle.

4. **Element 3.1: Financial Resources**

A COM and any branch campus must ensure that the financial resources of the school are adequate to sustain a sound program of osteopathic medical education and to accomplish the programmatic and institutional goals. Because of the potential financial consequences, if any COM or its parent institution experiences a change in status regarding its participation in the Title IV programs following its initial establishment of participation, it must notify the COCA.

Provide:

- a. An updated operational budget that shows impact to the financial resources available to the operation and stability of the COM and/or institution. The operational budget should include (at minimum) the anticipated income, revenue sources, and expenses including budget for faculty and staff through the anticipated graduation of the first class of students.
- b. Documentation of any changes in status in Title IV HEA program participation.

5. **Element 3.2: Financial Planning and Budgeting**

A COM and any branch campus must have a budgetary process that is designed to support the mission of the COM, including at any additional locations.

Provide:

- a. A flowchart demonstrating the budget development process indicating where the final budget approval occurs and clearly reflecting the Dean's role in the process.

6. **Element 4.1: Facilities**

A COM (and any branch campus) and its additional location must have facilities for the program of instruction that enable the authorized class size of students and faculty to

pursue the mission, curriculum content and delivery, and research/scholarly activity of the COM.

A COM (and any branch campus) must have access to facilities for simulation and standardized patient encounters and must demonstrate how the facilities contribute to student achievement of learning outcomes of its curriculum.

A COM (and any branch campus) must assess the adequacy of the core and required clinical rotation facilities and involve students in the assessment.

The COM must have space available for use by students in a manner intended to support diversity, equity, and inclusion to the extent permitted by law, and must consult with students in the process of establishing such a space.

Provide:

- a. A completed Continuing Table 4.1 to describe the on-campus facilities dedicated to DO students.
- b. Floor plans of the facilities with designations of how the space will be utilized (full architectural drawings are not required).
- c. A description of, and indicate on the floor plans provided, the facilities used for simulation, study space, DEI support, and standardized patient encounters provided to students.
- d. How the COM assesses the adequacy of the core and required clinical rotation facilities, including how students are involved in the assessment.
- e. How the COM facilities contribute to student achievement of learning outcomes of the curriculum.
- f. How the COM assesses the adequacy and efficacy of facilities intended to support diversity, equity, and inclusion, including how students are involved in the assessment.

7. **Element 5.2: Diversity**

A COM must publish policies on and engage in ongoing, systematic, and focused recruitment and retention activities to the extent permitted by law, to achieve mission-appropriate diversity outcomes among its students, faculty, senior administrative staff, and other relevant members of its academic community.

A COM must include in these activities the use of programs and/or partnerships with other institutions and organizations aimed at achieving diversity among qualified applicants for medical school admission and the evaluation of program and partnership outcomes.

A COM must make available by request three years of student, faculty, and staff demographics, at a minimum including race/ethnicity and gender. The mechanism to request this data must be published and easily identifiable on the COM's website. When applicable, for any value less than ten, the COM should indicate that value as "less than 10" in place of the value.

Provide:

- a. The policies of the COM that demonstrate its current practice of systematic and focused recruitment and retention activities, to achieve mission-appropriate diversity outcomes among its students, faculty, senior administrative staff, and other relevant members of its academic community.
- b. A description of the programs and partnerships the COM has with other institutions and organizations aimed at achieving diversity among qualified applicants for medical school admission and the evaluation of program and partnership outcomes of the COM.
- c. A link to the public webpage where student, faculty, and staff demographics can be requested.

8. **Element 6.2 Programmatic Level Educational Objectives**

A COM and any branch campus must define and make all programmatic level educational objectives known to students, faculty, and others with responsibility for student education and assessment.

Provide:

- a. The programmatic level educational objectives for the osteopathic medical education program.
- b. The link to the public webpage where the information is published.

9. **Element 6.12: Diversity, Equity, and Inclusion (DEI) Curriculum**

A COM must incorporate diversity, equity, and inclusion into its curriculum to the extent permitted by law.

Provide:

- a. A description of the COM's curriculum that includes issues related to diversity, equity, and inclusion.
- b. A curriculum map demonstrating where the diversity, equity, and inclusion content is delivered.

10. **Element 7.1: Faculty and Staff Resources and Qualifications**

At all educational teaching sites, including affiliated sites, a COM must have sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment at core rotation sites, must hold current medical licensure and have had AOA or ABMS board certification at some time in their career or be currently board eligible in the specialty being taught.

A COM must have a mechanism to review and approve credentials of physician faculty that have never been board certified or are not board eligible by the AOA or ABMS at non-core rotations sites.

All non-physician faculty in the patient care environment must have demonstrated appropriate qualifications in their disciplinary field.

Provide:

- a. An organizational chart (including titles and names) demonstrating how the faculty are organized.
- b. A completed Continuing Table 7.1a and 7.1b
- c. A description of the mechanism to review and approve credentials of physician faculty that have never been board certified or are not currently board eligible by the AOA or ABMS at non-core rotations sites.

11. **Element 7.9: Diversity, Equity, and Inclusion (DEI) Training**

A COM must offer DEI training to employed faculty and staff at least annually to the extent permitted by law.

Provide:

- a. Documentation demonstrating that DEI training is offered to all COM-employed faculty and staff at least annually.

12. **Element 9.1: Admissions Policies**

A COM must establish and publish, to the public, admission requirements for potential applicants to the osteopathic medical education program and must use effective policies and procedures for osteopathic medical student selection for admission and enrollment, including demonstration of technical standards for admissions. A COM must tie all admissions policies to the COM mission.

Admissions policies for COMs with additional locations must be the same for the parent campus and its additional location. Branch campuses may have separate admissions policies.

Provide:

- a. All admission requirements and policies and procedures for osteopathic medical student selection and enrollment.
- b. The technical standards required of prospective students.
- c. The link to the public webpage where the policies are published.

13. **Element 11.1: Program Assessment**

A COM must conduct learning outcome assessments that connect to its program mission, goals, and objectives to continuously improve the educational quality of its osteopathic medical education program.

Provide:

- a. The guiding documents which govern how the COM conducts program learning outcome assessments. This may be in the form of a program review manual or guide that has been adopted by the faculty. This must describe an assessment of the osteopathic core competencies in the curriculum
- b. A list of the program learning outcome assessments performed over the past three academic years.
- c. Examples of changes in curriculum, pedagogy, counseling, or other aspects of the

student experience that have been made as a result of recent program reviews in order to more fully support student learning, including the core competencies.

Monitoring

Monitoring will occur as part of the routine annual reporting to the COCA. In addition, the COCA may require a progress report, student survey, or a focused site visit.

Successful completion of the application and all required monitoring, and approval by COCA, completes the Change in Educational Mission or Objectives of the Institution process.