

COCA Substantive Change Request: Change in Hour Calculations

Effective for reviews submitted on or after October 1, 2024

**Commission on Osteopathic College Accreditation
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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 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 Hour Calculations

Definition

A change from utilizing credit hours to clock hours, or vice versa, for calculation of course credit assigned.

Timing

A request for a change in hour calculation must be reviewed at the April COCA meeting in the calendar year prior to when the desired change will occur. Application materials must be submitted 90 days prior to the COCA meeting when the substantive change request will be reviewed.

Application

A COM requesting to change from clock hours to credit hours or vice versa must provide documentation that describes the following:

1. Rational as to why the COM is making the change;
2. Anticipated impact to students and faculty;
3. Anticipated impact to the curriculum, if any;
4. Impact on the classification of part-time vs full-time students;
5. Impact on the anticipated graduation date of existing students;
6. Approval from the COM's regional or institutional accreditor, if not institutionally accredited by the COCA;
7. Curriculum committee discussion and approval; and
8. Faculty governance discussion and approval.

A self-study will be required demonstrating compliance with the following **Continuing accreditation elements**:

1. **Element 1.3: Licensing and Regional/Institutional Accreditation**

A COM must maintain in effect any charter, licenses, or approvals required for it to function as an institution of higher education, including the provision of degree programs beyond the secondary level.

The parent/sponsoring institution under which the COM operates (or the independent COM itself) must be recognized by an institutional accrediting agency that is recognized by the United States Department of Education (USDE). A COM must report to the COCA any adverse actions that are taken against it or its parent institution by its institutional accreditor within five business days of notification of such action.

Any COM, branch campus, or additional location on or adjacent to another institution's campus must clearly state that the DO degree is not affiliated with the host institution.

Provide:

- a. The charter, license, or letter of approval from all states and agencies issuing such approvals.

- b. The link to the public webpage where the most recent institutional accreditation and COCA accreditation information is published.
- c. The link to the public webpage that describes the COM's relationship with a partner institution (if applicable).

2. **Element 6.1: Curriculum Design and Management**

A COM and any branch campus must have in place an approved body (e.g., curriculum committee) that exercises collective responsibility for the education program as a whole, and has responsibility for the development, management, evaluation, and enhancement of the curriculum. This committee must include student and faculty representation from the pre-clinical and clinical education years, including representation from any additional campus locations. The curriculum must ensure that students attain the skills, including osteopathic core competencies, interprofessional education and humanistic skills, necessary to demonstrate GME readiness and meet the mission of the COM.

Provide:

- a. The charge and responsibility of the approved body/curriculum committee.
- b. A list of the current members of the approved body/curriculum committee and their titles.
- c. A list of meeting dates, rosters of attendees, and meeting minutes for the past academic year.
- d. A brief description of the COM's curriculum design and teaching methods. (Not to exceed 250 words.)

3. **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. A link to the public webpage where the information is published.

4. **Element 9.2: Academic Standards**

A COM must publish and follow policies and procedures on academic standards that include grading, class attendance, tuition and fees, refunds, student promotion, retention, graduation, students' rights and responsibilities, and the filing of grievances and appeals.

Provide:

- a. Copies of policies and procedures on academic standards, including:
 - i. grading
 - ii. class attendance
 - iii. tuition and fees
 - iv. refunds
 - v. student promotion

- vi. retention
- vii. graduation
- viii. students' rights and responsibilities
- ix. filing of grievances and appeals

Note: If these policies/procedures are part of a larger document, please provide a specific citation (e.g., page number/section number) to where the above policies can be located.

b. The link to the public webpage where the documents are published.

5. **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

All 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 Hours Calculations process.