

~~Accreditation of Colleges of Osteopathic  
Medicine:~~  
**COCA Substantive Change Request: Policies  
and Procedures**  
**Contracting with a Non-Title IV Eligible  
Institution for 25% to 49% of a Program**

Effective for reviews submitted on or after ~~August 1, 2021~~ July 1, 2024

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~~Revised 6/24/2021 to add Additional Programs policy.~~

## 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

A COM with a status of Accreditation with **Heightened Monitoring Finding** may apply for any of the above substantive changes when all standards have been met through a progress report, focused site visit, or any other monitoring the COCA may require for at least one year. COMs with a status of Accreditation with **Warning Monitoring** must demonstrate compliance with the standards for three years. COMs with a status of Accreditation with **Probation Warning** must demonstrate compliance with the standards for four years.

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

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as an institutional accreditor.

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](mailto: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-Online~~ COCA-approved electronic media.

## **Contracting with a non-Title IV Eligible Institution for 25% to 49% of a Program**

### Definition

A contract with a non-Title IV eligible institution occurs when a COM enters into an agreement under which an institution or organization not certified to participate in Title IV or Higher Education Act (HEA) programs offers between 25% and 49% of the COM's educational program.

If the instruction will occur at the COM or this change will impact 25% - 49% of the program offering, then this will be reviewed as a Substantive Change – Change in Curriculum.

The COCA does not approve contracts with non-Title IV eligible institutions to provide 50% or more of a COM's educational program.

### Timing

The request must be reviewed at a COCA meeting at least 18 months prior to the anticipated start date of the contract. Application materials must be submitted at least ~~60~~ 90 days prior to the COCA meeting where the substantive change request will be reviewed.

### Application

The request for contracting with a non-Title IV eligible institution must include documentation that describes the following:

1. Introduction to the COM, including history and mission;
2. Introduction to the non-Title IV eligible institution for the proposed contract;
3. Need for contracting with a non-Title IV eligible institution;
4. The curriculum to be provided by the contracted institution;
5. The facilities at which the contracted curriculum will be provided;
6. The faculty that will providing instruction at the contracted institution (current licensing and certification documents must be provided for any physician faculty);
7. How this change will impact the COM's curriculum;
8. How this change will impact students, faculty, and staff;
9. Plans to announce the proposed changes to students, faculty, staff, alumni, and the public; and
10. How the curriculum provided by the contracted institution will be assessed.

The COCA may request additional information it deems necessary depending on the nature of the agreement between the two institutions, including the completion of a self-study, or a site visit (with required self-study) to the site contracted to provide the osteopathic medical education program.

### Monitoring

The criteria for evaluation and monitoring will be determined depending on the nature of the agreement between the two institutions. This may include a progress report(s), student survey, and/or a focused site visit.

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Successful completion of the application and all required monitoring, and approval by COCA, completes the Contracting with a non-Title IV Eligible Institution for 25% to 49% of a Program process.