COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION Kenneth J. Veit, DO, MBA, Chair

This report is for the period from June 1, 2010 through May 31, 2011. During this period the AOA Commission on Osteopathic Accreditation (COCA) met three times: August 28-29, 2010; December 11-12, 2010; and April 30 – May 1, 2011. A training session on COCA standards for members of the Evaluators Registry of the colleges of osteopathic medicine (COM) was conducted on January 15-16, 2011.

COCA meeting in August 2010

The COCA met on August 28-29, 2010 at the Crowne Plaza Chicago O'Hare Hotel (Rosemont, IL). Prior to the meeting, an orientation session was conducted for a newly appointed COCA member. Accreditation action items for the agenda included:

- One report from a branch campus site visit was reviewed and accepted for the Edward Via College of Osteopathic Medicine (Blacksburg, VA) in Spartanburg, SC.
- □ The Edward Via College of Osteopathic Medicine (Blacksburg, VA) received permission to recruit, admit students and offer instruction at its campus in Spartanburg, SC. This campus was also added to the accreditation of the parent campus.
- One report from an additional location site visit was reviewed and accepted for the Western University of Health Sciences/College of Osteopathic Medicine of the Pacific (Pomona, CA) with additional location in Lebanon, OR.
- ☐ The Western University of Health Sciences/College of Osteopathic Medicine of the Pacific (Pomona, CA) received permission to recruit, admit students and offer instruction at its campus in Lebanon, OR.
- One provisional accreditation site visit report was reviewed and approved.
- Continuing provisional accreditation was approved for the Rocky Vista University College of Osteopathic Medicine (Parker, CO).
- □ Three reports from focused visitations were approved for: Midwestern University / Chicago College of Osteopathic Medicine (Downers Grove, IL); Oklahoma State University Center for Health Sciences College of Osteopathic Medicine (Tulsa, OK); University of Medicine and Dentistry of New Jersey/School of Osteopathic Medicine (Stratford, NJ).
- Deleven progress reports were reviewed and accepted from the: A.T. Still University, School of Osteopathic Medicine in Arizona (Mesa, AZ); Lake Erie College of Osteopathic Medicine (Erie, PA); Midwestern University / Arizona College of Osteopathic Medicine (Glendale, AZ); Ohio University College of Osteopathic Medicine (Athens, OH); Pacific Northwest University of Health Sciences College of Osteopathic Medicine (Yakima, WA); Touro College of Osteopathic Medicine (New York, NY); University of Medicine and Dentistry of New Jersey/School of Osteopathic Medicine (Stratford, NJ); University of North Texas Health Sciences Center/Texas College of Osteopathic Medicine (Fort Worth, TX); Edward Via College of Osteopathic Medicine (Blacksburg, VA); William Carey University College of Osteopathic Medicine (Hattiesburg, MS); West Virginia School of Osteopathic Medicine (Lewisburg, WV)
- □ Four special reports were reviewed and accepted from the: Kansas City University of Medicine and Biosciences College of Osteopathic Medicine (Kansas City, MO); Pacific Northwest University of Health Sciences College of Osteopathic Medicine (Yakima, WA); Rocky Vista University College of Osteopathic Medicine (Parker, CO); West Virginia School of Osteopathic Medicine (Lewisburg, WV);
- □ Two substantive change requests were reviewed and approved for the: Georgia Campus-Philadelphia College of Osteopathic Medicine (Suwanee, GA) Class Size Increase; and, Lake Erie College of Osteopathic Medicine-Bradenton (Bradenton, FL) Class Size Increase.
- One substantive change request was reviewed and deferred pending receipt of additional information New York College of Osteopathic Medicine (Old Westbury, NY) Curriculum change.

□ Five follow-up reports based upon review of the annual reports were reviewed and accepted for the following COMs: A.T. Still University, School of Osteopathic Medicine in Arizona (Mesa, AZ); Edward Via Virginia School of Osteopathic Medicine (Blacksburg, VA); Touro College of Osteopathic Medicine (New York, NY); University of North Texas Health Science Center /Texas College of Osteopathic Medicine (Fort Worth, TX); Western University of Health Sciences/College of Osteopathic Medicine of the Pacific (Pomona, CA).

Policy discussion items for the agenda included:

- □ Submission of comments to the U.S Department of Education on the notice of proposed rulemaking (NPRM) on Integrity Issues.
- ☐ Approval of membership on the COCA Appeal Panel for the 2010-2011 year.
- □ Approval of two nominees to the Evaluators Registry.
- Approval of expansion of scope for one member of the Evaluators Registry.

COCA meeting in December 2010

The COCA held its fall meeting on December 11-12, 2010 at the O'Hare Hilton Hotel (Chicago, IL). Accreditation action items for the agenda included:

- One report from a comprehensive site visit was reviewed and accepted for Michigan State University College of Osteopathic Medicine (East Lansing, MI).
- □ Continuing Accreditation status was granted to the Michigan State University College of Osteopathic Medicine (East Lansing, MI).
- One report from a pre-accreditation site visit was reviewed for the: Marian University College of Osteopathic Medicine (Indianapolis, IN). A decision on pre-accreditation was deferred to allow for receipt of additional information.
- One previously-deferred substantive change request was reviewed and approved for the New York College of Osteopathic Medicine (Old Westbury, NY) - Curriculum change.
- Ten progress reports were reviewed and accepted for the: A.T. Still University School of Osteopathic Medicine in Arizona (Mesa, AZ); Midwestern University / Arizona College of Osteopathic Medicine (Glendale, AZ); Pacific Northwest University College of Osteopathic Medicine (Yakima, WA); Rocky Vista University College of Osteopathic Medicine (Parker, CO); Touro College of Osteopathic Medicine (New York, NY); University of North Texas Health Sciences Center / Texas College of Osteopathic Medicine (Fort Worth, TX); Edward Via College of Osteopathic Medicine (Hattiesburg, MS); and, Western University of Health Sciences / College of Osteopathic Medicine of the Pacific (Pomona, CA) additional location in Lebanon, OR.
- Four special reports were reviewed and accepted from the following COMs: Kansas City University of Medicine and Biosciences College of Osteopathic Medicine (Kansas City, MO); Pacific Northwest University College of Osteopathic Medicine (Yakima, WA); Rocky Vista University College of Osteopathic Medicine (Parker, CO); West Virginia School of Osteopathic Medicine (Lewisburg, WV).

Policy and discussion items for the agenda included:

- ☐ The COCA discussed proposed changes to Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures. A table of outstanding requests for review by COCA was referred to the Standards Review Committee.
- □ The COCA reviewed and approved for posting amended revisions for Chapter II: Applicant and Accreditation Procedures, Table 1 and Flow Chart for public commentary.
- □ The COCA reviewed and approved the change in monitoring for COMs that were granted substantive change class size increase prior to May 22-23, 2010. Progress reports for these COMs will reflect the current standards monitoring for Year 3 and Year 4 addressing all standards pertaining to clinical education.
- ☐ The COCA discussed and approved proposed changes to the COM Annual Supplemental Report.

- ☐ The 2010 COM class size report was reviewed and accepted. Two COMs were found to be over their allotted class size; monitoring was directed as provided for in the accreditation procedures.
- ☐ The 2012 calendar year COM site visit schedule was reviewed and approved.
- ☐ The COCA reviewed and approved two nominations to the Evaluator's Registry.
- ☐ The COCA received and accepted the following notices from the COM Appeal Panel: one individual indicated that he preferred not to serve due to retirement; one individual resigned due to health reasons; one individual's secretary notified the COCA that he had passed away. Upon election these positions were filled.
- AOA President Karen J. Nichols, DO, MACOI, addressed the COCA on the topic of creation of more osteopathic graduate medical education training positions. The COCA Chair announced that he would appoint a 3-5 member sub-committee to study the issue of adequacy of OGME training positions and make recommendations on related changes in the standards and procedures for accreditation of COMs.

COCA meeting in April - May 2011

The COCA held its spring meeting on April 30 – May 1, 2011 at the O'Hare Hilton Hotel (Chicago, IL). The meeting was observed by Jennifer Hong-Silwany, EdD, Staff Analyst, Accreditation Division, U.S. Department of Education. Dr. Hong-Silwany was observing this meeting as part of her review of the petition for continuing recognition submitted by COCA on January 7, 2011.

Accreditation action items from the agenda included:

- □ Two reports from comprehensive site visits for continuing Accreditation were reviewed and accepted for: Lake Erie College of Osteopathic Medicine (Erie, PA); and, University of New England College of Osteopathic Medicine (Biddeford, ME).
- □ Continuing Accreditation status was granted to the following two COMs: Lake Erie College of Osteopathic Medicine (Erie, PA) and University of New England College of Osteopathic Medicine (Biddeford, ME).
- ☐ Three reports from comprehensive initial Accreditation on-site evaluations were reviewed and accepted for the following COMs: A.T. Still University, School of Osteopathic Medicine in Arizona (Mesa, AZ); Lincoln Memorial University-DeBusk College of Osteopathic Medicine (Harrogate, TN); and Touro College of Osteopathic Medicine (New York, NY).
- ☐ Initial Accreditation status was granted to the following COMs: A.T. Still University, School of Osteopathic Medicine in Arizona (Mesa, AZ); Lincoln Memorial University-DeBusk College of Osteopathic Medicine (Harrogate, TN); and Touro College of Osteopathic Medicine (New York, NY).
- □ Three reports from comprehensive provisional accreditation on-site evaluations were reviewed and accepted for the following COMs: Pacific Northwest University of Health Sciences, College of Osteopathic Medicine (Yakima, WA); Rocky Vista University College of Osteopathic Medicine (Parker, CO); and William Carey University College of Osteopathic Medicine (Hattiesburg, MS).
- □ Continuing Provisional accreditation was granted to the following two COMs: Pacific Northwest University of Health Sciences, College of Osteopathic Medicine (Yakima, WA); and, Rocky Vista University College of Osteopathic Medicine (Parker, CO).
- One previously-deferred request for Pre-accreditation was reviewed and granted to Marian University College of Osteopathic Medicine (Indianapolis, IN).
- □ Five progress reports were reviewed and accepted for the following COMs: Michigan State University College of Osteopathic Medicine (East Lansing, MI); Marian University College of Osteopathic Medicine (Indianapolis, IN); Pacific Northwest University of Health Sciences College of Osteopathic Medicine (Yakima, WA); Edward Via College of Osteopathic Medicine-Carolinas (Spartanburg, SC); and Western University of Health Sciences / College of Osteopathic Medicine of the Pacific (Pomona, CA).
- □ Four special reports were reviewed and accepted: Kansas City University of Medicine and Bioscience College of Osteopathic Medicine (Kansas City, MO); Pacific Northwest University College of Osteopathic Medicine (Yakima, WA); Rocky Vista University College of Osteopathic Medicine (Parker, CO); West Virginia School of Osteopathic Medicine (Lewisburg, WV).

- Four mid-cycle reports were reviewed and accepted: A.T. Still University of Health Sciences Kirksville College of Osteopathic Medicine (Kirksville, MO); Midwestern University/Arizona College of Osteopathic Medicine (Glendale, AZ); University of Medicine and Dentistry of New Jersey School of Osteopathic Medicine (Stratford, NJ); and Edward Via College of Osteopathic Medicine-Virginia (Blacksburg, VA).
- □ Annual reports were received and accepted from all 25 COMs; additional information was requested from 9 of the COMs.

Policy discussion items for the agenda included:

- □ Proposed revisions to the document COM Accreditation Standards and Procedures, as authorized for public commentary by the COCA at its meeting of December 11-12, 2010, together with the commentary received, were reviewed in the forum conducted by the Standards Review Committee (SRC) on April 2, 2011. Based upon that review and subsequent review by the SRC in a teleconference on April 19th, the recommended revisions were presented to the COCA for their consideration: Chapter II: Applicant and Accreditation Procedures (Revised); Flow Chart of Procedures for Chapter II (New); Chapter IX, Table One (Revised); Standard Five: Students. After review and discussion, the COCA voted to approve the proposed revisions. The revisions become effective on July 1, 2011.
- □ The COCA reviewed technical revisions needed to meet USDE requirements as identified in the draft staff analysis of the COCA's petition for continuing recognition. The technical revisions occurred in the procedures pertaining to the USDE and in the COCA Handbook. The COCA approved these proposed revisions as presented. The revisions become effective on July 1, 2011.
- Regulations issued by the U.S. Secretary of Education in October 2010 required institutional accrediting agencies to have procedures for review of assignment of credit hours (see 34 CFR 602.24(f)). The Assistant Secretary, Office of Postsecondary Education issued a "Dear Colleague Letter" to accrediting agencies that addressed how to proceed in complying with this procedure. Accrediting agencies will be given the period from July 1, 2011 through June 30, 2012 to demonstrate "good faith" compliance with this regulation. Thereafter, full compliance is issued beginning on July 1, 2012. In response the COCA reviewed and approved an "Interim Standard" under 5.3.7 subject to further review at the December 2011 COCA meeting in order to comply with this regulation. All requests for revisions to the accreditation documents were approved as presented. This revision becomes effective on July 1, 2011.
- ☐ Four individuals were approved for addition to the Evaluators Registry.
- One current member of the Evaluators Registry was approved for expansion of expertise.
- One current member of the Evaluators Registry was approved for qualification as Team Chair.

COCA - Executive Committee (COCA - EC)

August 2010 Report – there was no COCA-EC report at this meeting.

December 2010 Report

The COCA-EC met in executive session by teleconference on October 4, 2010 and took the following actions:

- □ Reviewed the draft feasibility study analysis of a developing COM and approved the analysis report, with the requirement of additional information prior to scheduling a site visit to review preaccreditation;
- □ Reviewed the draft feasibility study analysis of a developing COM and approved the analysis report with authorization to schedule a site visit to review pre-accreditation.

The COCA-EC met in executive session by teleconference on November 4, 2010 October 4, 2010 and took the following actions:

- ☐ Discussed assessment of outcomes for COM graduates; and
- Reviewed one complaint and recommended dismissal from further investigation.

April - May 2011 Report

The COCA-EC met in executive session by teleconference on January 24, 2011 and took the following action:

Reviewed the response materials submitted by a developing COM, prepared in response to an earlier analysis of the COCA-EC with request for additional information, with the requirement of additional information prior to scheduling a site visit to review pre-accreditation.

The COCA-EC met in executive session by teleconference on March 31, 2011 and took the following actions:

Reviewed the draft feasibility study analysis of a developing COM and approved the analysis report, with the requirement of additional information prior to scheduling a site visit to review preaccreditation.

Annual Report Review Committee

August 2010 Report – there was no Annual Report Review Committee at this meeting.

December 2010 Report - The Annual Report Review Committee met on November 16, 2010 via teleconference. The Committee considered adding a section to the report to collect data from each COM regarding Graduate Medical Education (GME) placement on a yearly basis. Questions to ask COMs regarding this collection of GME data were created and put in a table for easier response. In addition, staff was asked to review the Annual Supplemental Report to propose changes and additions to the report. The Annual Report Committee agreed with the proposed changes in wording. They also agreed to collecting data regarding annual prospective and retrospective assessment of adequacy of a COM's affiliations for predoctoral clinical rotations. Adequacy would be indicated by the number of students and areas of instruction taking place at a COM's affiliated clinical educational sites, early identification of at-risk osteopathic medical students, and graduation and licensure rates.

April - May 2011 Report - there was no Annual Report Review Committee at this meeting.

COM Accreditation Appeal Panel

There were no appeals heard during this year.

Committee on College Accreditation Training (CCAT)

August 2010 Report -

An informational report was given on the June 18 and July 27, 2010 teleconference meetings. The CCAT Chair met with staff on June 18, 2010 via teleconference to begin the initial planning for the 2011 Evaluator Training Workshop scheduled to begin on Saturday, January 15 and conclude on Sunday, January 16 at 2 p.m. in Las Vegas, NV. The Chair indicated that he would like to continue with the theme of the January 2009 workshop "Consistency in Interpreting [and Applying] the Standards."

The CCAT Chair met with staff via teleconference on July 27, 2010 to continue planning of the 2011 Evaluator Training Workshop. The primary focus was to review the responses to the Team Chair Survey and identify additional program topics for the Evaluators Workshop. Based on the survey results and additional discussion, the following topics were identified for potential sessions: report writing, reviewing financial documents, developing faculty adequacy models, reaching consensus/establishing consistency, the impact of USDE requirements on the standards and accreditation visits, institutional evaluation, using assessment data to improve program quality, clerkship oversight, integration of OMM in Years 3 and 4, and conflict resolution/managing team differences. Participants also determined that Dr. Nichols would be invited to present introductory remarks on her presidential theme "Teamwork" during lunch, followed by the keynote address on "Teamwork." Staff announced the new CCAT members.

December 2010 Report -

An informational report was given on the September 2, 2010 and November 1 teleconference meetings. On September 2, 2010, the agenda for the meeting focused on (1) planning of the CCAT Evaluator Training Workshop; (2) evaluators recommended for removal from the *Evaluators Registry*; and (3) the September 2010 Evaluator Training Webinar.

The Committee discussed the draft agenda for the CCAT Evaluator Training Workshop on January 15-16, 2011, at the Paris Las Vegas Hotel, in conjunction with the AOA OME/CME conferences. Committee members reviewed and approved the workshop title/theme "Bridging the Gap:

Achieving Consistency in Standards Review," discussed each session, and identified speakers. At the August 28, 2010 COCA meeting, staff presented a list of nine (9) evaluators proposed for removal from the *Evaluators Registry*, as a result of their lack of participation on site visit(s) and/or attendance at training workshops, which is required of all evaluators. The COCA referred this issue to the CCAT Committee for action. Based on a review of the list of names, which included recent invitations/correspondence from staff to each evaluator, and the criteria for removal from the *Registry*, staff was directed to proceed with the established process as stated in the *Evaluators Registry Guidelines*.

Staff informed the Committee of its plan to conduct a training webinar for new evaluator on September 22 and 23, 2010. A list of the nine participants was presented to the Committee for information. COCA staff facilitated the CCAT's third new evaluator training webinar on September 22 and 23, 2010. Nine evaluators registered for the program. Of the nine registrants, six completed the program and are now eligible to serve as trainees on a site visit team.

The CCAT Chair met with staff via a brief 15 minute conference call on November 1, 2010 to discuss the progress of the planning for the Evaluator Training Workshop. Staff gave an update noting that with the exception of two sessions, all speakers had been identified and confirmed as well as briefed on the expectations for their respective sessions.

May 2011 Report -

An informational report was given on the CCAT's biennial Evaluator Training Workshop held on January 15-16, 2011, at the Bally's Hotel in Las Vegas, Nevada. Themed, "Bridging the Gap: Achieving Consistency in Standards Review," the program focused on establishing consistency and reaching consensus in the standards review process. AOA President Karen J. Nichols, DO, during the welcome luncheon, delivered opening remarks highlighting her presidential theme of teamwork and the important role attendees play within the continuum of osteopathic medical education. AOA Trustee Norman E. Vinn, DO, was also in attendance. The participants attended three breakout sessions including:

- 1. Reaching Consensus: Skills that Make a Difference practical tips and techniques to become more effective at influencing team members towards consensus; productive and unproductive ways of disagreeing; and understanding individual differences using a four quadrant behavioral model.
- 2. Reaching Consensus and Establishing Consistency this session discussed difficult standards—those frequently cited as "Not Met," with the goal of examining divergent interpretations and reaching consensus. An audience response system was used to poll participants' findings.
- 3. What's In—What's Out?: A Review of the New and Revised Standards COCA Secretary, Konrad Miskowicz-Retz, PhD, CAE, discussed the new and revised standards that went into effect on July 1, 2010, and the role of the USDE in promulgating these revisions.

Day two of the program featured six breakout sessions that included: tips on writing effective reports, which was presented by guest speaker, Laurie McIntosh of Business Training Works, Inc.; a special session for team chairs that focused on the role and responsibilities of team chairs during the onsite visit as well as what to do when things go wrong on the visit; understanding financial statement; a review of standards domain five: Students, with the goal of developing recommendations for revisions to be submitted to the COCA's Standards Review Committee; a discussion about student and institutional assessment and how the data can be used to drive improvements; and lastly, the program closed with an open forum that gave participants an opportunity to bring their questions, concerns, and suggestion about the standards directly to COCA members and staff.

COCA Standards Review Committee (SRC)

August 2010 Report – there was no SRC report at this meeting

December 2010 Report - there was no SRC report at this meeting.

April – May 2011 Report – SRC met on April 19 and discussed the testimony given at the April 2 COCA Standards Forum and made its final recommendations to the COCA for consideration at the April 30-May COCA meeting.

COCA ad hoc Osteopathic Graduate Medical Education (OGME) Study Committee

At its December 2010 meeting, the COCA Chair announced he would appoint a 3-5 member *ad hoc* OGME Study Committee to study the issue of adequacy of OGME training positions, and to make recommendations on related changes in the standards and procedures for accreditation of COMs. The subsequent meetings of the ad hoc Committee took place via teleconference on March 7, March 28, April 25, and a dinner meeting at the O'Hare Hilton Hotel on April 29. The dinner meeting was attended by the COCA Chair and the Chair of the Standards Review Committee.

The March 7 meeting by teleconference began with a brief discussion of the charge to the committee from the COCA Chair. Next, a brief overview of policy statements previously issued by the AOA leadership and / or the leadership of the American Association of Colleges of Osteopathic Medicine (AACOM) on accreditation and OGME was followed by discussion. A summary of the current COCA standards that address OGME concluded the discussion of informational items. The committee members decided that they would proceed by analyzing documents and data regarding OGME and meet to discuss the issues over the next several months. The outcome of these meetings would be to produce document that summarizes the questions, issues, data, and provides recommendations to the COCA.

The March 28 meeting began with a reminder that recommendations from the ad hoc committee would be submitted to the COCA at its September 2011 meeting. An interim report would be presented to the COCA at the meeting on April 30-May 1, 2011. The committee members reviewed and discussed the data existent on OGME and addresses to the COCA by AOA Presidents. The ad hoc committee discussed the range of potential types of recommendations that it would be able to consider.

During the April 25 teleconference meeting, the Committee reviewed some of the existing data available in the Department of Accreditation and in the Department of Accreditation. Discussion of the initial report to COCA at its meeting on April 30 – May 1 followed.

The committee conducted a face-to-face meeting on Friday, April 29, 2011 at 6:00 PM CDT at the O'Hare Hilton, Chicago, IL. The meeting began with a discussion of the data that had been provided to the committee with recent updates. The data reviewed included a match summary of OGME and GME positions available to COM graduates, COM class size, and OGME positions in the COM affiliated OPTIs. The committee members also received a copy of the AAMC's "Results of the 2009 Medical School Enrollment Survey" which was distributed in April, 2010, and a similar study from AACOM.

Continuing Recognition of the COCA by the U.S. Secretary of Education

On May 1, 2006, the Honorable Margaret Spellings, Secretary of Education, granted five years of continuing recognition to the COCA. An interim report with changes approved by the COCA in its conflict of interest procedures in the COCA *Handbook*, and in its procedures stated in the *COM Accreditation Standards and Procedures* was submitted on December 7, 2006 and recommended for acceptance by the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its meeting held on May 30-31, 2007. On August 15, 2007 Secretary Spellings accepted the recommendation of the NACIQI that all issues had been satisfied.

The COCA staff submitted the current COCA petition for renewal of its recognition as a reliable accrediting agency on January 7, 2011. The work involved preparing narrative responses and attachments supporting the narrative. Some of the attachments were redacted for confidentiality reasons. On March 23, 2011, the COCA staff received the US Department of Education (USDE) draft staff analysis of the petition. The COCA staff submitted the response to the draft staff analysis on April 20, 2011. The USDE analyst attended and observed the April 30 – May 1 COCA meeting. The final staff analysis with a recommendation to grant continuing recognition for a period of five years, based upon a finding of no problems or issues, was received on May 17, 2011. The petition and USDE staff recommendation were presented to the NACIQI at its meeting on June 8-10, 2011. On June 8, 2011, the NACIQI voted to affirm the USDE staff recommendation that the USDE Senior Department Official, Assistant Secretary - Postsecondary Education Eduardo Ochoa, grant the AOA COCA the maximum five (5) years of continuing recognition with a finding of no issues.

RESOLUTIONS

This report is informational in nature; no resolutions are presented.