



EVALUATOR MANUAL

COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION



The **COCA** is the only accrediting agency for predoctoral osteopathic medical education, and is recognized by the United States Department of Education.

This document should be read in conjunction with the current revision of the Commission on Osteopathic College Accreditation's (COCA) Standards which may be found at <http://www.osteopathic.org/inside-aoa/accreditation/COM-accreditation/Pages/standards-of-accreditation.aspx>. Finally, the Association of Specialized and Professional Accreditors (ASPA) offers an informative, easy-to-follow overview of the accreditation process on its website at <http://www.aspa-usa.org/>. The website is a great resource for evaluators who are new to the accreditation process.

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Revised: May 2002; July 2004; April 2006; April 2009; December 2015; September 2017
COCA Approved: January 1999; August 2004; September 2006; December 2009; and October 2017 (EC)

Table of Contents

About the COM Evaluator Manual	4
Authority and Purpose	4
Accreditation and Higher Education	5
Overview of Accreditation Process	8
Accreditation for New and Developing COMs	9
COCA Substantive Change Policies and Procedures	13
Team Member Selection and Composition	14
Preparation for the Site Visit	15
Team Responsibilities	17
The Site Visit	18
Post Site Visit Process	21
Travel Arrangements and Reimbursement	21
Confidentiality and Conflict of Interest	23

About the COM Evaluator Manual

The *COM Evaluator Manual (Manual)* has been developed for use by each member of the Commission on Osteopathic College Accreditation's (COCA) *Evaluators Registry* in preparation for responsibilities as a site visit team member before, during, and after a site accreditation visit to a college of osteopathic medicine (COM). Team members are responsible for thoroughly reviewing and understanding the COCA's Standards and Procedures to assess the COM's compliance with them.

The *Manual* is intended to be a guide to new and experienced evaluators in the COM accreditation process. The *Manual* details the American Osteopathic Association's (AOA) policies and procedures for traveling to and from a site visit, meals and accommodations, and reimbursement. The *Manual* also describes the different types of site visits and how COCA staff schedules and plans each visit. Team responsibilities before, during, and after the site visit is also included.

Authority and Purpose

The AOA has a long history of accreditation of colleges of osteopathic medicine. As stated in the *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures*, "In 1952, the American Osteopathic Association was initially recognized by the United States Department of Education (USDE)." After 1960, the AOA Bureau of Professional Education (AOA Bureau) was organized as the accreditor for colleges of osteopathic medicine. In 2004, the former Council on Predoctoral Education was disbanded, and the AOA Bureau of Professional Education was restructured as the present 17-member Commission on Osteopathic College Accreditation (COCA). The COCA continues to be recognized by the USDE as the accreditor of colleges of osteopathic medicine.

USDE recognition establishes the COCA as an agency qualified to evaluate the quality of osteopathic medical education institutions and programs. The COCA must meet a set of rigorous criteria established by the Secretary of the USDE to hold this recognition. The USDE criteria require that, for purposes of recognition by the Secretary of the USDE, the COCA must provide continual assurance that the institutions and programs it accredits offer quality osteopathic medical education.

The COCA regularly reviews the accreditation standards and seeks feedback from the osteopathic community and public. Changes to the COCA standards are considered at a public hearing before the COCA makes a final vote for adoption. Once approved, new or revised standards are published in *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards*, which indicates when the changes become effective. Changes may be in response to revisions and requirements of the USDE Code.

The AOA's Commission on Osteopathic College Accreditation (COCA) accredits osteopathic medical education programs leading to the DO degree in the United States (programmatic accreditation). The COCA also accredits free-standing colleges of osteopathic medicine where no other educational program is offered (institutional accreditation) and serves as the federal

Title IV gatekeeper for those institutions. By assessing the compliance of osteopathic medical education programs based on the nationally accepted standards of the COCA, the interests of the public and the students enrolled in Colleges of Osteopathic Medicine (COMs) are served.

Accreditation and Higher Education

Overview of Accreditation

As practiced in the United States today, accreditation is a process by which institutions and programs voluntarily submit to an extensive peer-based evaluation of their compliance with accepted standards for educational quality. Higher education in the United States 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, signaling high quality and a commitment to excellence.

There are two distinct types of accreditation in higher education:

1. Programmatic (specialized and professional) accreditation conducts an in-depth assessment of specialized or professional programs at a college, university or independent institutions.
2. Institutional accreditation reviews academic and organizational structures of a college or university as a whole.

Through accreditation, the COCA provides assurance to osteopathic medical students and graduates, the medical profession, healthcare institutions, and the public that: (1) educational programs culminating in the award of the DO degree meet reasonable, generally-accepted, and appropriate national standards for educational quality; and (2) graduates of such programs have a complete and valid educational experience sufficient to prepare them for the next stage of their training. COCA standards for educational program quality are contained in the documents “Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards” and “Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards” available electronically from the website (www.aoacoca.org).

The American Osteopathic Association Commission on Osteopathic College Accreditation (COCA) is the only accrediting agency for pre-doctoral osteopathic medical education, and is recognized by the United States Department of Education (USDE). The COCA is recognized as both an institutional accrediting agency for free-standing colleges of osteopathic medicine and a programmatic accrediting agency for COMs that exist within larger institutions with a regional accreditor.

The COCA’s scope of recognition, as granted by the USDE, is “the accreditation and pre-accreditation (formerly “Provisional Accreditation”) throughout the United States of freestanding institutions of osteopathic medicine and osteopathic medical programs leading to the degree Doctor of Osteopathy or Doctor of Osteopathic Medicine. Title IV Note: Only freestanding schools or colleges of osteopathic medicine may use accreditation by this agency to establish eligibility to participate in Title IV programs.”

<https://ope.ed.gov/accreditation/ViewAgencyInfo.aspx?agencyId=6167656e637949643d3438267264743d382f312f323031372031313a33323a343420414d&tp=undefined>

COCA Mission, Goals, and Objectives

The COCA serves the public by establishing, maintaining, and applying accreditation standards and procedures to ensure that the academic quality and continuous quality improvement of the education delivered by the COMs reflect the evolving practice of osteopathic medicine. The scope of the COCA's work encompasses the accreditation of COMs.

Goal 1

To serve the public and interested communities (*e.g.*, colleges of osteopathic medicine, osteopathic medical community, *etc.*) by ensuring the continued effectiveness of the COCA.

Objectives:

1. Maintain an independent and objective accreditation process.
2. Inform the public and the communities of interest regarding the accreditation status of programs and institutions.
3. Develop and implement policies with integrity and high ethical standards.
4. Continue to seek the most cost-effective way to provide the services of the COCA.
5. Develop and disseminate information that demonstrates the effectiveness of the COCA's operations.
6. Maintain liaison between the COCA and its constituents.
7. Keep the community of interest informed of current trends and developments in specialized accreditation.
8. Serve as a resource on accreditation.

Goal 2

To develop, maintain, apply, and periodically review the COCA's accreditation processes and the accreditation standards for COMs.

Objectives:

1. Review COM programs and institutions and make accreditation decisions by COCA's standards and procedures.

2. Establish and disseminate standards, policies, and procedures for the COMs accredited by the COCA.
3. Comprehensively review the accreditation standards at least every five years.
4. Solicit suggestions from accrediting teams relative to standards, procedures, and processes.
5. Solicit suggestions from the community of interest relative to standards, procedures, and processes.
6. Identify competent individuals and provide appropriate training so they can participate in accreditation site visits.
7. Evaluate the performance of all evaluators and use the results of the evaluations to identify areas needing emphasis in the training process.
8. Monitor programs in the interim between site visits through the use of annual reports, mid-cycle reports, progress reports, interim progress reviews, and focused visitations.

Goal 3

To foster continuous quality improvement of osteopathic medical education by encouraging innovation and creativity in COM programs and institutions.

Objectives:

1. Communicate to the community of interest that the COCA encourages innovation and creativity in the COM.
2. Ensure that the policies and the procedures of the COCA do not inhibit innovation.
3. Ensure that the COCA and *Evaluators Registry* members perceive innovation as a necessary and positive approach to foster continuous quality improvement in osteopathic medical education.
4. Create standards which tie institutional planning to ongoing assessment of a COM's effectiveness.

Goal 4

To assure the continued effectiveness of the accreditation process by the development and application of continuous quality assurance, self-assessment, and external review of the COCA.

Objectives:

1. Maintain recognition by the USDE, by meeting all federal regulations for accreditation as found in the Code of Federal Regulations.

2. Seek external review by organizations that recognize accrediting bodies and follow accepted codes of good practice.
3. Engage in planning and conduct periodic self-assessments.
4. Evaluate and test the validity and reliability of the COCA's processes.
5. Maintain a committee structure that involves COCA members, and other experts in planning, quality improvement, and self-assessment.
6. Seek regular input from the community of interest relative to planning, quality improvement, and self-assessment.

Accreditation action taken by the COCA means a college or school of osteopathic medicine has appropriately identified its mission, has secured the resources necessary to accomplish that mission, shows evidence of accomplishing its mission, and demonstrates that it may be expected to continue to accomplish its mission in the future. Accreditation of a COM means that the COM incorporates the science of medicine, the principles and practices of osteopathic manipulative medicine, the art of caring and the power of touch within a curriculum that recognizes the interrelationship of structure and function for diagnostic and therapeutic purposes; recognizes the importance of addressing the body as a whole in disease and health; and recognizes the importance of homeostasis and self-regulation in the maintenance of health.

Overview of Accreditation Process

The Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards is comprised of 12 accreditation standards, each with an accompanying set of elements. All COMs that have attained accreditation status must meet the first 11 standards; standard 12 is applicable the only when COCA serves as the institutional accreditor for the COM. Each of the standards includes a concise statement of the principles that represent the standard. The elements of each standard specify the components that collectively constitute the standard; they are statements that identify the variables that the COCA considers in evaluating a medical education program's compliance with the standard. The standards are found at <http://www.osteopathic.org/inside-aoa/accreditation/COM-accreditation/Pages/standards-of-accreditation.aspx>

Within each standard, some elements are identified as "CORE elements." A CORE element is a critical component of the standard and assists in maintaining the educational quality of the program. Therefore, a COM's failure to meet a CORE element will affect the COM's accreditation status. The COCA will consider other non-core elements, which may affect a COM's accreditation status in the event of non-compliance.

In the event the COCA finds that a COM has failed to comply with any element, under USDE regulations, a COM must come into compliance within a 24-month period following the initial

finding of non-compliance. Failure to come into compliance within the 24-month period will result in an adverse accreditation action against the COM.

The COCA's determination as to whether a COM meets the standards and elements will result in one of the following accreditation decisions:

Accreditation with Exceptional Outcome: This indicates that all standards are compliant and all elements are met. For schools with this status, accreditation will be granted for ten years.

Accreditation: This indicates that all standards are compliant. However, there may be unmet elements that must be addressed via progress reporting. For schools with this status, accreditation will be granted for seven years.

Accreditation with Heightened Monitoring: This indicates that fewer than three standards are non-compliant and ongoing monitoring will occur via progress reporting. For schools with this status, accreditation will be granted for four years.

Accreditation with Warning: This indicates that between three and five standards are noncompliant and ongoing monitoring will occur via progress reporting. For schools with this status, accreditation will be granted for two years.

Accreditation with Probation: This indicates that more than five standards are non-compliant. For schools with this status, the accreditation will be granted for no more than one year.

Withdrawal of Accreditation: This indicates that the quality of the educational program is compromised and the school was unable to come into compliance with all standards within the allotted timeframe.

Additional information about the accreditation process and the standards and elements may be obtained from the COCA office (predoc@osteopathic.org) or the COCA website (www.aococa.org).

Accreditation for New and Developing COMs

New and developing COMs proceed through a three-stage process before reaching full accreditation:

1. Applicant Status
2. Candidate Status
3. Pre-Accreditation Status

Applicant Status

Applicant status is the initial step in seeking accreditation. This status is offered without rights or privileges of accreditation and does not establish or imply recognition by the COCA. Applicant

status is granted upon the formal request for evaluation submitted by the Chief Executive Officer of the applicant COM. Applicant status is not made public by the COCA and should not be advertised or publicized by the applicant status COM. A school at this stage should identify itself as “XCOM (applicant status – seeking accreditation).” The Applicant Status Request Form is to be completed and submitted to the COCA at least 36 months and no more than 60 months before the anticipated matriculation date of the first class of students. An application for Applicant Status must also be accompanied by a non-refundable application fee of \$6,000.

Candidate Status

Candidate status is the second step in seeking accreditation by an applicant COM and includes recognition by the COCA, with the COM’s status being publicly announced. Candidate status may be granted to COMs that demonstrate the planning and resources necessary to proceed to Pre-Accreditation Status within two (2) years.

An applicant for Candidate Status must submit a Candidate Status Self Study along with a Feasibility Study (Business Plan) that assesses the viability of the proposed new COM. The Feasibility Study (Business Plan) must be developed in partnership with a professional nationally known external business consulting firm. The COM Dean and the administrative team must play an integral role in the development of these documents. An application for Candidate Status must also be accompanied by a non-refundable application fee of \$36,000.

It is expected that a Dean will be hired at least 12 months before the submission of the Candidate Status documents and will provide the principal guidance and direction in the development of the COM through all steps of the Candidate Status process and beyond through Pre-Accreditation Status and into Accreditation. A change in the Dean during this period requires re-initiation of the Candidate Status application process.

It is also expected the Dean will hire qualified individuals at the Associate/Assistant Dean level to assist him/her in the development of the COM through Candidate Status and into Pre-Accreditation Status and ultimate progress to Accreditation. A minimum of two Associate Deans must be under contract with the COM before Candidate Status is granted.

The COM holding Candidate Status will not recruit, accept applications from, or admit prospective students. This means that a COM holding this status must not do any of the following:

- Use solicitation to recruit students;
- Solicitor collects application fees;
- Collect application information, including academic transcripts, Medical College Admissions Test (MCAT) scores, and letters of recommendation;
- Initiate the admission review process;
- Schedule interviews with any potential applicants;
- Offer advice on financial aid; and
- Issue letters of admittance into the COM.

Candidate Status Process

1. COM Submits Candidate Status Self-Study and Feasibility Study (Business Plan) and a Check for the \$36,000 non-refundable Application Fee
2. Staff Review
3. COCA Commission (or Executive Committee) Self-Study and Feasibility Study Review
4. Once all feasibility procedures are met based on paper submission, a Candidate Status Site Visit is authorized.
5. Escrow Contracts are developed.
6. Candidate Status Self Study, Site Visit Report, and Escrow Contracts are presented to the entire COCA for review
7. COM Testimony may be offered
8. Third Party Testimony may be offered
9. Decision by the COCA regarding the granting of Candidate Status; the Escrow Accounts must be funded before the granting of Candidate Status

Review of Candidate Status

Candidate Status will be reviewed annually via submitted written reports until the COM achieves Pre-Accreditation Status. If the COM has not been able to proceed to Pre-Accreditation Status within 24 months of the granting of Candidate Status, the Candidate Status will be withdrawn. A reapplication will require a new Candidate Status Self Study and Application Fee.

Pre-Accreditation Status

Pre-Accreditation Status may be granted to COMs who have achieved Candidate Status and meet the standards of Pre-Accreditation Status. To assure adequate self-study, timely consideration of information, and provide for faculty and administration development, an institution seeking COCA Pre-Accreditation Status must conform to these provisions. The COCA may not waive compliance with these procedures.

A COM should submit the Pre-Accreditation Self-Study and non-refundable application fee at least 18 months before the anticipated matriculation of the first class of students.

Upon the receipt of Pre-Accreditation Status, the COM will have the right and privilege to solicit applications and admit students, offer medical instruction within the approved osteopathic medical curriculum, and announce its Pre-Accreditation Status. Pre-Accreditation Status may not be designated as "Accreditation" until the COM has received "Accreditation" from the COCA.

A COM with Pre-Accreditation Status will be allowed to matriculate the first class at fifty percent (50%) of the approved class size and the second class at not greater than seventy-five percent (75%) of the approved class size. The third class may enroll not greater than one hundred percent (100%) of the approved class size.

In compliance with 34 CFR 602.16(a) (2), Pre-Accreditation Status will be for a period not to exceed five (5) years. Pre-Accreditation Status will be awarded to become effective no earlier than July 1 of the calendar year before the matriculation of the first class of students. If the COCA decides to award Pre-Accreditation Status at a meeting that occurs before the effective date specified above, the 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.”**

Pre-Accreditation Status Process

1. COM Submits Pre-Accreditation Self- Study
2. COM Submits Pre-Accreditation Application Fee of \$46,000 (non-refundable)
3. Pre-Accreditation Status Site Visit is conducted.
4. Pre-Accreditation Self-Study and Site Visit Report presented to COCA for review
5. COM Testimony may be offered
6. Third Party Testimony may be offered
7. Decision by COCA regarding Pre-Accreditation Status (right to recruit and enroll students)

Review of Pre-Accreditation Accreditation

Pre-Accreditation Status will be reviewed annually via submitted written reports until the COM achieves Accreditation. A site visit will occur during the first year of class offerings. If the COM has not been able to proceed to Accreditation status within five (5) years of the granting of Pre-Accreditation Status, the Pre-Accreditation Accreditation Status will be withdrawn. A teach-out agreement will then be initiated.

Accreditation Status

Accreditation Status is the highest level of accreditation awarded and confers all rights and privileges of accreditation. An educational program leading to the DO degree, once accredited, remains accredited until the program voluntarily terminates its accreditation status or the COCA terminates the program's accreditation through a formal accreditation action. Renewal of accreditation is subject to a site visit.

COCA Substantive Change Policies and Procedures

General Information

The COCA's review of any request for a substantive change is pursuant to 34 CFR 602.22. The COCA will maintain complete and accurate records of all decisions made regarding requests for substantive changes, including the correspondence that is significantly related to those decisions. A COM must receive prior approval from the COCA at least 120 days before the implementation of any substantive change. The COCA may approve a substantive change upon review of all criteria for the requested substantive change. The COCA must also determine that the substantive change will not adversely affect the COM's capacity to continue to meet the Continuing Accreditation Standards. A developing COM (i.e., a COM with pre-accreditation status) may not apply for a substantive change for at least one year after the graduation of the first class of students.

A COM may submit a request for the following types of substantive changes:

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

Questions regarding whether a proposed change qualifies as a substantive change or initial requests for a substantive change should be submitted on the Substantive Change Request Form to:

Secretary, COCA
American Osteopathic Association
142 E. Ontario St.
Chicago, IL 60611
Email: predoc@osteopathic.org

Substantive Changes Requiring Comprehensive Evaluation

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

1. Had its last comprehensive accreditation visit four (4) or more years ago;
2. Has received an accreditation status that included “with warning” or “with probation” within the last (5) years;
3. Had an approved substantive change - class size increase within five (5) years;
4. Had an approved substantive change - unplanned class size Increase within five (5) years;
5. Had an approved substantive change - branch campus within five (5) years; and
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 which undergoes a comprehensive site visit for purposes of evaluating a request for Substantive Change.

Information about requests for a substantive change may be found at <http://www.osteopathic.org/inside-aoa/accreditation/COM-accreditation/Documents/coca-substantive-change-processes-july-1-2017.pdf>

Site Team Member Selection and Composition

Ideally, site team selection typically begins three to four months in advance of a scheduled site visit. The criteria in selecting team members include an individual’s area of expertise, availability, geographical location, conflicts of interest, and level of experience. Site teams are comprised of individuals who have broad knowledge and experience in their particular area of expertise, higher education, and COM administration. The site team members are classified into the following categories:

Practitioner - an individual currently or recently directly engaged in a significant manner in the practice of the osteopathic profession.

Educator - an individual currently or recently directly engaged in a significant manner in osteopathic education in an academic capacity (e.g., professor, instructor, academic dean).

Academic - an individual currently or recently directly engaged in a significant manner in postsecondary teaching and research.

Administrator - an individual currently or recently directly engaged in a significant manner in a postsecondary program or institutional administration.

For pre-accreditation and comprehensive site visits, the team is usually comprised of evaluators in the following categories:

1. Team chair (1)
2. Administrator (1)
3. Academic (1or2)
4. Educator (1)
5. Osteopathic practitioner (1),
6. Evaluator trainee (if applicable)
7. COCA staff member (1or2)

For focused or interim progress review site visits, the site team has fewer members, usually comprised of two to three evaluators, depending on the nature of the requirements or standards to be reviewed, and a COCA accreditation staff member.

Preparation for the Site Visit

Self-Assessment Process and the Self-Study Document

The primary purpose of the self-assessment activity and culminating self-study report is to enable COMs to devise a system for **self-appraisal** and **improvement** consistent with both the COM's mission and the COCA's standards and procedures. Self-appraisal involves a collaborative process with all areas of the COM to identify the strengths and weaknesses within the COM. In turn, the COM can then use the self-assessment process and its results as tools for continuous, on-going assessment and improvement. This process is one that provides both summative and formative evaluation.

COMs must submit their self-study report at least 60 days before any schedule site visit (comprehensive, focused or pre-accreditation). The self-study report is an integral part of the site visit process and is used throughout the site visit and review process. Accreditation staff will utilize the self-study report to develop the site visit agenda.

Scheduling the Site Visit

Site visits are scheduled in advance and, depending upon the type of site visit that is required, a site visit may be scheduled as far in advance as two years. For example, pre-accreditation site visits are scheduled at least six months prior to the opening of a newly pre-accredited COM, and another focused site visit is scheduled six months after operations begin to review the progress of the pre-accredited COM during its first year of operation. Interim progress reviews and focused visitations may be scheduled on an as-needed basis. Once the COCA determines that a site visit is necessary, the COM will be notified in writing of the site visit. Within 30 days from the date of the notice, the COCA staff will contact the COM to propose site visit dates and confirm the date of submission of the self-study.

Once the date of the visit has been established, accreditation staff will develop a proposed list of visiting team members, compiled from the evaluator registry. The list of proposed team members is submitted to the COM for approval. A COM must have good cause to object to inclusion of any particular individual on a site team. The COCA Secretary will review the COM's objection and make the final determination as to whether the subject evaluator is to be

included in the proposed site team. Accreditation staff will contact each team member, to determine his/her availability. If there are vacancies on the site visit team, the staff will select the next potential site team member from the registry and present that individual to the COM. This process is repeated until all team members have been approved and his/her availability is confirmed. When an evaluator accepts a visit, he/she must be available to attend the entire visit.

After the COM has confirmed the team, accreditation staff will send a confirmation letter that details the team members' areas of responsibility and initial travel guidelines. Team members will receive access to the COM's self-study report, annual report, and other applicable material filed in COCA-Online.

Accreditation staff will develop the site visit agenda with the team chair's oversight. When the draft agenda has been completed and receives approval from the team chair, it is forwarded to the COM for its review and approval.

Pre-Site Visit Material

Once the site visit team has been composed, team members will receive pre-site visit materials for COMs undergoing comprehensive, pre-accreditation or focused site visits. This material includes:

1. COM's self-study report (accessible on COCA-Online)
2. Annual report (accessible on COCA-Online)
3. Previous site visit reports
4. Progress reports associated with outstanding requirements
5. Site visit agenda
6. Expense voucher
7. Travel information for arranging transportation
8. Information regarding ground transportation
9. Other material as may be deemed necessary

Team Member Preparation

Each team member is expected to thoroughly review all materials provided by the accreditation staff before the site visit. These materials, along with the COM's self-study report (if appropriate), will be submitted via COCA On-line to the team chair as soon as practicable and before the site visit, in preparation for developing the site visit agenda. Site team members may request from the accreditation staff other materials they deem relevant to the site visit. Before and after the site visit, staff will convey information about the visit to team members. Because all communication occurs through COCA On-line, it is important members of the team regularly monitor their COCA On-line account and respond to staff promptly. A telephone number should also be provided to the accreditation staff.

Team Responsibilities

1. Exhibit professionalism at all times
 - ☞ Accept the invitation to serve on the team readily and begin preparations
 - ☞ Routinely monitor e-mail for communications from staff and other members of the team and respond to inquiries promptly
 - ☞ Review the agenda; prepare ahead for an effective and efficient visit
 - ☞ Protect confidentiality of the COM, before, during, and after the visit; return documents, notes, etc., to team secretary or destroy them before departing the COM; delete any documents that were created on the COM's computers
 - ☞ Avoid discussing findings with COM personnel except for those communicated in the executive session and exit conference
 - ☞ Review the accreditation standards in entirety and focus on the assigned standards for their respective area of review
 - ☞ Review all pertinent documents (e.g., self-study report, prior site visit reports, progress reports, annual reports, etc.)
 - ☞ Dress in business attire
 - ☞ Begin and end meetings promptly according to the agenda
 - ☞ Exhibit collegiality with teammates and representatives of the COM
 - ☞ Promote and maintain peer review perspective
 - ☞ Maintain objectivity, consider all perspectives, base conclusions on evidence
 - ☞ Exercise judgment to build team consensus when making decisions on compliance

2. Practice effective interviewing techniques
 - ☞ Formulate and review questions before the interview
 - ☞ Identify ahead of time the specific individuals to whom the questions will be posed
 - ☞ Allow the interviewee to talk for the majority of the time
 - ☞ Engage in effective listening to responses to questions
 - ☞ Provide the opportunity for the interviewee to describe the goals of the COM and the strengths and weaknesses in meeting the goals
 - ☞ Ask questions that will corroborate documentation submitted in the self-study
 - ☞ Request clarification on issues of concern
 - ☞ Practice objectivity at all times during the interview process
 - ☞ Acknowledge the autonomy of the COM in developing policies and procedures required to meet its (individual) mission and comply with the accreditation standards
 - ☞ Allow enough interview time to elicit responses that provide all information necessary to determine compliance with the standards under review

3. Participate willingly in team planning and discussions
 - ☞ Participate in team discussions during the site visit
 - ☞ Listen to all team members' reports on information gathered

- Review preliminary conclusions from current findings
 - Request additional interviews, if necessary
 - Request additional documents for review and corroboration, if necessary
 - Build consensus – work to develop agreement on findings and compliance with standards
 - Stay objective; support the peer review process
 - Alert the team chair of issues requiring attention
4. Apply skilled approaches to communication – writing the report
- Develop well-written findings that support in detail any requirements that are recommended for any unmet standards or elements
 - Consult with team secretary for questions on format
5. Disclose any actual potential conflict of interest as described in the COCA Conflict of Interest policy

The Site Visit

The Site Visit

The evaluation process for continuing COMs (fully accredited) or pre-accredited COMs (operational but not having graduated its first class) includes the submission of a self-study, site visit, and the COCA’s review of the self-study and site visit report.

A comprehensive site visit for continuing COMs or pre-accredited COMs typically requires two to three days to complete. A one - two-day site visit is typically scheduled for focused or progress report visits. The length of the visit may vary based on other factors that are present.

Site visit teams are comprised of the following categories of evaluators:

- Administrators
- Educators
- Academicians
- Osteopathic Medical Practitioners

A site visit team may also include a site visit evaluator trainee and an observer when appropriate. Observers may, upon formal request and approvals by the COCA Secretary, accompany site visit teams. Observers on a site visit may also include representatives from the U.S. Department of Education, state higher education regulatory agencies, and other accrediting agencies. Costs incurred by these observers will be paid by the observer’s organization.

Reviewing Accreditation Standards

Each site visit team member must thoroughly review and understand the COCA standards and procedures to accurately and consistently assess the COM’s compliance with the standards. A

copy of the Standards may be found at <http://www.osteopathic.org/inside-aoa/accreditation/COM-accreditation/Pages/standards-of-accreditation.aspx>

Team Planning Session

The accreditation staff will schedule and coordinate a team planning session to be led by the site visit team chair. During the session, the site visit team chair will discuss the purpose of the visit based on the documents reviewed in the agenda materials and will also discuss any continuing requirements from a previous site visit. The team will also begin to determine what questions and issues it will discuss during the interview phase of the site visit. The process serves to provide an opportunity for the team to develop consensus, review the COM's compliance with requirements and standards and to anticipate other potential issues while on site.

COCA On-Line

COCA-Online is the repository for all information about the COM including the self-study, evidentiary submissions supporting the self-study, appendices, annual report, and other pertinent information. The accreditation staff will coordinate the site visit team's access to the COM's submission in COCA-Online 30 days in advance of the site visit. A site team member should complete only the sections assigned to that team member. When reviewing documents in COCA-Online, site team members should find specific evidence to determine whether the COM complies with the standards being reviewed by that team member.

The Entrance Interview

The entrance interview will occur during the first day of the site visit where introductions are made between the COM officials and the site visit team.

Daily Review

Throughout each day of the site visit, the site visit team will have several opportunities to discuss the findings based on the interviews and to identify areas requiring additional review.

Team Discussions - Building Consensus

The agenda will include time for the team to discuss issues that must be addressed as a result of the day's interviews. Team members may confer with other members and the team chair to share and consider each other's perspectives on an issue, determining whether further review is required.

Once all interviews have been concluded, team members should discuss their findings in each of the areas reviewed, based on the interviews and the documents reviewed. Throughout this discussion, the current findings are compared to the requirements and standards that are the focus of the site visit.

When site visit team members overlap in their review of a COM's compliance with the standards and elements, the site visit team members' findings should be based on a consensus decision. Once the team has reached its conclusions, each team member must draft the specific section of

the report that addresses the current findings for the standards and elements reviewed by that team member.

Team Dinner

The team dinner provides an opportunity for team members to interact in a social setting. Team dinners do not include any COM officials. Because team dinners are usually held in a public setting, the team should refrain from discussing its findings. Time for team discussion at the COM campus is built into the schedule.

From Individual to Team Report

Before completing the site visit report, each team member must have a clear understanding: 1) as to whether or not the COM complies with the standards based on the site visit; and 2) of the requirements that will be necessary to bring the COM into compliance with an unmet standard.

From this understanding, each site visit team member must document the COM's non-compliance through detailed factual findings that support the necessity of the requirements. While each team member prepares individual sections assigned to the team member, the complete report must be produced following a consensus of the whole, prepared by the team as a whole. It is the responsibility of the team chair to build consensus when differences exist regarding either any of the findings or conclusions.

At the conclusion of the report-writing segment of the schedule, all team members will convene to review each section of the report together. The team chair leads and oversees this activity. It is important at this point in the process that: 1) the team has an overview of how the report will reflect the team's findings and requirements to ensure that the focus of the report is appropriate for the visit conducted; 2) all necessary accreditation standards have been reviewed; and 3) the report is clear in reporting the status of the COM's compliance with the standards.

Gifts to Site Visit Team Members

Gifts to site evaluators are not allowed. The COCA understands that a COM may wish to impart nominal gifts of hospitality (e.g., snack bags, water, COM mementos, etc.). While the COCA does not encourage any gifts, a COM may choose to convey nominal hospitality gifts not to exceed \$25 in value. A gift exceeding this value may not be accepted by the site evaluator. A violation of this provision may result in the site evaluator's removal from the site evaluator registry.

Exit Conference

The exit conference is the final meeting of the site visit. This meeting provides an opportunity for the team to thank the COM for its hospitality and review all subsequent accreditation processes. The COM should understand that following the visit, the COCA will provide the institution with a draft report, and the institution may suggest errors in fact within the document.

During the exit conference, the team does not address questions or comments from the COM regarding the draft site visit report. Questions or comments on the draft report should be submitted to COCA staff as part of the COM's formal written response to the draft report.

Post Site Visit Process

Following the site visit, the team chair, in cooperation with the team members, is responsible for reviewing and revising all segments of the site visit report. The team chair will submit the draft report through the COCA-Online platform. The accreditation staff will, in turn, forward the report to the COM for review for accuracy of the factual information contained in the report. Within 30 days of receipt of the report, the COM may submit a response to the report addressing any factual errors contained in the draft report. Following receipt of the COM's comments, the draft report is scheduled for review by the COCA at its next regularly scheduled meeting.

Site visit team members must submit their expense vouchers to COCA via predoc@osteopathic.org within two weeks of the conclusion of the site visit. The AOA will process the reimbursement in a timely fashion. Any vouchers submitted later than two weeks may only be approved upon the discretion of the COCA Secretary.

Review by the COCA and the Role of the Team Chair

The COCA will review the draft report and the COM's response at its next regularly scheduled meeting. It is the responsibility of the site visit team chair to present the report to the COCA and to answer any questions the COCA may have to clarify the information presented in the report. If the team chair is unavailable to present the report to the COCA, another team member may present the report and its recommendations. While not required COM representatives may also present the COM's position at the meeting to respond to the findings in the site visit report.

The COCA will adjudicate the findings and recommendations contained in the site visit report, taking into consideration the COM's response and any documentation submitted in support of the response. The COCA's adjudication will result in an accreditation decision and the COM will be notified in writing of the COCA's decision following its review within 30 days of the decision.

Travel Arrangements and Reimbursement

Travel Planning

All site visit team members are responsible for making their travel arrangements to the site visit location. You may use any travel agency or online travel vendor to select your flight. Guidelines for travel arrangements:

- When making travel arrangements, it is important to note that for comprehensive and pre-accreditation site visits, the team (typically) arrives at the location of the COM on the afternoon or evening before the first day of the site visits, unless otherwise noted in the

confirmation letter. Team travel arrangements for progress reviews and focused visitations may be different; team members should read their confirmation letter carefully before making their travel arrangements.

- Travel arrangements should be made as early as possible following confirmation of an evaluator's participation in the site visit.
- Direct, non-stop flights should be purchased whenever possible to avoid connection delays.
- Before making any travel arrangement, please verify the COM's designated airport as this is where ground transportation to the hotel will be provided.
- The COCA's reimbursement for mileage for driving to a site visit may not exceed a regular roundtrip coach airfare.
- After the site visit, if you are traveling to an alternate location, the COCA will not reimburse you more than a round trip, coach fare to the COM's location.
- You may delay your departure from the site visit airport provided it does not result in an increased fare.
- The COCA will not pay for first class or upgraded seats.
- The COCA will pay for one checked bag.
- The COCA will not pay for canceled flights, rebooking fees, or change fees.
- Airline costs may be submitted with your expense voucher for processing by the COCA.
- Once the evaluator completes his/her reservation, a copy of it should be forwarded to the team secretary for inclusion into the site visit materials.
- The COM will make hotel arrangements for site visit team members.
- Rental cars may not be used unless prior approval is received from the COCA Secretary.

Hotel Accommodations

The COM is responsible for making hotel arrangements for all members of the team. COMs are directed to have hotel room costs directly billed to the COM. Team members should check on this arrangement at the time that they check in at the hotel. Incidentals, such as snacks or breakfast, may be billed to the team member.

Meal Arrangements

Depending on whether or not the host hotel provides breakfast, the COM may provide breakfast and lunch for the team in a private setting during the site visit. The COM will provide lunch for those team members who are on site. Team members should inform the team secretary of any special dietary requirements. The team secretary will make dinner arrangements for the team, if necessary.

Reimbursement Policies

AOA reimbursement policies provide for reimbursement for each day of the site visit and any travel days to and from the site visit. An honorarium is provided for each team member for each day of the site visit, including travel days. The COCA follows the AOA policy on per diem for meals at \$110 per day. Other reimbursable expenses include costs for ground transportation, parking, tolls, etc. AOA reimbursement policies prohibit reimbursement of expenses over \$25.00 without a receipt. An expense voucher will be included with the site visit materials.

Evaluators must submit their expense voucher, along with any relevant receipts, to the Accreditation Department within 30 days of the site visit.

Confidentiality and Conflict of Interest

Confidentiality of Information Collected During the Accreditation Process

The purpose of accreditation is to protect the public by advancing the quality of osteopathic medical education. Accreditation information is submitted to or generated by the COCA with the expectation of confidentiality. All information collected from the COMs is held in strict confidence by the COCA staff, commissioners, and evaluators.

A site team may not disclose any information regarding the site visit or any information regarding the accreditation status of a COM unless authorized to do so.

Except for the information that is presented in open sessions of the COCA, members of the COCA and site visit team members are not authorized under any circumstances to disclose any information obtained during site visits.

With the exception of the reporting required by the Secretary of the U.S. Department of Education, it is the obligation of the COCA to maintain the confidentiality of its relationships with COMs and not to announce publicly any action with respect to a COM other than its accreditation status, including public probationary status, or its removal from the accredited list.

Conflict of Interest

This policy statement governs the treatment of actual, apparent, and perceived conflicts of interest and appearances of conflicts of interest that may arise during the deliberations and actions of the COCA. This policy is intended to facilitate the disclosure and resolution of conflicts of interest. These policies apply to members of the COCA, the COCA Appeals Panel, COCA staff, and members of the evaluator registry participating as site visit team members.

When considering a conflict of interest, the COCA's policy is to err on the side of caution to safeguard the integrity of the COCA's processes. Members of the COCA, the COCA Appeals Panel, the evaluator registry, and COCA staff should be sensitive not only to the existence of a conflict of interest but also to any appearances of a conflict of interest even when no actual conflict may exist.

The accreditation staff will collect conflict of interest disclosure statements from COCA commissioners, Appeals Panel members, members of the evaluator registry, and administrative staff.

What is a Conflict of Interest?

A conflict of interest arises where an individual on the COCA, COCA staff, or a member of the evaluator registry participating as a site visit team member may be unable to act based solely on an objective analysis of the information presented, due to a financial, personal or other relationship with an entity under consideration, or an expression of bias/prejudice. The presence, or even the perceived presence, of a conflict of interest, suggests that the conflicted individual may not have acted consistently with the legal duties of loyalty and obedience.

This, in turn, raises the question whether the COCA's discussion and the eventual decision may have been influenced by factors other than the information presented to the COCA. For example, bias may be present from consideration of information that is not entered into the record but is known only to one or more members of the decision-making body. More seriously, prejudice, a literal pre-judgment in advance of the proceeding itself, may have occurred with one or more members of the decision-making body. In the event a COCA decision is challenged, courts will, typically, grant considerable deference to the professional judgment used to reach substantive decisions made by private accrediting and certifying agencies. Where a court is reviewing the COCA's decision, the presence of bias and prejudice or the failure to follow the defined procedures for handling conflicts of interest may provide the basis for overturning the decision of the accrediting or certifying body. Therefore, identifying and resolving conflicts of interest early in the process inures to the benefit of the COM, the COCA and all stakeholders in the review process.

What Circumstances Create a Conflict of Interest?

In simplest terms, a conflict of interest arises when an individual member of a bureau, council or committee may be influenced by her or his decision-making process due to a relationship with individual or entity under consideration.

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

1. A business or financial relationship with an individual or program under consideration
2. A direct familial relationship with an individual under consideration or with an officer of an entity under consideration
3. Employment or consulting (past or current) relationship with an entity under consideration
4. Employment or other relationship with a competitor of a program under consideration

No COCA representative (defined as a member of the COCA, the accreditation staff, the evaluator registry, or the Appeals Panel) may participate in a site visit, in discussions or voting at COCA meetings, or in an appeal if the program being visited or discussed is:

1. One in which the representative or an immediate family member (defined as a spouse, life partner, child, parent, or sibling) has been connected as a student, graduate, faculty member, administrative officer, staff member, employee, or contracted agent within the past five years;

2. Located in the same state as the COM or institution of the representative, or in such close geographic proximity that the programs or institutions involved can reasonably be considered as competing with each other for financial advantage (for example, in the operation of hospitals or clinics operated by the programs);
3. Part of a university system where the representative is employed;
4. Engaged in substantial cooperative or contractual arrangements with the program or institution of the representative or an immediate family member;
5. One which has engaged the representative or an immediate family member as a paid consultant within the past five years. Provision of short-term educational services (such as guest lectures) is not considered consulting that poses a conflict of interest;
6. One in which the representative or an immediate family member has any financial, political, professional, or other interest that may conflict with the interests of the COCA;
7. One in which the representative believes that there may be a conflict due to other circumstances, such as participation in accreditation or review of the program for other agencies, close personal relationships with individuals at the program, etc.;
8. One in which the program has reason to believe, and can document to the satisfaction of the COCA Secretary, that the participation of the representative could be unfairly prejudicial.

The determination that a conflict of interest exists and the resolution of existent conflicts of interest rest with the COCA, and not with the individual member. Ordinarily, this decision will be made by the COCA Executive Committee. However, upon request from any voting member of the COCA, the decision that a conflict of interest exists will be subject to debate and decision by the voting members. The individual member under discussion will have the right to respond regarding the alleged conflict but will be recused from deliberating and voting on the determination as to whether a conflict exists. Affected COMs also have the right to raise a question of conflict of interest as to these groups before the entire COCA for determination and resolution.

Consultations

No COCA commissioner or member of the evaluator registry will act as a paid or unpaid external consultant on COCA accreditation matters to any program or institution subject to COCA accreditation. A COCA site visit team member will not act as a consultant on accreditation matters to a school the evaluator has visited as a site visit team member within the past five years.