Accreditation of Colleges of Osteopathic Medicine: COCA Substantive Change Policies and Procedures

Effective for reviews submitted on or after July 1, 2017

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# Table of Contents

1. General Information
2. Substantive Changes Requiring Comprehensive Evaluation
3. Change in Educational Mission or Objectives of the Institution
4. Change in the Location of the Institution
5. Change in Legal Status, Form of Control, or Ownership of the Institution
6. Change in Curriculum/Change in Curriculum Length
7. Change in Hour Calculations
8. Additional Location
9. Branch Campus
10. Transition from a Branch Campus to an Independent COM
11. Contracting with a non-Title IV Eligible Institution for 25% to 49% of a Program
12. Acquisition of Any Other Institution or any Program or Location of Another Institution
13. Addition of a Permanent Location at which a Teach-out is Being Conducted for Students of Another Institution That Has Ceased Operations
14. Planned Increase in Class Size
15. Unplanned Increase in Class Size
16. Appendix A: Pre-Operational Site Visit
General Information

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 Substantive Change is any modification in a college of osteopathic medicine’s (COM) operations, governance, or legal status that could impair the COM’s ability to continue to meet the COCA’s 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 described in 34 CFR 602. If a COM wishes to implement a Substantive Change, the COM must receive prior approval from the COCA at least 120 days before the implementation of the Substantive Change, or within the time frame as described under each change below. The COCA will approve a Substantive Change when the criteria for the requested change have been met and the COCA determines that the change will not adversely affect the capacity of the COM to meet the Continuing Accreditation Standards. The COCA will not review a Substantive Change for a New and Developing COM until at least one year after graduation of the first class of students.

Substantive Changes that require the COCA will review approval are include:

1. Any change in the established mission or objectives or location of the institution;
2. Change in the location of the institution;
3. Any change in the legal status or form of control of the institution;
4. Addition Change of instruction or an increase or decrease in the length of curriculum 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. 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;
11. Transition from a Branch Campus to an independent COM; and
12. Any anticipated or unplanned increase in class size.

The COCA may consider simultaneous substantive change requests submitted at the same time but
will not consider a new request when another request is under review.
The COCA will not consider applications from COMs with a current accreditation status of Accreditation with Heightened Monitoring, Accreditation with Warning, Accreditation with Probation, or Withdrawal of Accreditation for any of the following substantive changes:

1. Additional location
2. Branch campus
3. Acquisition of any other institution, or program or location of another institution
4. Addition of another location at which a teach out is being conducted
5. Planned Class Size Increase

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 four or more years ago;
2. Has received an accreditation status that included “with warning,” “with probation,” or “heightened monitoring” 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 seven (7) years;
5. Had an approved Substantive Change-Branch Campus within five (5) years; and 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 which undergoes a comprehensive on-site visit for purposes of evaluating a request for Substantive Change.

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

Secretary, COCA
American Osteopathic Association
142 E. Ontario St.
Chicago, IL 60611
Email: predoc@osteopathic.org
Change in Educational Mission or Objectives of the Institution

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

Timing
Application must be reviewed by the COCA at a meeting held at least 120 days prior to when the anticipated change would become effective. Application materials for a request in educational mission or objectives must be submitted at least 90 days prior to the COCA meeting where the Substantive Change request will be addressed.

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

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

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

1. Element 1.1: Program Mission
2. Element 1.2: Strategic Plan
3. Element 3.1: Financial Resources
4. Element 4.1: Facilities
5. Element 7.1: Faculty and Staff Resources and Qualifications
6. Element 6.1: Curriculum Design and Management
7. Element 9.1: Admissions Policies
8. Element 11.1: Program Assessment

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

Definition
Any relocation of the COM that involves a change in the facilities previously reviewed by the COCA will be considered a change in location. A change in clinical training sites will not be considered a substantive change and will be reviewed through the continued accreditation standards.

Timing
A request for a change in the location of the institution must be submitted to the reviewed at a COCA meeting in the calendar year prior at least 18 months prior to the anticipated move. Application materials must be submitted at least 120 days prior to the COCA meeting where the Substantive Change request will be addressed.

Application
A request for a change in an institution’s location must provide documentation that describes the following:
1. Appropriate charters, licenses, or approvals required to function if location is moved to a new jurisdiction;
2. The new facilities including a building and/or remodeling plans, project budget, and completion timelines;
3. Budget for move and other related expenses;
4. Impact on the recruitment plan;
5. Impact on the currently enrolled students;
6. Impact on the existing faculty;
7. Impact on the clinical education program; and
8. Governing body discussion and approval of the proposed change.
9. Submit a certificate of occupancy for the new location at least 6 months prior to beginning instruction at the new facility
9. Facility and faculty contingency plan if the new facilities are not ready by TBD

The Change of Location of an Institution self-study may include the following elements:
Depending on the nature of the requested change, a self-study may be required demonstrating compliance with the following Continuing Accreditation elements:

1. Element 1.2: Strategic Planning
2. Element 1.3: Licensing and Regional/Institutional Accreditation
3. Element 3.1: Financial Resources
4. Element 3.2: Financial Planning and Budgeting
5. Element 3.4: Financial Audit
6. Element 4.1: Facilities
7. Element 4.2: Security and Public Safety
8. Element 4.3: Information Technology
9. Element 4.4: Learning Resources
10. Element 6.9: Clinical Education
11. Element 6.10: Clinical Experience
12. Element 6.11: Comparability Across Clinical Education Sites
13. Element 7.1: Faculty and Staff Resources and Qualifications
14. Element 9.8: Mental Health Services
15. Element 9.9: Physical Health Services

Site Visit

A pre-operational focused site visit to the new location will occur prior to the opening of the new location. The review of the substantive change request by the COCA will be conducted not less than six (6) months prior to the opening of the new location. See Appendix A.

Monitoring

Monitoring will occur as part of the routine annual reporting to the COCA. In addition, the COCA may require a progress report, student survey, or a focused site visit.
Change in Legal Status or Form of Control or Ownership of the Institution

Definition
Any change in ownership, move between public and private, or change in business status between non-profit and for-profit will be considered to be a change in legal status. A merger with another institution will also be considered in this category.

Timing
A request for a change in legal status, form of control, or ownership of the institution must be reviewed at a COCA meeting. Application should occur at least 120 days prior to when the requested change will occur. Application materials must be submitted at least 60 days prior to the COCA meeting where the Substantive Change request will be addressed.

Application
A request for a change in an institution’s legal status or form of control or ownership must provide documentation that describes the following:

1. Governing body decisions and approval of the proposed change;
2. New or amended Articles of Incorporation;
3. New or revised governing body bylaws;
4. New or revised organizational chart;
5. Announcement of the proposed changes to students, faculty, staff, alumni, the public;
6. Operating pro forma budget (pro forma) for the next 5 years and 3 years audited financial statements for the new ownership

The Change in Legal Status or Form of Control self-study will include the following Continuing Accreditation elements:

1. Element 1.2: Strategic Plan
2. Element 1.3: Licensing and Regional/Institutional Accreditation
3. Element 1.4: Governance & Program Policies
4. Element 1.5a or 1.5b: Non-Discrimination
5. Element 1.5b: Non-Discrimination for Faith Based Institutions
6. Element 1.7: Clinical Education Affiliation Agreements
7. Element 3.1: Financial Resources
8. Element 3.2: Financial Planning and Budgeting
9. Element 7.1: Faculty and Staff Resources
10. Element 7.7: Faculty Association
9-11. Element 7.8: Faculty Appointment and Advancement
Monitoring

The COCA will conduct a comprehensive site visit to an institution that has undergone a change of control as soon as practicable, but no later than six (6) months after the change of ownership.

Additional monitoring will occur as part of the routine annual reporting to the COCA. In addition, the COCA may require a progress report or student survey.
Change in Curriculum / Change in Curriculum Length

Definition
A substantive change in curriculum / curriculum length will be considered when a comprehensive change in the curriculum is planned or occurring, which means a significant departure from the existing curriculum content, length, or method of delivery. A substantive change is NOT merely a modification made to the curriculum as part of the routine curricular evaluation and assessment / improvement process.

Timing
A request for a change in curriculum should be reviewed at the April COCA meeting and occur in the calendar year prior to the desired change. Application materials must be submitted and at least 6 months prior to the COCA meeting where the substantive change will be addressed.

Application
A request for a change in curriculum must provide documentation that describes the following:

1. The proposed curriculum change;
2. Analysis of additional resources—financial, facility, and faculty resources needed for the curriculum change;
3. Curriculum Committee discussion and approval; and
4. Faculty governance discussion and approval.
5. Changes needed in recruitment, academic counseling, and career counseling.

Depending on the scope of the change requested, the Change in Curriculum / Curriculum Length application may include self-study demonstrating compliance with the following Continuing Accreditation elements:

1. Element 3.1: Financial Resources
2. Element 3.2: Financial Planning and Budgeting
3. Element 3.4: Financial Audit
4. Element 4.1: Facilities
5. Element 4.3: Information Technology
6. Element 4.4: Learning Resources
7. Element 6.1: Curriculum Design and Management
8. Element 6.2: Programmatic Level Educational Objectives
9. Element 6.3: Maximum Length of Completion
10. Element 6.4: Osteopathic Core Competencies
11. Element 6.5: Scientific Method
12. Element 6.6 Principles of Osteopathic Medicine
13. Element 6.7: Self-Directed Learning
14. Element 6.8: Interprofessional Education for Collaborative Practice
Monitoring

All monitoring will occur as part of the routine annual reporting to the COCA. In addition, the COCA may require a progress report, student survey, or a focused site visit.
Change in Hour Calculations

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

Timing
A request for change in hour calculation Application should must be reviewed at the April COCA meeting in the calendar year occur at least prior to when the desired change will occur. Application materials must be submitted at least 60 days prior to the COCA meeting where the substantive change request will be addressed.

Application
A COM requesting to change from clock hours to credit hours or vice versa must provide documentation that describes the following: detailed description as to why the COM is making the change, approval from the COM’s regional or institutional accreditor, if not institutionally accredited by the COCA.

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

A Change in Hour Calculation self-study will be required demonstrating compliance with the following Continuing Accreditation elements:

1. Element 1.3: Licensing and Regional/Institutional Accreditation
2. Element 6.1: Curriculum Design and Management
3. Element 9.2: Academic Standards
4. Element 11.1: Program Assessment

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

This policy will be posted for public comment at a later date.
Branch Campus

This policy will be posted for public comment at a later date.
Transition from a Branch Campus to an Independent COM

This policy will be posted for public comment at a later date.
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 a contract under which an institution or organization not certified to participate in Title IV or HEA programs offers between 25% and 49% of the COM’s educational program.

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

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

Timing: As per substantive change requested.

Application 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 days prior to the COCA meeting where the substantive change will be addressed.

Application and Monitoring:
The criteria for evaluation are those as established for Substantive Change– Curriculum and Substantive Change– Additional Location, depending on the nature of the agreement.

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

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

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 document 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. 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 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.
Acquisition of Any Other Institution or any Program or Location of Another Institution

Definition

A COM that seeks to acquire another COM or merge with another COM, must submit written notification to the COCA of its intention to establish such an acquisition at least (18) months prior to the desired date of offering instruction at the acquired programs.

Timing: As per substantive change requested.

Application must be reviewed at a COCA meeting occurring at least 24 months prior to the desired date of offering instruction at the acquired programs. Application materials must be submitted at least 90 days prior to the COCA meeting where the substantive change will be discussed.

Application and Monitoring:

Application

The request for acquiring another institution or program must include documentation that describes the following:

1. An introduction to the COM requesting to make the acquisition, including history and mission;
2. An introduction to the program/institution being acquired, including history and mission;
3. Details on all educational programs provided at each institution, including programmatic and institutional accreditations;
4. The need for acquiring a new institution/program;
5. The curriculum to be provided by the new combined program/institution;
6. The facilities at which the combined program curriculum will be provided;
7. The faculty that will providing instruction at the combined institution;
8. How this change will impact the acquiring COM's curriculum;
9. How this change will impact students, faculty and staff at both programs/institutions;
10. How the curriculum provided by the new combined program/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 site visit (with required self-study) to the site contracted to acquiring the osteopathic medical education program.

A pre-operational focused site visit report will be reviewed not less than 6 months prior to the opening of the new location. The pre-operational self-study must be submitted 60 days prior to the scheduled site visit. See Appendix A.

Application and Monitoring
The criteria for evaluation and monitoring will be determined are those as established for Substantive Change—Governance and Substantive Change—Additional Location/Substantive Change—Branch Campus depending on the COCA’s accreditation role and the nature of the agreement between the two institutions.

If two COMs intend to merge and create a new legal entity, then this will be reviewed as a Substantive Change—Governance Legal Status or Form of Control or Ownership of the Institution. Depending on the nature of the new legal entity, the COCA may direct a comprehensive on-site evaluation of all accreditation standards or some portion thereof in addition to those normally reviewed in a Substantive Change—Governance Legal Status or Form of Control or Ownership of the Institution.

If two COMs intend to merge in a manner that one of the COMs remains the surviving entity, and has institutional accreditation from the COCA, then this will be reviewed as a Substantive Change—Branch Campus or Additional Location, depending on how the surviving COM intends to operate the acquired COM.

If two COMs intend to merge in a manner that one of the COMs remains the surviving entity, and has programmatic accreditation from the COCA, then this will be reviewed as a Substantive Change—Additional Location.

In addition to the monitoring activities referenced above, the COCA may require a progress report(s), student survey, and/or a focused site visit.
Addition of a Permanent Location at which a Teach-out is Being Conducted for Students of Another Institution That Has Ceased Operations

Definition
A COM that seeks to add a permanent location at a site at which the institution is conducting a teach-out for students of another COM that has ceased operations before all its students have completed their program of study.

Timing
As per substantive change requested.
Application must be reviewed at a COCA meeting occurring at least 12 months prior to the anticipated acquisition date of the additional permanent location. An expedited review can be requested. Application materials must be submitted 90-60 days prior to the COCA meeting where the substantive change will be discussed.

Application
The request for acquiring a permanent location at which a teach-out is being conducted must include documentation that describes the following:

1. Introduction to the COM making the acquisition, including history and mission;
2. Introduction to the COM requiring the teach-out, including history and mission;
3. Details on all educational programs provided at each institution, including programmatic and institutional accreditations;
4. Details on the teach-out timeline;
5. Details on the financial impact on the CM acquiring the new permanent location;
6. Proposed timeline for acquiring the COM as a new permanent location;
7. The need for acquiring a new location, including if the location is to operate a Branch Campus or Additional Location;
8. How the curriculum provided at the new location will be combined with the curriculum of the acquiring institution;
9. The new facilities at which the curriculum will be provided;
10. The faculty that will provide instruction at the new location;
11. How this change will impact the acquiring COM’s curriculum; and
12. How this change will impact the students, faculty and staff at the acquiring institution.
13. How the curriculum provided by the new location will be assessed.

Further information may be required depending on whether the acquiring COM intends to operate the new permanent location as a Branch Campus or an Additional Location. This may include the completion of self-study/site visit.

Application and Monitoring
The criteria for evaluation and monitoring are those as established for Substantive Change—Governance Change in Legal Status or Form of Control or Ownership of the Institution
and Substantive Change–Additional Location/Substantive Change–Branch Campus depending on
the COCA’s accreditation role and the nature of the agreement.

If the COM that remains the surviving entity has institutional accreditation from the COCA, then
this will be reviewed as a Substantive Change–Branch Campus or Additional Location, depending
on how the surviving COM intends to operate the acquired COM.

If the COM that remains the surviving entity has programmatic accreditation from the COCA, then
this will be reviewed as a Substantive Change–Additional Location.

In addition to the monitoring activities referenced above, the COCA may require a progress
report(s), student survey, and/or a focused site visit.
Planned Increase in Class Size

This policy will be posted for public comment at a later date.
1 \textbf{Unplanned Increase in Class Size}

2

3 This policy will be posted for public comment at a later date.
Appendix A: Pre-Operational Site Visit

The COCA requires a Pre-Operational Site Self-Study and Site Visit prior to the opening of any new COM facility (e.g., additional location, branch campus, an existing COM changing location, acquisition of a COM by another, etc.) to determine readiness of the facility for students, administration, and faculty to begin instruction.

The Pre-Operational Site Visit Report must be completed not less than six months prior the start of the academic year at the new facility. A Pre-Operational Self-Study must be completed at least 60 days prior to the scheduled site visit and will include elements determined by the COCA to assess the new facility’s readiness. This may include, without limitation, the following Continuing Accreditation elements (or corresponding Pre-Accreditation elements for the opening of a Branch Campus):

i. Element 1.4: Governance & Program Policies
ii. Element 1.5a/1.5b: Non-Discrimination
iii. Element 1.7: Clinical Affiliation Agreements
iv. Element 2.3: Academic and Administrative Leadership
v. Element 3.1: Financial Resources
vi. Element 3.4: Financial Audit
vii. Element 4.1: Facilities
viii. Element 4.2: Security and Public Safety
ix. Element 4.3: Information Technology
x. Element 4.4: Learning Resources
xi. Element 6.1: Curriculum Design and Management
xii. Element 6.4: Osteopathic Core Competencies
xiii. Element 6.5: Scientific Method
xiv. Element 6.6: Principles of Osteopathic Medicine
xv. Element 6.7: Self-Directed Learning
xvi. Element 6.8: Inter-professional Education for Collaborative Practice
xvii. Element 6.9: Clinical Education
xviii. Element 6.10: Clinical Experience
xix. Element 6.11: Comparability across Clinical Education Sites
xx. Element 7.1: Faculty and Staff Resources and Qualifications
xxi. Element 7.3: Department Chair Qualifications
xxii. Element 7.4: Primary Care Leadership
xxiii. Element 7.5: OMM/OPP Leadership
xxiv. Element 8.1: Research and Scholarly Activity Strategic Plan
xxv. Element 8.2: Research and Scholarly Activity Budget
xxvi. Element 9.1: Admissions Policy
xxvii. Element 9.2 Academic Standards
xxviii. Element 9.4: Secure Record Keeping
xxix. Element 9.5 Academic Counseling
xxx. Element 9.6 Career Counseling
xxx. Element 9.7: Financial Aid Counseling
xxxii. Element 9.8: Mental Health Services
xxxiii. Element 9.9: Physical Health Services

COMs for which the COCA serves as the institutional accreditor must demonstrate compliance with all the elements under Standard 12.

\[\text{For new COMs, readiness to begin teaching will be confirmed through the Pre-Accreditation Site Visit as outlined in the document COM: New & Developing Accreditation Standards.}\]