

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
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Accreditation of Colleges of Osteopathic Medicine: COCA Substantive Change Policies and Procedures

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Table of Contents

1

2 **General Information.....3**

3 **Substantive Changes Requiring Comprehensive Evaluation4**

4 Change in Educational Mission or Objectives of the Institution.....5

5 Change in the Location of the Institution6

6 Change in Legal Status, Form of Control, or Ownership of the Institution.....8

7 Change in Curriculum/ Change in Curriculum Length.....10

8 Change in Hour Calculations.....12

9 Additional Location13

10 Branch Campus14

11 Transition from a Branch Campus to an Independent COM.....15

12 Contracting with a non-Title IV Eligible Institution for 25% to 49% of a Program.....16

13 The criteria for evaluation and monitoring will be determined depending on the nature of the

14 agreement between the two institutions. This may include a progress report(s), student survey,

15 and/or a focused site visit.Acquisition of Any Other Institution or any Program or Location of

16 Another Institution17

17 Addition of a Permanent Location at which a Teach-out is Being Conducted for Students of

18 Another Institution That Has Ceased Operations20

19 Planned Increase in Class Size.....22

20 Unplanned Increase in Class Size23

21 **Appendix A: Pre-Operational Site Visit.....24**

22
23
24
25

1 General Information

2 ~~The COCA will maintain complete and accurate records of all decisions made regarding requests for~~
 3 ~~substantive changes, including the correspondence that is significantly related to those decisions.~~ A
 4 Substantive Change is any modification in a college of osteopathic medicine's (COM) operations,
 5 governance, or legal status that could impact the COM's ability to continue to meet the COCA's
 6 accreditation requirements for the delivery of the osteopathic medical education curriculum.
 7 Substantive changes that must be reported to the COCA are defined by the U.S. Department of
 8 Education under 34 CFR §602.22. The COCA will not grant "pre-approval" of Additional Locations
 9 or Branch Campuses as described in 34 CFR 602. ~~If a COM wishes to implement a Substantive~~
 10 ~~Change, the~~ A COM must receive prior approval from the COCA at least 120 days before the
 11 implementation of the Substantive Change, or within the time frame as described under each change
 12 below. The COCA will approve a Substantive Change when the criteria for the requested change
 13 have been met and the COCA determines that the change will not adversely affect the capacity of
 14 the COM to meet the Continuing Accreditation Standards. The COCA will not review a Substantive
 15 Change for a New and Developing COM until at least one year after graduation of the first class of
 16 students.

17
 18 Substantive Changes that require the COCA will review approval are include:

- 19
- 20 1. Any change in the established mission or objectives ~~or location~~ of the institution;
- 21 ~~4.2. Change in the location of the institution;~~
- 22 ~~2.3.~~ Any change in the legal status or form of control of the institution;
- 23 ~~3.4. Addition~~ Change of instruction or an increase or decrease in the length of curriculum which
- 24 represents a significant departure from the current curriculum;
- 25 ~~4.5.~~ A change from clock hours to credit hours or vice versa;
- 26 ~~5.6.~~ A substantial increase or decrease in the number of clock or credit hours awarded for
- 27 completion of the curriculum;
- 28 ~~6. A substantial increase or decrease in the length of the curriculum;~~
- 29 7. Establishment of an Additional Location or Branch Campus geographically apart from the
- 30 main campus;
- 31 8. Contracting with a non-Title IV eligible institution for between 25% and 49% of a program;
- 32 9. Acquisition of any other institution or any program or location of another institution;
- 33 10. Addition of a permanent location at which a teach-out is being conducted for students of
- 34 another institution that has ceased operations;
- 35 ~~10.~~ 11. Transition from a Branch Campus to an independent COM; and
- 36 12. Any anticipated or unplanned increase in class size.
- 37

38 The COCA may consider simultaneous substantive change requests submitted at the same time but
 39 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
- ~~4.4.~~ 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 ~~the a~~ requests for Substantive Change be evaluated with a comprehensive evaluation, in addition to the evaluation requirements that exist for ~~that 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~~ three (3) 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 and~~ 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 For~~

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

1 **Change in Educational Mission or Objectives of the Institution**

2
3 Definition

4 A substantive change in educational mission or objectives will be considered when the change
5 results in a need to alter the admissions policies, organizational chart, facilities, or financial plan~~sing~~
6 as a result of the new mission or objectives.

7
8 Timing

9 Application must be reviewed by the COCA at a meeting held at least 120 days prior to when the
10 anticipated change would become effective. [Application materials for a request in educational](#)
11 [mission or objectives must be submitted](#) ~~Application should occur~~ at least ~~90~~60 days prior to the
12 COCA meeting where the Substantive Change request will be addressed

13
14 Application

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

- 17
- 18 1. The rationale for the change;
- 19 2. If the COM is part of a larger institution, ~~document~~ [a description of](#) how the change
20 impacts the mission of the parent organization;
- 21 3. The process to make the change in mission/organizational objectives;
- 22 4. The effect this change will have on learning outcome assessments, facilities, faculty,
23 admission policies and procedures, and the curriculum;
- 24 5. Governing body review and approval; ~~and~~
- 25 ~~6. Announcement~~ [Implementation plan to the announce the](#) ~~of~~ the proposed change to
26 students, faculty, staff, alumni, and the public; ~~and~~
- 27 ~~6.7.~~ [Anticipated date of when the change in mission or objectives will be implemented.](#)
- 28

29 [Depending on the nature of the requested change to educational mission or objectives of the](#)
30 [institution, a self-study may be required documenting compliance with the following Continuing](#)
31 [Accreditation elements:](#)

- 32
- 33 1. [Element 1.1: Program Mission](#)
- 34 2. [Element 1.2: Strategic Plan](#)
- 35 3. [Element 3.1: Financial Resources](#)
- 36 4. [Element 4.1: Facilities](#)
- 37 5. [Element 7.1: Faculty and Staff Resources and Qualifications](#)
- 38 6. [Element 6.1: Curriculum Design and Management](#)
- 39 7. [Element 9.1: Admissions Policies](#)
- 40 8. [Element 11.1: Program Assessment](#)
- 41

42 Monitoring

43 Monitoring will occur as part of the routine annual reporting to the COCA. [In addition, the COCA](#)
44 [may require a progress report, student survey, or a focused site visit.](#)

1 **Change in the Location of the Institution**

2
3 Definition

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

7
8 Timing

9 A request for a change in the location of the institution must be ~~submitted to the~~ reviewed at a
10 COCA meeting in the calendar year prior ~~at least 18 months prior~~ to the anticipated move.
11 Application materials must be submitted at least ~~120-60~~ days prior to the COCA meeting where the
12 Substantive Change request will be addressed.

13
14 Application

15 A request for a change in an institution's location must provide documentation that describes the
16 following:

- 17 1. Appropriate charters, licenses, or approvals required to function if location is moved to a
18 new jurisdiction;
- 19 2. The new facilities including a building and/or remodeling plans, project budget, and
20 completion timelines;
- 21 3. Budget for move and other related expenses;
- 22 4. Impact on the recruitment plan;
- 23 5. Impact on the currently enrolled students;
- 24 6. Impact on the existing faculty;
- 25 7. Impact on the clinical education program; and
- 26 8. Governing body discussion and approval of the proposed change.
- 27 9. Submit a certificate of occupancy for the new location at least 6 months prior to
28 beginning instruction at the new facility
- 29 9. Facility and faculty contingency plan if the new facilities are not ready by TBD

30
31 ~~The Change of Location of an Institution self-study may include the following elements:~~

32 Depending on the nature of the requested change, a self-study may be required demonstrating
33 compliance with the following Continuing Accreditation elements:

- 34
35 1. Element 1.2: Strategic Planning
- 36 2. Element 1.3: Licensing and Regional/Institutional Accreditation
- 37 3. Element 3.1: Financial Resources
- 38 4. Element 3.2: Financial Planning and Budgeting
- 39 5. Element 3.4: Financial Audit
- 40 6. Element 4.1: Facilities
- 41 7. Element 4.2: Security and Public Safety
- 42 8. Element 4.3: Information Technology
- 43 9. Element 4.4: Learning Resources
- 44 10. Element 6.9: Clinical Education

1 [11. Element 6.10: Clinical Experience](#)

2 [12. Element 6.11: Comparability Across Clinical Education Sites](#)

3 [13. Element 7.1: Faculty and Staff Resources and Qualifications](#)

4 [14. Element 9.8: Mental Health Services](#)

5 [15. Element 9.9: Physical Health Services](#)

6
7
8 Site Visit

9 A [pre-operational focused](#) site visit to the new location will ~~occur prior~~ be conducted not less than
10 [six \(6\) months prior to the opening of the new location](#) ~~the review of the substantive change request~~
11 ~~by the COCA.~~ [See Appendix A.](#)

12
13 Monitoring

14 Monitoring will occur as part of the routine annual reporting to the COCA. [In addition, the COCA](#)
15 [may require a progress report, student survey, or a focused site visit.](#)

1 **Change in Legal Status, ~~or~~ Form of Control, or Ownership of the Institution**

2
3 Definition

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

7
8 Timing

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

13
14 Application

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

- 17
- 18 1. Governing body decisions and approval of the proposed change;
- 19 2. New or amended Articles of Incorporation;
- 20 3. New or revised governing body bylaws;
- 21 4. New or revised organizational chart;
- 22 5. Announcement of the proposed changes to students, faculty, staff, alumni,
- 23 the public;
- 24 6. Operating pro forma budget (~~pro forma~~) for the next 5 years and 3 years
- 25 audited financial statements for the new ownership
- 26

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

- 29
- 30 1. Element 1.2: Strategic Plan
- 31 2. Element 1.3: Licensing and Regional/ Institutional Accreditation
- 32 3. Element 1.4: Governance & Program Policies
- 33 4. Element 1.5a or 1.5b: Non-Discrimination
- 34 ~~5. Element 1.5b: Non-Discrimination for Faith Based Institutions~~
- 35 5. Element 1.6: Degree Granting Body
- 36 6. Element 1.7: Clinical Education Affiliation Agreements
- 37 7. Element 3.1: Financial Resources
- 38 8. Element 3.2: Financial Planning and Budgeting
- 39 ~~8,9.~~ Element 7.1: Faculty and Staff Resources
- 40 10. Element 7.7: Faculty Association
- 41 ~~9,11.~~ Element 7.8: Faculty Appointment and Advancement
- 42
- 43
- 44

1 Monitoring

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

4 Additional monitoring will occur as part of the routine annual reporting to the COCA. [In addition,](#)
5 [the COCA may require a progress report or student survey.](#)
6

1 Change in Curriculum/ Change in Curriculum Length

3 Definition

4 A substantive change in curriculum/[curriculum length](#) will be considered when a comprehensive
5 change in the curriculum is [planned](#)~~occurring~~, which means a significant departure from the existing
6 curriculum content, [length](#), or method of delivery. ~~A substantive change is NOT merely a~~
7 modification made [to the curriculum](#) as part of the routine curricular [evaluation and assessment](#)/
8 improvement process [is not considered a substantive change](#).

10 Timing

11 ~~Application~~ [A request for a change in curriculum should](#)~~must~~ [be reviewed at the April COCA](#)
12 [meeting occur](#) in the calendar year prior to ~~the~~ [when the](#) desired change [will occur](#). [Application](#)
13 [materials must be submitted and](#) at least ~~90~~ [60](#) days prior to the COCA meeting where the
14 substantive change will be addressed.

16 Application

17 A request for a change in curriculum/[curriculum](#) must provide documentation that describes [the](#)
18 [following](#):

- 20 1. The [proposed](#) curriculum change;
- 21 2. Analysis of additional ~~resources~~—financial, facility, and faculty [resources](#) needed
22 for the curriculum change;
- 23 3. Curriculum Committee discussion and approval; and
- 24 4. Faculty governance discussion and approval.
- 25 5. Changes needed in recruitment, academic counseling, and career counseling

27 [Depending on the scope of the change requested, the Change in Curriculum/Curriculum Length](#)
28 [application may include self-study demonstrating compliance with the following Continuing](#)
29 [Accreditation elements](#):

- 31 1. [Element 3.1: Financial Resources](#)
- 32 2. [Element 3.2: Financial Planning and Budgeting](#)
- 33 3. [Element 3.4: Financial Audit](#)
- 34 4. [Element 4.1: Facilities](#)
- 35 5. [Element 4.3: Information Technology](#)
- 36 6. [Element 4.4: Learning Resources](#)
- 37 7. [Element 6.1: Curriculum Design and Management](#)
- 38 8. [Element 6.2: Programmatic Level Educational Objectives](#)
- 39 9. [Element 6.3: Maximum Length of Completion](#)
- 40 10. [Element 6.4: Osteopathic Core Competencies](#)
- 41 11. [Element 6.5: Scientific Method](#)
- 42 12. [Element 6.6 Principles of Osteopathic Medicine](#)
- 43 13. [Element 6.7: Self-Directed Learning](#)
- 44 14. [Element 6.8: Interprofessional Education for Collaborative Practice](#)

- 1 [15. Element 6.9: Clinical Education](#)
- 2 [16. Element 6.10: Clinical Experience](#)
- 3 [17. Element 6.11: Comparability Across Clinical Education Sites](#)
- 4 [18. Element 7.1: Faculty and Staff Resources and Qualifications](#)
- 5 [19. Element 7.3: Department Chair Qualifications](#)
- 6 [20. Element 7.4: Primary Care Leadership](#)
- 7 [21. Element 7.5: OMM/OPP Leadership](#)
- 8 [22. Element 7.8: Faculty Appointment and Advancement](#)
- 9 [23. Element 7.7: Faculty Association](#)
- 10 [24. Element 8.1: Research and Scholarly Activity Strategic Plan](#)
- 11 [25. Element 9.2: Academic Standards](#)
- 12 [26. Element 9.5: Academic Counseling](#)
- 13 [27. Element 11.1: Program Assessment](#)
- 14 [28. Element 11.2: Student Evaluation of Instruction](#)

15
16 Monitoring

17 All monitoring will occur as part of the routine annual reporting to the COCA. [In addition, the](#)
18 [COCA may require a progress report, student survey, or a focused site visit.](#)

1 **Change in Hour Calculations**

2
3 Definition

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

6
7 Timing

8 A request for change in hour calculation ~~Application should~~ must be reviewed at the April COCA
9 meeting in the calendar year ~~occur at least~~ prior to when the desired change will occur. Application
10 materials must be submitted ~~90~~ 60 days prior to the COCA meeting ~~where~~ when the substantive
11 change request will be addressed.

12
13 Application

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

- 18
- 19 1. Rational as to why the COM is making the change;
- 20 2. Anticipated impact to students and faculty;
- 21 3. Anticipated impact to the COM curriculum, if any;
- 22 4. Impact on the classification part-time vs full-time students;
- 23 5. Impact on the anticipated graduation date of existing students; and
- 24 6. Approval from the COM's regional or institutional accreditor, if not
25 institutionally accredited by the COCA.
- 26 7. Curriculum Committee discussion and approval; and
- 27 8. Faculty governance discussion and approval.
- 28

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

- 31
- 32 1. Element 1.3: Licensing and Regional/Institutional Accreditation
- 33 2. Element 6.1: Curriculum Design and Management
- 34 3. Element 9.2: Academic Standards
- 35 4. Element 11.1: Program Assessment
- 36

37 Monitoring

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

1 **Additional Location**

2

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

1 **Branch Campus**

2

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

- 1 **Transition from a Branch Campus to an Independent COM**
- 2
- 3 This policy will be posted for public comment at a later date.

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

2
3 Definition

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

7
8 If the instruction will occur at the COM or this change request impacts 25% - 49% of the program
9 offering, then this will be reviewed as a Substantive Change– Curriculum.

10
11 The COCA does not approve contracts with non-Title IV eligible institutions ~~for~~ to provide 50% or
12 more of a COM's educational program.

13
14 Timing: ~~As per substantive change requested.~~

15
16 Application must be reviewed at a COCA meeting at least 18 months prior to the anticipated start
17 date of the contract. Application materials must be submitted at least 60 days prior to the COCA
18 meeting where the substantive change will be addressed.

19
20 ~~Application and Monitoring:~~

21 ~~The criteria for evaluation are those as established for Substantive Change–Curriculum and~~
22 ~~Substantive Change–Additional Location, depending on the nature of the agreement.~~

23
24 ~~If the instruction will occur at the COM or this change request impacts 25-49% of the program~~
25 ~~offering, then this will be reviewed as a Substantive Change–Curriculum.~~

26
27 ~~The COCA does not approve contracts with non-Title IV eligible institutions for 50% or more of a~~
28 ~~COM's educational program.~~

29
30 Application

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

- 33
34 1. Introduction to the COM, including history and mission
35 2. Introduction to the non-Title IV eligible institution for the proposed contract
36 3. Need for contracting with a non-Title IV eligible institution
37 4. The curriculum to be provided by the contracted institution
38 5. The facilities at which the contracted curriculum will be provided
39 6. The faculty that will providing instruction at the contracted institution (current licensing
40 and certification document must be provided for any physician faculty)
41 7. How this change will impact the COM's curriculum
42 8. How this change will impact students, faculty and staff
43 9. How the curriculum provided by the contracted institution will be assessed
44

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

4

5 Monitoring

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

1 **Acquisition of Any Other Institution or any Program or Location of Another Institution**

2
3 Definition

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

7
8 ~~Timing: As per substantive change requested.~~

9 Application must be reviewed at a COCA meeting occurring at least 24 months prior to the desired
10 date of offering instruction at the acquired programs. Application materials must be submitted at
11 least ~~90~~ 60 days prior to the COCA meeting where the substantive change will be discussed.

12
13 ~~Application and Monitoring:~~

14
15 Application

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

- 18
19 1. An introduction to the COM requesting to make the acquisition, including history and
20 mission;
- 21 2. An introduction to the program/institution being acquired, including history and
22 mission;
- 23 3. Details on all educational programs provided at each institution, including programmatic
24 and institutional accreditations;
- 25 4. The need for acquiring a new institution/program;
- 26 5. The curriculum to be provided by the new combined program/institution;
- 27 6. The facilities at which the combined program curriculum will be provided;
- 28 7. The faculty that will providing instruction at the combined institution;
- 29 8. How this change will impact the acquiring COM's curriculum;
- 30 9. How this change will impact students, faculty and staff at both programs/institutions;
31 and
- 32 10. How the curriculum provided by the new combined program/institution will be assessed
33

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

37
38 A pre-operational focused site visit report will be reviewed not less than 6 months prior to the
39 opening of the new location. The pre-operational self-study must be submitted 60 days prior to the
40 scheduled site visit. See Appendix A.

41
42
43 ~~Application and Monitoring~~

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

5
6 If two COMs intend to merge and create a new legal entity, then this will be reviewed as a
7 Substantive Change–~~Governance~~ Legal Status or Form of Control or Ownership of the Institution.
8 Depending on the nature of the new legal entity, the COCA may direct a comprehensive on-site
9 evaluation of all accreditation standards or some portion thereof in addition to those normally
10 reviewed in a Substantive Change–~~Governance~~ Legal Status or Form of Control or Ownership of
11 the Institution.

12
13 If two COMs intend to merge in a manner that one of the COMs remains the surviving entity, and
14 has institutional accreditation from the COCA, then this will be reviewed as a Substantive Change–
15 Branch Campus or Additional Location, depending on how the surviving COM intends to operate
16 the acquired COM.

17
18 If two COMs intend to merge in a manner that one of the COMs remains the surviving entity, and
19 has programmatic accreditation from the COCA, then this will be reviewed as a Substantive
20 Change–Additional Location.

21
22 In addition to the monitoring activities referenced above, the COCA may require a progress
23 report(s), student survey, and/or a focused site visit.

1 **Addition of a Permanent Location at which a Teach-out is Being Conducted for Students of**
2 **Another Institution That Has Ceased Operations**

3
4 Definition

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

8
9 Timing

10 ~~As per substantive change requested.~~

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

15
16 Application

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

- 19
- 20 1. Introduction to the COM making the acquisition, including history and mission;
- 21 2. Introduction to the COM requiring the teach-out, including history and mission;
- 22 3. Details on all educational programs provided at each institution, including programmatic
23 and institutional accreditations;
- 24 4. Details on the teach-out timeline;
- 25 5. Details on the financial impact on the CM acquiring the new permanent location;
- 26 6. Proposed timeline for acquiring the COM as a new permanent location;
- 27 7. The need for acquiring a new location, including if the location is to operate a Branch
28 Campus or Additional Location;
- 29 8. How the curriculum provided at the new location will be combined with the curriculum
30 of the acquiring institution.
- 31 9. The new facilities at which the curriculum will be provided;
- 32 10. The faculty that will provide instruction at the new location;
- 33 11. How this change will impact the acquiring COM's curriculum; and
- 34 12. How this change will impact the students, faculty and staff at the acquiring institution.
- 35 13. How the curriculum provided by the new location will be assessed.
- 36

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

40
41
42 ~~Application and Monitoring~~

43 The criteria for evaluation and monitoring are those as established for Substantive Change—

44 ~~Governance~~ Change in Legal Status or Form of Control or Ownership of the Institution

1 and Substantive Change–Additional Location/Substantive Change–Branch Campus depending on
2 the COCA’s accreditation role and the nature of the agreement.

3

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

7

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

10

11 [In addition to the monitoring activities referenced above, the COCA may require a progress](#)
12 [report\(s\), student survey, and/or a focused site visit.](#)

1 **Planned Increase in Class Size**

2

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

4

1 **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

1 [xxxi. Element 9.7: Financial Aid Counseling](#)

2 [xxxii. Element 9.8: Mental Health Services](#)

3 [xxxiii. Element 9.9: Physical Health Services](#)

4 [COMs for which the COCA serves as the institutional accreditor *must* demonstrate](#)
5 [compliance with all the elements under Standard 12.](#)

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[ⁱ 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*.](#)