

**Commission on Osteopathic College Accreditation**

**Accreditation of Colleges of Osteopathic Medicine:  
COCA Policies and Procedures**

*Revised April 2020*



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AMERICAN OSTEOPATHIC ASSOCIATION

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## **Introduction**

These Policies and Procedures govern the implementation of the Commission on Osteopathic College Accreditation (COCA) processes, and articulate the procedures used in the process of accrediting DO-granting medical education programs. These Policies and Procedures are issued to provide information to the public and to promote transparency and consistency of decisions in COCA accreditation actions.

## **General Information**

### *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 our website ([www.aoacoca.org](http://www.aoacoca.org)). Programs judged by the COCA to meet national standards of quality are designated as “accredited” for a usual term of up to ten years.

### *Scope of Recognition (Institutional and Programmatic Accreditation)*

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 Secretary of the USDE has recognized the COCA as an accrediting agency. Under 34 C.F.R. §602.3, this grant of recognition is a determination by the USDE that the COCA is “a reliable authority regarding the quality of education or training offered by institutions or programs it accredits[.]” The

COCA's scope of recognition, as granted by the USDE, is "the accreditation and pre-accreditation throughout the United States of freestanding institutions of osteopathic medicine and of 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 Membership**

See COCA Handbook

### **Committees of the COCA**

See COCA Handbook

### **COCA Appeals Panel**

See COCA Handbook

### **COCA Operating Procedures**

#### *Training of COCA Members*

New members of the COCA are supplied with all relevant standards documents, policy and procedure documents, handbooks, and manuals prior to assuming their duties. New members of the COCA shall undergo training before commencing a term of service. Such training shall focus on outcomes and competencies that COCA members should have and shall include training on the COCA's standards, policies, and procedures and U.S. Department of Education requirements for recognized accreditors.

Formal orientation sessions for new members are held prior to the first meeting they will attend as voting members.

In addition, all COCA members are expected to attend orientation sessions and webinars conducted by the COCA staff for site visit team members and colleges of osteopathic medicine.

#### *Meetings*

The COCA meets in regular session three times a year, in the months of August, December, and April, unless the members agree to a different schedule. The COCA will meet via teleconference as necessary. All meetings, together with their topical agendas, are announced on the COCA website currently at <http://www.aoacoca.org>.

The COCA will conduct its meetings in a hearing room format; voting members of the COCA and the non-voting secretary, and COCA staff as needed, will be seated separately from the gallery seating. Gallery seating is open to public attendees. A testimony table will be designated and placed closer to the COCA seating than that of the gallery seating. The COCA will receive oral reports and comments from all individuals who are not voting commission members from the testimony table. The review of COMs

and accreditation actions will occur in closed session.

Members of the COCA may participate in regular or special meetings by or through the use of any means of communication allowing all participants to simultaneously communicate with each other, such as teleconference or video conference. If a meeting is conducted by such means, the chair shall inform all participating COCA members that an official COCA meeting is taking place at which official business may be transacted. Any COCA member participating in a meeting by such means shall be deemed present in person at such meeting.

Formal action may be taken without an in-person meeting by mail, facsimile, electronic mail ballot, or other asynchronous communications medium, provided that such actions will require the affirmative vote of all COCA members.

### Observers

By precedence, all meetings of the COCA are open to the public. Observers include, but are not limited to, representatives of state and federal accrediting regulatory bodies. The presence of observers will be acknowledged by the chair and recorded in the COCA minutes.

### Special Meetings

The chair and vice chair, in consultation with the COCA staff, may call a special in-person meeting or conference call to deal with any issue(s) that they determine cannot wait until the next scheduled regular meeting.

### Executive Session

Although the COCA conducts its meetings in an open format, there are a few, defined instances in which the COCA will conduct its business in executive session. For example, the COCA will employ executive session for testimony that it deems to be confidential, such as deliberations on accreditation decisions, review of progress reports, substantive changes, and other accreditation actions.

Because the COCA functions in the interest of all stakeholders, including internal and external publics, decisions pertaining to a COM's accreditation status and decisions pertaining to approval of a substantive change request will ordinarily be made by the full COCA at a regularly scheduled meeting. The COCA reserves the right to make such decisions in a special meeting by teleconference when deemed appropriate by the COCA-EC.

### Parliamentary Procedure and Quorum

All meetings of the COCA are conducted in accordance with the current edition of *Robert's Rules of Order*. A quorum shall consist of a simple majority of the voting members of the COCA.

### *COCA Actions*

The COCA will act to approve or deny accreditation within policies and procedures adopted in this manual. The COCA may defer, to a specific time, a decision and request additional information before making an accreditation decision. If such action is taken, this in no way jeopardizes or prejudices the



college's current accreditation standing.

The COCA and/or its COCA Executive Committee (COCA-EC) will have authority to direct a COM or other entity under its jurisdiction to respond to an issue with a “show cause” letter. The show cause letter would be issued in circumstances where the COCA, or any COCA member, learns that a COM may be out of compliance with an accreditation standard, element, procedure, or requirement issued by the COCA. The show cause letter will advise the COM or other entity of the possible non-compliance and allow the COM or other entity an opportunity to appear at the next COCA meeting in order to present the COCA with factual and/or legal reasons why it should not be found to be out of compliance with an accreditation standard, procedure or requirement issued by the COCA. The show cause letter, if issued at the instruction of the COCA-EC, will be circulated to the entire COCA membership before or at the same time it is issued to the COM or other entity.

The COCA will be responsible for the expenses of individuals invited to attend meetings at the specific request of the chair. The COCA will not be responsible for the expenses of individuals attending the COCA for the following purposes: (a) to offer testimony on behalf of a COM; (b) to offer commentary regarding revisions to a document of the COCA; or (c) to offer “third party” commentary on a proposed action before the COCA.

#### *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.

Premature and/or unauthorized disclosure of information reflecting visiting team or COCA views concerning the accreditation status of a COM is not permitted.

Except for the information that is presented in open sessions of the COCA, members of the COCA and visiting 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 USDE, it is the obligation of the COCA to maintain the confidentiality of its relationships with its 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.

#### *Confidentiality and Conflict of Interest Policy*

This section shall serve as a comprehensive statement on the confidentiality and conflict of interest policies for the American Osteopathic Association’s Commission on Osteopathic Accreditation (COCA) and its constituent committees and subcommittees, which will hereafter be included in all references to “COCA”. The policy statement governs treatment of confidential information and actual, apparent and alleged conflicts of interest and appearances of impropriety that may arise during the deliberations and actions of the COCA. The policy is intended to facilitate the disclosure and resolution of conflicts of interest. These policies are applicable to members of the COCA, COCA staff, members of the Evaluators Registry participating as site visit team members, the Appeal Panel, and consultants (hereinto referred to

as “COCA Members”).

The proper care and handling of confidential information and documents provided through the course of executing one’s COCA responsibilities must be acknowledged and adhered to. Any information provided as part of one’s role with the COCA shall not be shared, forwarded, copied distributed or discussed with individuals outside of its intended audience and the purpose for which it was provided. Nor should an individual utilize confidential information for their personal advantage or the advantage of any other entity.

With respect to conflicts of interest, the policy of the COCA shall be to err on the side of precaution in order to safeguard the integrity of the COCA. COCA members should be sensitive not only to the existence of a conflict of interest, but also to the possible appearance of improper conduct or conflict of interest where no conflict of interest may exist. The following conflict of interest policy is consistent with each COCA member’s responsibilities under the duty of loyalty<sup>1</sup> and duty of obedience.<sup>2</sup>

A conflict of interest arises Ultimately there is no agreed upon taxonomy of conflict of interest. In simplest terms, a conflict of interest arises where an individual COCA member may be influenced in her or his decision-making process due to a relationship with an 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. An employment, student, or consulting (current or within the last 5 years) relationship with an entity under consideration
4. Employment, student, or other relationship with a competitor of a program under consideration

The primary responsibility for disclosure of a potential conflict of interest rests with the individual COCA member. COCA members must report a potential conflict of interest to the COCA chair or a COCA staff member prior to any meeting or assignment to participate in a COCA site review. The determination if a conflict of interest exists and any required resolution (e.g., recusal from a discussion or survey activity) will be determined by the COCA Chair or the COCA Secretary.

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<sup>1</sup> The duty of loyalty requires that an individual acting in the name of a corporate body will act with that organization’s best interests in mind. For example, a COCA member may also be an officer or member of another organization or entity. In satisfying the duty of loyalty, those individuals would be expected to take actions based upon the best interest of the AOA’s COCA rather than what might be the best interest of the particular organization of which he or she is also a member.

<sup>2</sup> The duty of obedience requires that an individual acting in the name of a corporate body will adhere to the standards, policies and procedures of that organization. Although individuals are expected to use good judgment when making decisions on behalf of a corporate body, they are expected to apply that judgment with respect to existing standards, policies and procedures of the corporate body. In making decisions that demonstrate duty of obedience, an individual will know, understand, consider, and follow the standards, policies and procedures appropriate to the matter to be decided.

### *Consultations*

No COCA commissioner or member of the Evaluator Registry may 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 may 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.

### *Development and Review of Accreditation Standards*

The COCA, in establishing procedures for the review of the accreditation documents, recognizes the need for an ongoing review process. Therefore, the COCA's accreditation standards, including the policies and procedures for substantive change, will be reviewed for relevancy on a continuous basis. Suggestions for new standards or modifications to existing standards may be brought to the COCA from any source.

A major review of the Accreditation Standards will be undertaken approximately every five years. The COCA will announce the review process via the COCA website, <http://www.aococa.org>. This announcement will include information about the review process and its timeline.

A survey of the standards will be conducted prior to the initiation of the accreditation document review process. The survey document will query respondents to evaluate the accreditation document as it relates to the a) quality of osteopathic medical education, and b) the relevancy of the educational training needs of the osteopathic medical student. The COCA will solicit comments from a representative group of constituents.

Changes to the documents *Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards* and *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards* will be made only after providing notice and opportunity for comment by affected persons, institutions, and organizations. Substantive changes to existing standards and elements (which impose new or additional requirements on programs) will undergo review by the public before being adopted. If the COCA determines that reviews indicate a need to revise one or more standards and/or elements, the COCA will act within 12 months to initiate the needed change(s).

Final decision on the content of any accreditation standard or element is at the sole determination of the COCA.

Any new or revised standard or element adopted by the COCA will be published on the website and in the documents *Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards* and *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*, along with the academic year in which the standard will become effective.

### *Fraud or Abuse*

An institution shall not engage in fraud or abuse, as proscribed under state and federal laws and regulations, or in practices or procedures that are designed, or have the tendency, to create a falsification or to deceive students. If the COCA receives an allegation of fraud or abuse concerning an institution from the federal government, any state entity or other party, the COCA will determine whether the

alleged fraud or abuse constitutes a violation of any of the criteria for accreditation, particularly related to institutional integrity. The COCA will review such allegations through its complaint process or through other mechanisms provided for in the policies and procedures. An institution that has been determined to have engaged in fraud or abuse shall be considered to be in violation of COCA standards and shall be subject to sanctions or withdrawal of accreditation. The COCA will report suspected incidents of fraud or abuse to the USDE, regional accrediting organizations, and state licensing agencies as required .

#### *Interpretation of Standards*

The evidence noted from a site visit report will be considered the gold standard of evidence of compliance with a standard of accreditation. Final interpretation of compliance with elements or standards rests in the sound discretion of the COCA. The COCA, typically, does not issue advisory or hypothetical opinions on the interpretation of standards.

#### *Publishing of Accreditation Actions*

The COM retains the right to publicize accreditation reports for the institution. If a COM releases part or all of an accreditation report in such a manner as to misrepresent or distort the report of the COCA, the COCA may release either appropriate parts of a report or the full report to correct the misinformation. The COCA will inform the COM in advance of the release and the substance of the release of any such information.

If the COM elects to publicly disclose its Candidate, Pre-Accreditation, or Accreditation status received from the COCA, it must state the following:

The college has received Candidate, Pre-Accreditation, or Accreditation status from the American Osteopathic Association's Commission on Osteopathic College Accreditation, which is the recognized accrediting agency for the approval of colleges and programs leading to the Doctor of Osteopathic Medicine (DO) degree. The address and phone number of the accrediting agency are: Department of Accreditation, American Osteopathic Association, 142 East Ontario Street, Chicago, IL 60611. Telephone (312) 202-8124; Fax (312) 202-8424; email [predoc@osteopathic.org](mailto:predoc@osteopathic.org).

#### *Record Retention Policy*

The United States Department of Education requires that all accrediting agencies recognized by the U.S. Secretary of Education meet requirements as specified at 34 CFR part 602. Among the requirements is to maintain records under 34 CFR §602.15(b):

The agency must have the administrative and fiscal capability to carry out its accreditation activities in light of its requested scope of recognition. The agency meets this requirement if the agency demonstrates that—

(b) The agency maintains complete and accurate records of—

- (1) Its last full accreditation or pre-accreditation review of each institution or program, including on-site evaluation team reports, the institution's or program's

responses to on-site reports, periodic review reports, any reports of special reviews conducted by the agency between regular reviews, and a copy of the institution's or program's most recent self-study; and

- (2) All decisions made throughout an institution's or program's affiliation with the agency regarding the accreditation and pre-accreditation of any institution or program and substantive changes, including all correspondence that is significantly related to those decisions.

### Accreditation Documents

Accreditation documents, including but not limited to: accreditation reports (site visits, progress reports, mid-cycle reports, and appeals), self-studies, substantive change, and other related correspondence will be maintained in the COCA office for the greater of five years or two accreditation cycles.

Other Accreditation documents that must be kept are:

1. *AOA Commission on Osteopathic College Accreditation Handbook*;
2. *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards, Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards*, including all tables and appendices;
3. *Accreditation of Colleges of Osteopathic Medicine: COM Substantive Change Policies and Procedures*
4. *COCA Policies and Procedures*; and
5. USDE files.

When archiving any documents, only the final approved document will be archived. All other supporting material will be discarded (i.e., draft copies, individual responses from the public comment period). USDE material to be archived includes all accreditation petitions, interim progress reports, and all official USDE correspondence (to and from the AOA COCA). All other documents will be discarded.

AOA COCA meeting material and related correspondence will be maintained for five years. All other material related to meeting arrangements will be maintained for one year and discarded thereafter.

Other committee materials and related correspondence will be maintained for five years and discarded thereafter.

Miscellaneous correspondence will be maintained for five years and then discarded. Examples of this type of correspondence could be inquiry letters or requests for information.

### *Reporting of COCA Accreditation Actions*

#### To Institutions

Within 30 days of any final COCA action on the reports of full or limited visits, the Accreditation staff will send a Final Action Letter conveying the COCA's action, to the Dean of the COM or equivalent. The Final Action Letter includes the COCA's accreditation action regarding the COM, the COCA's findings regarding the program's compliance with accreditation standards, performance related to accreditation elements, and any required follow-up. The Final Action Letter is held confidential by the COCA, but may be disclosed by the COM at its discretion.

#### To External Groups and the Public

The COCA will notify the Secretary of USDE, the relevant state medical licensing boards, the relevant regional (institutional) accreditation body(ies), and the public of actions affecting accreditation status taken at a COCA meeting within 30 days of the meeting, including the decision to award initial accreditation or to renew a COM's accreditation status.

For actions subject to reconsideration (*e.g.*, probation, *etc.*) or appeal (*e.g.*, denial of accreditation, withdrawal of accreditation, *etc.*), the COCA will notify Secretary of USDE, the relevant state medical licensing boards, and the relevant regional (institutional) accrediting body(ies) of the final action at the same time as when the COM is notified, but no later than 30 days after the decision is made final.

All accreditation decisions will be conveyed to the public by posting of the accreditation action on the COCA website within 24 hours of the notification to the COM.

In decisions to deny or withdraw accreditation, the COCA will provide the Secretary of Education, the relevant state medical licensing board, the relevant regional (institutional) accrediting body, and the public with a summary of the facts of its review no later than 60 days after the decision is made final, along with any comments made by the program or the statement that the program has been offered the opportunity to make comments. The COCA website also will reflect the program has been offered the opportunity to provide comments.

If an accredited program withdraws its accreditation status voluntarily or otherwise allows its accreditation status to lapse, the COCA staff will inform the Department of Education and the relevant regional accrediting body and state licensing agency within 30 days of the date of withdrawal or lapse.

The accreditation information posted on the COCA's web site made available to the general public includes the current accreditation status of an accredited program and the date and type of its next accreditation survey, if it has been set, but does not include site visit team reports, correspondence with or documentation submitted by a program in connection with its accreditation status, nor the basis for COCA's actions regarding a program's accreditation status.

If a school makes a public disclosure of its accreditation status, the COM must disclose the status accurately. Any incorrect or misleading statements made by a COM about accreditation actions or accreditation status must immediately be corrected. Failure to make timely correction or clarification may result in reconsideration of the COM's accreditation status. The public information also must

include contact information for the COCA so that the information can be verified.

#### *Research*

The Department of Accreditation staff may conduct research, or contract with a third party to conduct research with the approval of the COCA, based on confidential information in a de-identified form contained in annual reports, self-study documents, and site visit reports. The source documents used for such research may not be shared or made available to other individuals or organizations. Data obtained from the annual reports may be shared or made available to other individuals or organizations to the extent that confidentiality requirements and data-sharing agreements of the American Osteopathic Association, as the sponsoring organization, permits.

#### *Revision of this Policy and Procedure Manual*

At the discretion of the COCA and by majority vote, the COCA may modify the application of these policies and procedures.

#### *Third-Party Comment*

The COCA provides opportunity for third-party comment related to a COM undergoing review for candidacy status, pre-accreditation, or full accreditation. The COCA will also provide opportunity for third-party comment on requests for substantive change or requests to enter into a teach-out agreement. The COCA includes on its website the academic year in which such review will occur, along with the process by which third-party comment may be submitted. Comments must be focused on potential areas of noncompliance with accreditation standards/elements or other related matters that could impact the school's ability to provide a quality program.

Third party comment must be submitted in writing at least thirty (30) days prior to the COCA meeting at which the COM's accreditation status will be addressed. Employees and students of the COM under consideration may not submit third-party comment. While the comment document must identify the commenter, the COCA will maintain the identity of the individual in a confidential manner. The COM will be notified of the third-party comment so that it can have an opportunity to comment. Notice of an opportunity to submit third party comment will be provided with announcements of the COCA meeting on the COCA website at [www.aococa.org](http://www.aococa.org).

#### *Willful Deception*

The provision of false or misleading information or the failure to provide material information may affect accreditation status. If the COCA determines that a program knowingly has supplied false or misleading information or has failed to supply relevant material information to the COCA or to a site visit team or on any required report, the COCA will reconsider the program's accreditation status and term, and determine any appropriate follow-up action, which may include a change in the COM's accreditation status or term. Similar action may be taken if a COM knowingly takes actions that result in misleading information being provided to the COCA or site visit teams, makes misleading or incorrect public statements or disclosures regarding its accreditation status, or fails to notify interested parties of an adverse accreditation action.

## Accreditation Process

The COCA's review of an applicant or proposed COM seeking accreditation or an accredited COM seeking ongoing accreditation begins with the submission of an application and/or self-study demonstrating compliance with applicable COCA standards. When required, an on-site review is conducted by COCA evaluators who are not COCA commissioners, resulting in a site visit report submitted to the COCA. Two members of the COCA are assigned to review the self-study, site visit report, and any additional documentation submitted for a presentation to the COCA for deliberation. As needed, representatives from the organization being reviewed may be asked to attend the meeting to provide additional information. Following its review, the COCA may grant an accreditation decision or request additional information

### *Self-Study*

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. The COM can then use the self-assessment process and its results as tools for continuous, on-going assessment and improvement.

The COM's self-study must be submitted via the COCA electronic accreditation system at least 60 days prior to the scheduled on-site visit or the COCA meeting at which the self-study will be addressed. Access to the self-study in the electronic accreditation system is granted by the COCA accreditation staff; the staff may be contacted via email to [predoc@osteopathic.org](mailto:predoc@osteopathic.org).

### *Site Visit*

The evaluation process for COMs which are fully accredited or in the process of seeking accreditation includes the completion of a self-study, site evaluation by a team of site reviewers, and a COCA review of the self-study and site visit report. For programs in one of the continuing accreditation statuses, the COCA accreditation staff will contact the institution approximately 12 months prior to the anticipated date of a routine accreditation visit to establish specific dates for the on-site review.

Two to three days on-site are typically required for the completion of a comprehensive site visit.

COCA staff considers a number of criteria in selecting team members, including area of expertise, availability, geographical location, conflict of interest, and level of experience. Team members are multi-faceted individuals who have broad knowledge and experience in higher education, including COM administration, with expertise in one or more of the following areas identified by the United States Department of Education:

- Administration
- Education
- Academics
- Osteopathic Medical Practice

The site visit team will also include an Accreditation staff member to serve as a Team Secretary to



coordinate site visit activities between the COM and the site visit team.

The COM will have an opportunity to review the proposed site visit team and request a change in personnel if a conflict of interest is suspected. The COCA Secretary will make the final determination as to whether a change in site visit personnel will be permitted.

A site visit team may also include a site visit evaluator trainee and/or an observer when appropriate. Observers may, upon formal request and approval by the COCA Secretary accompany, site visit teams. Each observer must not be in violation of the conflict of interest standards as adopted by the COCA. Observers from the USDE, and those who represent Federal or State agencies or organizations which may have a legitimate accreditation responsibility, may also accompany on-site visit teams. Costs incurred by this observer will be paid by the observer's organization.

If the COCA directs a site visit and the COM refuses to permit the visit to occur, the COCA will reduce the COM's status to Accreditation with Probation. If the COM already has a status of Accreditation with Probation, the COCA will withdraw accreditation for reasons of non-compliance with the policies and procedures of accreditation.

#### *Focused Site Visit*

A focused site visit may be required by the COCA on the basis of problems noted in an accreditation report, complaint, progress report, or site visit which have been determined not to have been adequately addressed. A focused site visit may also be required when deemed necessary by the COCA.

A focused site visit will typically require one to two days on-site and will focus on specific standards and elements as determined by the COCA. However, if during the conduct of a focused on-site visit, the team identifies critical information pertinent to other standards and elements, the team may document these observations in the site visit report. These observations may then be addressed by the COCA for further review.

#### *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 (Applicant Status Form) submitted by the Chief Executive Officer of the applicant COM.

#### *Candidate Status*

Candidate status is the second step in seeking accreditation by an applicant COM and is conferred with the privilege of recognition by the COCA, which will be publicly announced. Candidate status may be granted to COMs that are in compliance with all the required standards and elements published in the *Accreditation of Colleges of Osteopathic Medicine: New & Developing Accreditation Standards* demonstrating the planning and resources necessary to be expected to be able to proceed to Pre-Accreditation status within two years.

#### Candidate Status Self-Study and Feasibility Study Evaluation

Upon receipt of a completed Candidate Status Self-Study and Feasibility Study, the documents will be reviewed by the COCA or the COCA Executive Committee (COCA-EC) to determine whether the materials are technically complete. A Self Study and Feasibility Study is technically complete if, in the event a site visit were to be authorized, a site visit team could reasonably expect to find evidence on-site to corroborate the contents of the Feasibility Study and to assess the proposed COM's compliance with the standards and procedures required to achieve Candidate Status. The COCA/COCA-EC will review the Self-Study and Feasibility Study within sixty (60) days of receipt of the materials following the Accreditation staff's review and analysis.

In the review of the materials, the COCA/COCA-EC may determine that one or more elements are not technically complete and may request additional information before authorizing a site visit. The COCA/COCA-EC reserves the right to review this information either by (a) teleconference, or (b) vote by electronic mail.

Upon determination by the COCA/COCA-EC that the documents are acceptable and appear to be compliant, Candidate status will be awarded.

#### Candidate Status Accreditation Decisions

Upon receipt of the application for Candidate Status from COMs with Applicant Status, the COCA will either:

- Approve the request if the requirements for Candidate status are exceeded or met;
- Defer the request if the COCA finds that there are a limited number of requirements for Candidate Status that are not met, and the COCA believes that the applicant may be expected to meet the requirements for Candidate Status at the next meeting of the COCA;
- Deny the request if the COM fails to meet the requirements for Candidate status or fails to make proper application. In an adverse decision, the COCA will specify which requirements were not met.

#### Activities Prohibited During Candidate Status

A COM having a Candidate status may not recruit, accept applications from, or admit, prospective students. A COM having a Candidate status may not do any of the following:

- a. Recruit students in any manner, including by solicitation;
- b. Solicit or collect application fees;
- c. Collect application information, including academic transcripts, Medical College Admissions Test (MCAT) scores, and letters of recommendations;
- d. Initiate the admission review process;

- e. Schedule interviews for any potential applicants;
- f. Offer advice on financial aid; or
- g. Issue letters of admission into the COM.

#### Review of Candidate Status

The COCA will review a COM's Candidate Status annually through written reports submitted by the COM until the COM achieves Pre-Accreditation Status. If the COM has not been able to proceed to Pre-Accreditation Status within 24 months of achieving Candidate Status, the COCA will withdraw the COM's Candidate Status. In the event a COM's Candidate Status is withdrawn, and the COM desires to achieve that status again, the COM must file a new application along with a new Candidate Status Self Study and application fee.

#### *Pre-Accreditation Status*

Pre-Accreditation status may be granted to COMs that have achieved Candidate Status and meet the standards of Pre-Accreditation published in the *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*. A Candidate COM must submit a Pre-Accreditation Self-Study and undergo a Pre-Accreditation Comprehensive Site Visit to demonstrate that it meets the standards for Pre-Accreditation status.

#### Timetable to Achieve Pre-Accreditation

The Pre-Accreditation Self-Study may be submitted as soon as Candidate Status is granted and the Escrowed Teach-out and Operating Reserve Accounts are funded. However, the Pre-Accreditation Self-Study must be submitted at least 18 months prior to the intended opening date of the COM. This schedule will permit the orderly progression for the COM to begin its inaugural class.

#### Pre-Accreditation Site Visit

The Pre-Accreditation site visit will be conducted to ensure the accuracy of the Pre-Accreditation Self-Study. This site visit will occur within 60 to 90 days of the approval by the COCA of the Pre-Accreditation Self-Study.

Following receipt of the site visit team's report, the request for the Pre-Accreditation Status will be considered by the COCA at its next regularly scheduled meeting.

#### Pre-Accreditation Status Accreditation Decisions

Upon the application for Pre-Accreditation Status from COMs with Candidate Status, the COCA will either:

- Approve the request if the accreditation standards are met or exceeded;
- Defer the request until the next meeting if the COCA finds that there are a limited number of

requirements for Pre-Accreditation not met, and the COCA believes that the applicant may be expected to meet the requirements for Pre-Accreditation status at the next meeting of the COCA;

- Deny the request, cite the accreditation standards that have not been met by the COM, and continue Candidate Status if the COM fails to meet the standards for Pre-Accreditation, but has not exceeded the maximum term of the Candidate Status; or
- Deny the request, cite the accreditation standards that have not been met by the COM, and withdraw recognition if the COM fails to meet the accreditation standards and has exceeded the maximum term of the Candidate Status.

#### Activities Allowed During Pre-Accreditation

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.

Pursuant to 34 CFR §602.16(a)(2), a COM may not hold Pre-Accreditation Status for more than five years. Pre-Accreditation Status will be awarded to become effective no earlier than July 1 of the calendar year prior to the matriculation of the first class of students. If the COCA makes a decision to award Pre-Accreditation Status at a meeting that occurs prior to 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."

#### Review of Pre-Accreditation Status

Pre-Accreditation Status will be reviewed annually via submitted written reports until the COM achieves Accreditation. An on-site visit will occur during the first and fourth years of class offerings.

Upon review for renewal of Pre-Accreditation status, the COCA will either:

- Approve the request for a renewal period of one year if the accreditation standards are clearly being exceeded or met; or
- Deny the request and deny Pre-Accreditation status citing the accreditation standards that have not been met by the COM. Such termination will be published within 30 days of final action.

If the COM has not been able to proceed to Accreditation status within five years of the granting of Pre-Accreditation Status, the Pre-Accreditation Status will be withdrawn. The teach-out agreement will then be implemented.

#### Timetable to Achieve Accreditation

COMs holding Pre-Accreditation status will undergo a Comprehensive Site Visit in the first and fourth years of education. Pre-Accreditation status will expire following the COCA's grant of Accreditation

status to the COM or after five years from the date of awarding the COM Pre-Accreditation if the COM has not advanced to Accreditation status.

Upon the initial review for accreditation status, the COCA will either:

- Award Accreditation if the accreditation standards are exceeded or met. The date of accreditation will be established as the first business day following the COCA meeting at which the decision is made; or
- Terminate Pre-Accreditation Status if the accreditation standards are not met. Such termination will be published within 30 days of final action.

### *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 an on-site visit.

The COCA may grant the COM one of the following types of accreditation.

**Accreditation with Exceptional Outcome:** This status indicates that a COM is compliant with all standards and meets all elements. For schools with this status, accreditation will be granted for ten years. Monitoring is conducted through submission of the COCA annual report and the Mid-Cycle report that is due in year five.

**Accreditation:** This status indicates that a COM is compliant with all standards. However, there may be non-core unmet elements that must be addressed through progress reporting. For COMs with this status, accreditation will be granted for seven years. Monitoring is conducted through submission of the COCA annual report and the Mid-Cycle report that is due in year three.

**Accreditation with Heightened Monitoring:** This status indicates that a COM is compliant with all but two or fewer standards and ongoing monitoring will occur via progress reporting and annual reports. For schools with this status, accreditation will be granted for four years. Mid-Cycle reporting is due in year two.

**Accreditation with Warning:** This status indicates that a COM is complaint with all but between three and five standards and ongoing monitoring will occur via progress reporting. For schools with this status, accreditation will be granted for two years. The Mid-Cycle report will be submitted with the annual report.

**Accreditation with Probation:** This status indicates a COM is not compliant with more than five standards. For COMs with this status, the accreditation will be granted for no more than one year. Monitoring will occur continuously as deemed necessary by the COCA, including progress reporting, an annual report, and focused site visits.

**Withdrawal of Accreditation:** This status indicates that the quality of a COM's educational

program is compromised and the school was unable to come into compliance with all standards within the allotted timeframe.

While a COM's failure to comply with the Standards is the typical reason for any reduction of status of accreditation, the COCA may order a COM to show cause why its accreditation status should not be reduced or withdrawn following a COM failure to comply with any Standard or Element, Policies and Procedures, or directive of the COCA.

The COCA will specify the standard(s) and element(s) that are not met at the time of its review. All COMs, regardless of accreditation status, must bring all Standards and Elements into compliance within 24 months of the initial award of the status. If a COM should have its accreditation status reduced (*e.g.* Accreditation to Accreditation with Probation, *etc.*), any then existing unmet standard or element must still be met within the initial period of the award of the status. Failure to comply with the standards and elements as directed by the COCA during the 24 months period may result in withdrawal of accreditation. The COCA will specify procedures for monitoring compliance, which may include an on-site visit within two years.

#### Accreditation with Warning

Accreditation with Warning is granted when the COM is found to be non-compliant with more than three but no more than five standards and the COM exhibits weaknesses that threaten the quality of the total program. The COCA will specify the accreditation standard(s) not being met and specify the procedures for monitoring compliance. Accreditation with warning status, once final, is public and the COCA will notify all interested parties, including the USDE. The COCA and COM will publicly describe the COM's status as "accreditation with warning."

The COCA may elect to extend this period for the following good causes:

Change in Chief Executive Officer;

Change in Chief Academic Officer;

Demonstration of progress on a plan whose fulfillment would require an extension in time; or

Other substantive financial or administrative changes, which affect the operation of the COM.

Failure to bring all Standards and Elements into compliance within 24 months may result in a withdrawal of accreditation. At any time during the period a COM has accreditation with warning status, the COCA may require that COM to show cause why accreditation should not be withdrawn. The COCA will state, in writing, its reasons for taking this action. The COM will have 30 days in which to respond. The COCA will take action upon the COM's response within 30 days after its receipt.

#### Accreditation with Probation

Accreditation with Probation is granted when a COM is non-compliant with more than five standards or the COM is found to exhibit serious weaknesses in meeting the accreditation standards such that the quality of the total program is in jeopardy. The COCA will specify the accreditation standard(s) that are

not met and will specify the procedures for monitoring compliance. Accreditation with Probation status is public and the COCA will notify all interested parties, including the USDE. The COCA and COM will publicly describe the COM's status as "accreditation with probation."

The COCA may elect to extend this period for the following good causes:

- Change in Chief Executive Officer;
- Change in Chief Academic Officer;
- Demonstration of progress on a plan whose fulfillment would require an extension in time; or
- Other substantive financial or administrative changes, which affect the operation of the COM.

The COCA will determine the extension period, but the extension must not exceed 12 months. Failure to bring Standards into compliance within 12 months and the Elements into compliance within 24 months may result in withdrawal of accreditation.

#### *Teach-Out Plan*

A teach-out plan is a written plan developed by an institution that provides for the equitable treatment of a COM's students, if that COM ceases to offer its educational program before all students enrolled in that program complete their program of study. A COM placed on Accreditation with Probation must submit a written teach-out plan to the COCA within 90 days of receipt of an Accreditation with Probation decision. The plan must specify what additional charges, if any, will need to be paid by the students, and must further notify the students of those charges. The plan must also contain a signed agreement with one or more COMs to accept the students to teach-out the students at the COM under probation, if needed.

At any time during the period a COM has Accreditation with Probation status, the COCA may require that COM to show cause why accreditation should not be denied or withdrawn. The COCA will state, in writing, its reasons for taking this action. The COM will have 30 days in which to respond. The COCA will take action upon the COM's response within thirty 30 days after its receipt.

#### **Monitoring of Accredited Programs**

##### *Annual Data and Mid-Cycle Update Report*

The principal purpose of the Annual Report and Mid-Cycle Report review is to determine whether there is credible information to cause the COCA to further investigate whether a COM remains in compliance with the standards and elements. Such investigation may consist of any one or more of the following:

- Request for additional written information;
- Request to show cause as to why a COM is not in violation of a standard(s);

- Request for COM representatives to appear before the COCA;
- Focused site visit as directed; or
- Reduction in approved class size as directed by the COCA.

Failure to submit the Annual Report or Mid-Cycle Report by the due date may jeopardize the COM's accreditation status.

#### *Progress Report*

A Progress Report may be requested when Standard(s) or Element(s) are determined not to be met. The Progress Report must be submitted via the electronic accreditation system by the due date listed in the Final Action Letter. The COCA will review progress reports at the next regularly scheduled meeting of the commission and determine one of the following:

- The requirements will be determined to be “met”; or
- The requirements will be determined to be “not met”. The COCA will document any requirements for further Progress Reports. The COCA may also determine if an on-site Focused Site Visit will be conducted in lieu of another Progress Report.

#### *Interim Progress Review*

An Interim Progress Review is utilized to examine a COM's response to the findings of a previous site visit in which requirements for compliance with the accreditation standards and elements were stated.

If the COCA directs an site visit and the COM refuses to permit the visit to occur, the COCA will reduce the COM's status to Accreditation with Probation. If the COM already has a status of Accreditation with Probation, the COCA will withdraw accreditation for reasons of non-compliance with the policies and procedures of accreditation.

#### **Notifications to the COCA**

A COM must notify the COCA within five business days of any change in the following:

1. Dean and Chief Academic Officer;
2. Decrease in resources available to the COM for its medical education program, including faculty, physical facilities, or finances; or
3. Anticipated change in affiliation agreements affecting ten percent or more of the clinical education rotations.



### **Accreditation fees**

COCA accreditation fees are set by the Board of Trustees of the American Osteopathic Association upon recommendation from the COCA and accreditation staff. Contact COCA staff for a current fee schedule. Application fees are due upon submission of an application for accreditation. Annual fees are billed to each COM in December.

The direct cost of all site visits is charged to each COM. The program being evaluated is responsible for transporting the site visit team to and from the team's hotel, for arranging for site visit team meals during the day, and for arranging and funding any transportation to affiliated hospitals and to regional campuses.

### **Records for COCA Decision Making**

#### *Comprehensive Reviews with Self-Study*

The official COCA record for decision making on comprehensive review with a self-study consists of the following:

1. Self-Study document and supplemental documents as submitted by the COM;
2. Student Survey;
3. Additional needed information identified by the staff or site visit team;
4. Site visit report as submitted by the site visit team chair;
5. Historical accreditation decisions and longitudinal tracking of non-compliant Standards and Elements;
6. Factual corrections and supporting documents as submitted by the COM;
7. Third party comment;
8. COCA commissioner review (completed by two reviewers); and
9. COCA staff review.

All commissioners will receive all of the foregoing documents for decision making about a COM's accreditation status. Additional information will be accepted by the COCA, including verbal testimony at the commission meeting or additional documents submitted at the time of the COCA meeting, at the discretion of the COCA Chair.

#### *Progress Reports and Compliance Monitoring*

A COM must submit its progress reports no later than 60 days prior to the COCA meeting at which the progress report will be reviewed.

The official COCA record for decision making on a progress report consists of the following:

1. Progress report and supplemental documents as submitted by the COM;
2. Historical accreditation decisions and longitudinal tracking of non-compliant Standards and Elements;
3. COCA commissioner review; and
4. COCA staff review.

All commissioners will receive all of the above documents for decision making about a COM's accreditation status. Additional information will be accepted by the COCA, including verbal testimony at the commission meeting or additional documents submitted at the time of the COCA meeting, at the discretion of the COCA Chair.

### **Requests for Substantive Change**

Policies and procedures detailing requests for Substantive Change are contained in the *Substantive Change Policies and Procedures* document posted on the COCA website. The official COCA record for decision making on a request for substantive change consists of the following:

1. Self-Study Document and Supplemental Documents as submitted by the COM;
2. Site Visit Report, if applicable, as submitted by the Site Visit Team Chair;
3. Factual Corrections and Supporting Documents as submitted by the COM;
4. Third Party Comment;
5. COCA Commissioner Review (completed by two reviewers); and
6. COCA Staff Review.

All commissioners will receive all of the above documents for decision making about a COM's accreditation status. No additional information will be accepted by the COCA, including verbal testimony at the commission meeting or additional documents submitted at the time of the COCA meeting.

### **The Reconsideration and Appeal Process**

#### Reconsideration of a Decision

A COM may request for reconsideration of an adverse COCA accreditation decision or denial of a substantive change request. A request for reconsideration must be completed prior to filing an appeal.

A request for reconsideration may be filed by the COM's Chief Executive Officer or Chief Academic Officer within seven business days of receipt of the final action letter from the COCA. A request for reconsideration is limited to:

- Alleged bias, injustice or factual error of sufficient magnitude to warrant a reconsideration of the decision; or
- Significant departure from the standards of accreditation or established policies and procedures as defined in the document Accreditation of Colleges of Osteopathic Medicine.

A request for reconsideration should be submitted electronically to the Secretary of the COCA at [predoc@osteopathic.org](mailto:predoc@osteopathic.org). The request should be accompanied by documentation including the reason for reconsideration and specific alleged issues. While a reconsideration action will not include new information, materials that were initially submitted and believed to have not been considered properly may be emphasized in the reconsideration request.

#### Reconsideration Review

The reconsideration review will occur by the COCA Executive Committee within 7 business days of receipt. This will be a review of the submitted documents, including request for reconsideration. There will be no verbal testimony from the COM at the time of reconsideration review.

#### COCA Reconsideration Decision

The decisions to be made by the COCA following a reconsideration hearing are as follows:

- Maintain the original action of the COCA; or
- Modify the original action of the COCA.

The COCA, through the Secretary, will issue a final decision in writing to the COM on its request for reconsideration within 7 business days of the review of the request for reconsideration.

#### Appeal of a COCA Accreditation Decision

The Chief Executive Officer or Chief Academic Officer of a COM may appeal a COCA decision within 14 days of receipt of the COCA's final action on a request for reconsideration. A COM may not file an appeal unless it has first requested reconsideration of a COCA action. The COM's then current accreditation status, if applicable, will be maintained throughout the appeal process. The basis of an appeal will be limited to whether the COCA's decision was based on substantial evidence, and if not, whether there was:

- Alleged bias, injustice or error of sufficient magnitude to warrant a change in the COCA's action; or

- A significant departure from the standards of accreditation or established policies and procedures as defined by the COCA.

An appeal is intended to serve as a review of the COCA decision and is not a *de novo* review. The COM appealing the COCA's decision bears the burden to demonstrate that the decision of the COCA was in error and the decision of the COCA is not supported by substantial evidence.

Request for appeal must be accompanied by an appeal filing fee. Contact COCA staff for a current fee schedule.

Requests for appeal must be submitted electronically to the Secretary of the COCA at [predoc@osteopathic.org](mailto:predoc@osteopathic.org). The request should be accompanied by documentation including the reason for appeal and specific alleged issues. While an appeal action will not include new information, materials that were initially submitted and believed to have not been considered properly may be emphasized in the appeal request. If a request for appeal is not made, the decision of the COCA becomes final and is immediately published.

#### COCA Appeal Panel Composition

The COCA Appeal Panel consists of five members, including one public member. The appeal panel should consist of one academic, one educator, one administrator, and one practitioner, in addition to the public member. These members will be selected from a list of former COCA members who were not COCA members when the COCA made the adverse decision being appealed. The list of former COCA members eligible for participation in the COM Appeal Panel will be reviewed and approved annually by the COCA. The COCA Appeal Panel is subject to the COCA's Conflict of Interest Policy.

#### COCA Appeal Panel Hearing

Within 45 business days after receipt of the appeal, the COCA Appeal Panel will convene an appeal hearing, unless the COM agrees to a different timeline. The COM will be notified once the hearing date is established. The Appeal Panel considers the COM's basis for appeal and any written documentation submitted in support of the appeal.

The COM may be represented by counsel if desired. The COCA will be represented by legal counsel for all appeals.

The appeal record will consist of the following:

1. Self-Study Document and Supplemental Documents as submitted by the COM;
2. Site Visit Report as submitted by the Site Visit Team Chair;
3. Historical Accreditation Decisions and Longitudinal Tracking of Non-Compliant Standards and Elements;
4. Factual Corrections and Supporting Documents as submitted by the COM;
5. Third Party Comment;

6. COCA Final Action Letter;
7. Reconsideration Request;
8. Final Reconsideration Action Letter; and
9. Request for Appeal.

A quorum (simple majority) of the Appeal Panel must be present for a hearing. A quorum must include a public member.

Hearings may be held in person or via videoconference technology.

The Appeal Panel Chair shall serve as the presiding member of the Appeal Panel. The duties of the Presiding Member are:

1. Make the opening statement for the Appeal Panel;
2. Direct the course of the appeal hearing; and
3. Close the hearing.

Preliminary matters such as concerns about adequacy of the record must be handled in writing at least 14 business days prior to the appeal hearing.

The appellant COM will have 15 minutes to present its position. The COCA may offer up to 15 minutes of rebuttal to the COM presentation. The COM will then have 5 minutes to respond to the COCA rebuttal. Following presentation by the appellant COM and the COCA, the Appeal Panel may question both parties. After the presentations, the Appeal Panel will deliberate in executive session and reach a decision.

#### COCA Appeal Panel Decisions

The Appeal Panel will take final action on the appeal and provide a written decision, including a statement of the reasons for the decision, to the COCA and the COM. The Appeal Panel shall issue its decision in writing within 30 business days of the appeal hearing.

The decision of the COCA Appeal Panel shall be final and binding.

The Appeal Panel may take one of the following actions:

- Affirm the original action of the COCA;
- Reverse the original action of the COCA; or
- Remand the matter to the COCA for further consideration, with specific issues to be addressed by the COCA only upon a finding of bias, injustice, error or significant departure from the standards and procedures.

A decision to affirm or reverse adverse action is implemented by the COCA upon notification by the Appeal Panel. In a decision to remand the matter to the COCA for further consideration, the Appeal Panel must identify specific issues that the COCA must address. In a decision that is implemented by, or remanded to, the COCA, the COCA must act in a manner consistent with the Appeal Panel's decisions or instructions.

If the appeal is an appeal of a COCA decision denying accreditation, and after the exhaustion of all administrative remedies, and in the event the Appeal Panel affirms the COCA's decision, the COM may seek reinstatement of accreditation by complying with the requirements for Candidacy Status.

### **Complaint Review Procedures**

This complaint review procedure is established to protect the integrity and the maintenance of accreditation standards and procedures as they relate to COMs accredited by the COCA. Complaint procedures provide a mechanism for concerned individuals or organizations to bring to the COCA's attention information concerning specific actions and programs, which may be in non-compliance with the COCA's accreditation standards. The COCA recognizes its responsibility to provide complainants the opportunity to utilize the COCA as a vehicle to deal with specific grievances as well as being a mechanism for reviewing and finally resolving complaints against the COCA or the administrative staff.

Complaints may be filed by any individual or group including, but not limited to, the following:

- An osteopathic medical student;
- An individual, organization, or institution affected by the accreditation program academically or professionally; and
- A member of the general public.

#### *Complaint Submission about a COM*

The complaint must be in writing and signed by the complainant. All signed complaints must be submitted to the Secretary, COCA, American Osteopathic Association, 142 E. Ontario St., Chicago, IL 60611 or via email to [predoc@osteopathic.org](mailto:predoc@osteopathic.org). Complaints that are received that are not signed by the complainant(s) or are submitted anonymously will not be processed. Note: While a complaint must be signed by the complainant, the COCA does not disclose the identity of the complainant to any other third party.

A complaint must present a concern regarding a violation(s) of accreditation standards or procedures that must be based upon direct and responsible information. The complainant must provide a narrative of his/her allegation as it relates to the accredited standards or procedures and include any documentation that could support his/her allegation. This information must be accurate and well documented.

The complainant must provide evidence that an effort has been made to resolve the problem through the recommended route through COM administration, and must include information about all other actions initiated to resolve the problems before the complaint has been filed with the COCA.

Within ten (10) business days of receipt of a signed complaint, copies of the complaint will be sent to the

COM's Chief Executive Officer or Chief Academic Officer for response to the complaint. The COM's Chief Executive Officer or Chief Academic Officer will have fifteen (15) business days to respond. The complaint and the COM's response will be forwarded to the COCA Chair who will either ask the COCA Executive Committee or appoint an *ad hoc* subcommittee to determine whether the complaint merits further investigation. If the COCA Executive Committee or the *ad hoc* subcommittee finds no merit in the complaint, the complainant and the COM will be notified in writing. This process will be concluded within 15 days.

#### *Complaint Investigation*

If an investigation is warranted, the COCA Secretary, in cooperation with AOA corporate counsel and the COCA Executive Committee or the *ad hoc* subcommittee will initiate a formal review within thirty (30) days from the decision to initiate an investigation. The COCA Executive Committee or the *ad hoc* subcommittee will decide what particular the method of study and mode of investigation, is most appropriate for the complaint that has been received, which may include an on-site visit.

The COCA Executive Committee or the *ad hoc* subcommittee's findings will be forwarded to the COCA. Based upon these findings, the COCA may take either of the following actions:

- Dismiss the complaint and report that the COM is in compliance with the accreditation standards; or
- Notify the COM in question that, on the basis of an investigation, the COCA has determined that the COM is failing to meet the accreditation standards.

If the COM has been found to be out of compliance with any accreditation standard, the COCA may determine any one or more of the following methods of review:

- A report outlining the COM's plans to address the deficiencies outlined by the COCA; and/or
- A Progress Report documenting the COM's planning and its implementation of the plans; or
- An on-site visit may be recommended to determine whether a change in the accreditation status of the COM is warranted.

These procedures should be completed and the COM notified within fifteen (15) days of the COCA decision. Any such accreditation decision or action of the COCA will be subject to the reconsideration and appeal procedures set forth in these procedures.

#### *Investigation and Resolution of a Complaint Against the COCA or Administrative Staff*

The complaint must be in writing and signed by the complainant. All signed complaints must be submitted to the Secretary, COCA, American Osteopathic Association, 142 E. Ontario St., Chicago, IL 60611, or via email to [predoc@osteopathic.org](mailto:predoc@osteopathic.org).

The COCA Secretary will present the complaint, in conjunction with AOA corporate counsel, to the COCA chair, vice-chair, and, when applicable, to affected staff members. A subcommittee of the COCA

will be appointed by the COCA chair to formally review the complaint and develop a response to the complaint. This subcommittee review process and response will be completed and forwarded to the COCA within thirty (30) days of the date the subcommittee is convened.

The COCA will consider the complaint and the response at its next regularly scheduled meeting. The complainant will be invited to appear before the COCA to present respective views in order to attempt an agreed resolution. The final action of the COCA will be communicated to the complainant within fifteen (15) business days of the COCA decision.

### **Request for Substantive Change**

A COM wanting to implement a substantive change, the COM must receive prior approval from the COCA. Please refer to the document *Accreditation of Colleges of Osteopathic Medicine: COCA Substantive Change Policies and Procedures* for additional information.

### **Teach Out Plans and Agreements**

#### Conditions That Require Approval of a Teach-out Plan

The COCA requires a COM for which it is the institutional accreditor and has granted pre-accreditation or accreditation to submit a teach-out plan to the COCA for approval upon the occurrence of any of the following events:

- The Secretary of Education notifies the COCA that the Secretary has initiated an emergency action against an institution, in accordance with section 487(c)(1)(G) of the Higher Education Act of 1965 (HEA), as amended, or an action to limit, suspend or terminate an institution participating in any title IV, HEA program, in accordance with section 487(c)(1)(F) of the HEA, and that a teach-out plan is required;
- The COCA acts to withdraw, terminate, or suspend the pre-accreditation or accreditation of the COM, including placement on Accreditation with Probation;
- The COM notifies the COCA that it intends to cease operations entirely or close a location that provides one hundred percent of at least one program; or
- A state licensing or authorizing agency notifies the COCA that an institution's license or legal authorization to provide an educational program has been or will be revoked.

#### Evaluation of a Teach-Out Plan

The COCA will evaluate the teach-out plan to ensure that it provides for equitable treatment of students under the criteria listed below for teach-out agreements. The plan must specify what additional charges, if any, will need to be paid by the students, and will provide notification to the students of those charges.

If the COCA approves a teach-out plan that includes a program that is also accredited by another recognized accrediting agency, then the COCA must notify that accrediting agency of the COCA's approval of the teach-out plan. The COCA may require a COM to which it has granted Pre-Accreditation



or Accreditation to enter into a teach-out agreement as part of its teach-out plan.

#### Evaluation of a Teach-out Agreement

The COCA will only approve teach-out agreements that are between COCA accredited COMs. A COM may enter into a teach-out agreement with another institution provided that:

1. The agreement is submitted to the COCA, at least 120 days prior to the beginning of transfer of students under the agreement, for its review and approval;
2. The agreement is consistent with the accreditation standards and procedures;
3. The agreement will provide that students will receive all of the instruction promised by the closed institution but not provided because of the closure;
4. The COCA will review the teach-out plan to ensure that it provides for equitable treatment of all students. In assessing whether the plan provides for such equitable treatment, the COCA will consider the following factors:
  - All correspondence to students regarding the closing of the COM will be given to all students at the same time;
  - All students from the closed program will be notified of all potential receiving COMs;
  - In general, such instruction will be provided without additional costs and tuition charges to the student. If the program determines that additional charges are needed, the plan will specify those charges and the basis for them and such additional charges will be directly related to the cost of instruction;
  - All students are specifically notified, in writing, of any additional costs and tuition charges for each of the potential receiving COMs; and
  - Any additional costs and tuition charges for a receiving COM will be the same for all students who transfer to that COM;
5. The recipient teach-out institution will demonstrate that it has the necessary experience, resources, and support services to provide an educational program that is of acceptable quality and is reasonably similar in its content, structure, and scheduling to that of the institution that is ceasing operations either entirely or at one of its locations;
6. The recipient teach-out institution will demonstrate that, during the period of the teach-out agreement, it will remain stable, carry out its mission, and meet all obligations to its existing students.
7. The closed institution will strive to provide for student placement in geographic proximity to the closed institution; and
8. The recipient institution COM(s), in order to take additional students from the closed institution, must

request an increase in class size through the substantive change process.

#### Closed Institutions Without A Teach-Out Plan or Agreement

In the event that a COM having any accreditation status from the COCA closes without a teach-out plan or agreement, the COCA will collaborate with the USDE and the appropriate state agency(ies), to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charges.

#### Requirements of The United States Department of Education

##### *Activities by the COCA*

The COCA will submit to the USDE the following:

- A summary of the COCA's major accrediting activities during the previous year (an annual data summary), if requested by the Secretary;
- A decision by the COCA to expand its scope of recognition to include distance education or correspondence education as provided in section 496(a)(4)(B)(i)(I) of the HEA, which will become effective on the date the USDE receives the notification;
- The name of any COM that the COCA accredits that the COCA has reason to believe is failing to meet its Title IV, HEA program responsibilities, or is engaged in fraud or abuse, along with the COCA's reasons for concern about the institution or program; and
- If the Secretary requests, information that may bear upon a preaccredited or accredited COM's compliance with its Title IV or HEA program responsibilities, including the eligibility of the institution or program to participate in these programs.

Ordinarily, the COCA will copy the affected COM on any correspondence with the USDE as described in this section. The need for confidentiality of that contact, based upon the circumstances, will be considered on a case-by-case review. Upon request by the USDE, the COCA must consider that contact confidential.

##### *Adverse Decisions*

The COCA will provide written notification regarding its accreditation decisions to the Secretary of the USDE, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and the public at the same time as provided to the COM, and within 30 days after it makes either of the following decisions:

- Final decision of warning or probation or equivalent status of an institution or program; or
- Final decisions to deny, withdraw, suspend, revoke, or terminate the candidate status, pre-accreditation, or accreditation of an institution or program.

A brief statement summarizing the reasons for the agency's decision, describing the evidence that the affected institution or program was given the opportunity to provide comments, and the comments, if any, that the affected institution or program may have made with regard to that decision will be provided to the Secretary of the USDE, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and the public, no later than 30 days after the final decisions.

#### *Annual Information*

The COCA will make available to the USDE, on an annual basis, a copy of the following:

- A copy of the COCA's annual report to the AOA House of Delegates; and
- An updated copy of the directory of COMs having recognition status from the COCA.

#### *Correspondence with the USDE*

The COCA is required to provide the USDE with specific information as prescribed in 34 CFR 602.27.

#### *Distance Education*

The USDE gives accrediting agencies the authority to conduct accreditation of programs offered solely by distance education. The COCA accredits osteopathic medical schools. The COCA encourages all its accredited schools to be innovative and to use multiple methods of instruction to deliver their curriculum. The COCA, however, does not accredit stand-alone on-line medical school programs. The COCA believes that the science and art of osteopathic medicine must be gained by direct, in person interaction with instructors and clinical education supervisors. For this reason, the COCA will not accredit programs offered by distance education as defined at 34 CFR 602.3.

#### *Noncompliance*

Noncompliance with any accreditation standard must be corrected promptly. The COCA is bound by the regulations of the USDE to ensure that each area of non-compliance cited in a letter of accreditation has been brought into compliance within two years. If the COCA determines that a program is out of compliance with any standard or element, the USDE requires that the COCA must:

- Require the program to take appropriate action to bring itself into compliance with the standard within two years, or
- Immediately initiate an adverse action against the COM.

For purposes of meeting this regulatory requirement, the USDE defines an adverse action as denying or withdrawing the accreditation of a program. Probation is not considered an adverse action that would trigger the USDE requirement for the COCA to take the actions noted above.

Failure to achieve compliance within two years constitutes grounds for denial or withdrawal of accreditation unless the period for achieving compliance is extended, at the discretion of the COCA, for good cause shown.

Extensions for good cause are made in the COCA's sole discretion according to the following criteria:

- The COM has demonstrated significant progress towards the resolution of its non-compliance issues (for example, a program addressing non-compliance with multiple standards has achieved compliance with the majority of those standards);
- The COM has provided written and compelling evidence describing its plans to come into compliance within the period of extension (for example, a COM has documented the commitment of financial and human resources to resolve all remaining non-compliance issues within the period of extension);
- The COM has provided written and compelling evidence that the nature of the change that must be made (such as facilities construction or renovation, fundraising for scholarships) reasonably requires a time period exceeding twenty-four months; or
- The COM has provided documentation of the need for actions by groups external to the medical education program (such as decisions by university or legislative bodies).

The COCA may, in its sole discretion, extend the period to permit a COM to achieve compliance for good cause up to 12 months beyond the standard two-year period within which to achieve compliance. In its communication with a COM, the COCA will specify the reason(s) that an extension for good cause has been granted and the period within which the medical education program must come into compliance with the cited standard(s).

#### *Proposed Changes in Standards and Procedures*

The COCA will notify the USDE of any proposed changes in its standards and procedures that might alter:

- Its scope of recognition, or
- Its compliance with the criteria for recognition by the Secretary.

#### **Responses to Actions of Other Oversight and Accrediting Bodies**

The COCA will not grant accreditation to, or continue the accreditation of, programs within institutions where a state chartering authority or a regional accrediting agency has made a decision to: 1) deny accreditation, pre-accreditation, or a charter to operate to the institution; or 2) suspend, revoke, withdraw, or terminate the institution's accreditation or charter to operate.

The COCA will reconsider the accreditation status of a program when the institution offering the program has been placed on probation by a regional accrediting agency or state chartering authority. In the case of a probation decision, the COCA will determine whether to grant or continue accreditation based on a review to determine if the areas cited by the regional accreditation agency or state chartering authority as the reasons for the probation action represent noncompliance with one or more COCA accreditation standards.

If the COCA decides to grant or continue accreditation, it will provide to the Secretary of Education, within 30 days of its action, a thorough and reasonable explanation, consistent with its standards, of why the actions of the other agency to place the institution on probation do not preclude the granting of COCA accreditation.

#### **Title IV**

The COM and, where applicable, its parent institution will document performance of its students and graduates relative to Title IV default rates based on the most recent data provided by the Secretary of the USDE. The COM and, where applicable, its parent institution must document compliance with all necessary responsibilities under Title IV of the 1965 Higher Education Act as most recently amended, and the resulting regulations issued by the Secretary at 34 CFR Part 602, 34 CFR 667, and 34 CFR 668 and other enabling regulations.

#### **USDE Notification of Initial and Continuing Accreditation Decisions**

The COCA will provide written notification regarding its accreditation decisions to the Secretary of the USDE, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and the public within 30 days after the decision to:

- Award initial and continuing Candidate Status;
- Award initial and continuing Pre-Accreditation; and
- Award initial and continuing Accreditation.

#### *Withdrawal or Lapses of Accreditation*

The COCA will notify the Secretary of the USDE, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public within 30 days of receiving notification from the institution or program if it has decided to withdraw voluntarily from Candidate Status, Pre-Accreditation or Accreditation. The COCA will notify the Secretary of the USDE, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public within 30 days of the date on which accreditation or pre-accreditation lapses if the institution or program notifies the COCA that it will not request renewal of its pre-accreditation or accreditation status.