

American Osteopathic Association

Commission on Osteopathic College Accreditation

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

Effective August 24, 2023



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Introduction

These Policies and Procedures govern the implementation of Commission on Osteopathic College Accreditation (COCA) processes and articulate the procedures used to accredit 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 made concerning 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 accreditation types in higher education.

- Programmatic (specialized and professional) accreditation conducts an in-depth assessment of specialized or professional programs at a college, university, or independent institution.
- 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 (a) educational programs culminating in the award of the DO degree meet reasonable, generally-accepted, and appropriate national standards for educational quality; and (b) 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 *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards* and *Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards* available electronically on the COCA website (www.aoacoca.org). Programs judged by the COCA to meet national standards of quality are designated as “accredited” for up to ten (10) 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 freestanding colleges of osteopathic medicine (COMs) and a programmatic accrediting agency for COMs that exist within larger institutions that have another

institutional accreditor.

The Secretary of the USDE has recognized the COCA as an accrediting agency. Under 34 CFR §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 (“Provisional Accreditation”) of freestanding institutions and distance learning education programs of osteopathic medicine and of osteopathic medical programs leading to the degree of Doctor of Osteopathy or Doctor of Osteopathic Medicine throughout the United States.

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://www2.ed.gov/admins/finaid/accred/accreditation_pg4.html#National_Institutional

Honorary Doctor of Osteopathic Degrees

To maintain the integrity and academic standards of its accredited programs of osteopathic medicine, the COCA prohibits issuing honorary Doctor of Osteopathic Medicine/Doctor of Osteopathy (DO) degrees. While honorary degrees may serve as a means of recognizing individuals, they are susceptible to misuse and abuse. They may undermine the credibility and value of a legitimate DO degree and may be misinterpreted as a valid medical degree, which could pose harm to the public.

COCA Membership

See the *COCA Handbook*.

Training of COCA Members

New COCA members are supplied with all relevant standards documents, policy and procedure documents, handbooks, and manuals prior to assuming their duties. New COCA members must undergo training before commencing a term of service. Such training focuses on outcomes and competencies that COCA members should have and includes training on the COCA’s standards, policies, and procedures and USDE 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.

Education on COCA Standards

The COCA will provide annual presentations at appropriate conferences where stakeholders are already present, such as those held by the American Association of Colleges of Osteopathic

Medicine (AACOM) and the AOA, to provide accreditation updates and standards compliance education to ensure COMs are informed and educated regarding the COCA's actions and standards.

Meetings

The COCA meets in regular session four times each year – in April, June, August, and December – 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 at <http://www.aoacoca.org>.

The COCA will conduct its meetings in a hybrid format (simultaneously virtual and in person). COM testimony will not occur unless requested by the COCA. The COCA will receive oral reports and comments from invited guests in an open-session format. Any testimony review that the COCA deems confidential, such as deliberations on accreditation decisions, review of progress reports, substantive changes, and other accreditation actions of COMs, will occur in closed session.

COCA members may participate in regular or special meetings via any means of communication that allows all participants to simultaneously communicate with each other, such as teleconference or video conference. If a meeting is conducted by such means, the Chair will 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 will 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 have the affirmative votes of all COCA members.

Observers

COCA meetings are generally open to the public, although there are times that business may be conducted in executive session that is not open to the public. In closed sessions, observers may attend if a request is approved in advance. U.S. and international medical educators and individuals from other disciplines involved in U.S. higher education or the accreditation process may submit a request to observe. Requests must be made in writing to the COCA Secretary and require prior approval by the COCA Executive Committee (COCA EC). Observers must agree in writing to hold all meeting materials and results of COCA discussions in strict confidence.

Special Meetings

The Chair and Vice Chair, in consultation with the COCA staff, may call a special meeting to deal with any issues that they determine cannot wait until the next regularly scheduled meeting.

Executive Session

Although the COCA generally conducts its meetings in an open format, in some instances the COCA will conduct its business in executive session. For example, the COCA will employ

executive session for testimony that it deems as confidential, such as deliberations on accreditation decisions, review of progress reports, substantive changes, and other accreditation actions. In addition to executive sessions at COCA meetings, the COCA holds a separate, closed, executive working session in June each year, and as otherwise needed.

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 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 COCA meetings are guided by the current edition of *Robert's Rules of Order* on all matters not otherwise addressed in these Policies and Procedures. A quorum shall consist of a simple majority of the COCA's voting members.

COCA Actions

The COCA will act to approve or deny accreditation based on the Policies and Procedures adopted in this manual. The COCA may defer a decision to a specific time 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.

Following the review and deliberation of a COM's compliance with accreditation standards or policies, the COCA (or with the COCA's approval, the COCA EC) may determine compliance as follows:

Met: A finding of "met" indicates that all requirements of the element or standard are met. No further action is required.

Not Met: A finding of "not met" indicates that the COM is non-compliant with the requirements of the element or standard. Upon a finding of "not met," the COCA will require a progress report to be submitted for review at a future meeting of the COCA or the COCA EC.

Decisions of "not met" must include each requirement necessary to bring the element into compliance through a progress report. A progress report must include a submission due date for the COCA's or the COCA EC's review, which can be no more than twenty-four (24) months following the determination of non-compliance.

Met With Monitoring: This finding is primarily used for new and developing COMs or for COMs under a substantive change (branch campus, additional location, etc.).

Elements found by the COCA to be "met with monitoring" are determined to be met based on the information available at the time of the review but require additional assessment to

ensure that the COM is in full compliance with the requirements in the future. Elements and standards found to be “met with monitoring” are considered met when determining a COM’s accreditation status.

Decisions of “met with monitoring” must include each requirement of the element that is being monitored and a due date for the monitoring reports to be submitted for the COCA’s or the COCA EC’s review. Monitoring will end when the COCA or the COCA EC determines that the COM is in full compliance.

Deferred Decision: The COCA may defer a decision on compliance and request that the COM submit additional written information for the COCA’s or the COCA EC’s review at a future meeting.

Show Cause

The COCA or the 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 will be issued when the COCA or any COCA member learns that a COM may be non-compliant 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 either virtually or in person at the next COCA meeting to present the COCA with factual and/or legal reasons why the COCA should not find the COM as non-compliant. If the “show cause” letter is issued at the instruction of the COCA EC, it will be circulated to the entire COCA membership before or at the same time as it is issued to the COM or other entity. A COM issued a “show cause” letter will be assessed a “show cause” assessment fee as outlined in the COCA Fee Schedule. Contact COCA staff for a current fee schedule.

The COCA will be responsible for the expenses of individuals invited to attend meetings at the specific request of the Chair, including transportation, housing, and meal expenses as allowed under the AOA Travel Policies. The COCA will not be responsible for the expenses of individuals attending the COCA to offer (a) testimony on a COM’s behalf; (b) commentary regarding revisions to a COCA document; or (c) third-party comment on a proposed action.

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 if such persons have a need to know such information.

Premature and/or unauthorized disclosure of information that reflects visiting team or COCA views concerning a COM’s accreditation status is prohibited.

Except for information that is presented in the COCA’s open sessions, COCA members and visiting team members lack authorization under any circumstances to disclose any information obtained during site visits except to authorized COM personnel as approved by the COCA Secretary.

Except for reporting required by the Secretary of the USDE, it is the COCA's obligation to maintain the confidentiality of its relationships with its COMs and to not 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.

COM Directory

The COCA will publish on its website a list of COMs with a Pre-Accreditation or Accreditation status that includes the following information: name, address, phone number, and web site of the COM; name and title of the Dean; established date (date granted Pre-Accreditation status); year of last accreditation site visit; year of next accreditation site visit; and accreditation status.

A separate list will be published containing the names of proposed COMs in Candidate status. The COCA does not announce the names of COMs in Applicant status.

Confidentiality and Conflict of Interest Policy

This section serves as a comprehensive statement on the confidentiality and conflict-of-interest policies for the COCA and its constituent committees and subcommittees, which will hereafter be included in all references to "the COCA" within this section. The policy statement in this section 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. This policy is intended to facilitate the disclosure and resolution of conflicts of interest. These policies are applicable to the COCA commissioners, COCA staff, members of the Evaluators Registry participating as site visit team members, the COCA Appeal Panel, and consultants (herein 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 by COCA members. Any information provided as part of one's role with the COCA must not be shared, forwarded, copied, distributed, or discussed with individuals outside of its intended audience nor outside of the purpose for which it was provided. No individual may utilize confidential information for their personal advantage or for the advantage of any other entity.

With respect to conflicts of interest, the policy of the COCA is to err on the side of caution to safeguard the COCA's integrity. COCA members must 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 even where no conflict of interest exists. The following conflict-of-interest policy is consistent with

each COCA member's responsibilities under the duty of loyalty¹ and the duty of obedience.²

Ultimately, there is no agreed upon classification of what constitutes a conflict of interest. In simplest terms, a conflict of interest arises whenever an individual COCA member may be influenced in his or her 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:

- A business or financial relationship with an individual or program under consideration;
- A direct familial relationship with an individual or an officer of an entity under consideration;
- An employment, student, or consulting (current or within the last five (5) years) relationship with an entity under consideration; or
- An employment, student, or other relationship with a competitor of a program under consideration.

The primary responsibility for disclosing 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 a COCA site review assignment. The COCA Chair or the COCA Secretary will determine whether a conflict of interest exists and how it will be resolved (e.g., recusal from a discussion or survey activity).

A COM may request that a commissioner be recused from the deliberation and vote on its application/site visit review if a potential conflict of interest is suspected. The COCA Secretary, in consultation with the COCA Chair or Vice Chair, will discuss the request with the commissioner prior to determining whether the commissioner will be recused.

Any commissioner that participates on a site visit must recuse themselves from the discussion and vote of the COM being reviewed during the COCA's deliberation.

Conflict of Interest forms will be collected from COCA members.

Consultations

No current COCA commissioner or COCA staff may act as a paid or an unpaid external consultant on COCA accreditation matters to any program or institution subject to COCA accreditation.

A COCA site evaluator may not participate in a site visit to any COM for which they have acted as a consultant on accreditation matters within five (5) years prior to the site visit.

1 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, that individual is expected to take actions based on what is in the best interest of the AOA's COCA rather than what might be in the best interest of the particular organization of which he or she is also a member.

2 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 a corporate body's behalf, they are expected to apply that judgment with respect to the corporate body's existing standards, policies, and procedures. In making decisions that demonstrate the duty of obedience, an individual will know, understand, consider, and follow the standards, policies, and procedures appropriate to the matter to be decided.

Development and Review of Accreditation Standards

In establishing procedures for the accreditation documents review, the COCA 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 occur approximately every five (5) years. The COCA will announce the review process via the COCA website, <http://www.aoacoca.org/>, and through direct correspondence to COM Deans and related organizations. 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 will ask respondents to evaluate the accreditation document as it relates to (a) the quality of osteopathic medical education, and (b) the relevancy of the educational training needs of osteopathic medical students. The COCA will solicit comments from a representative group of constituents, including but not limited to representatives from all accredited and pre-accredited COMs and proposed COMs in Candidate status.

Changes will be made 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* only after providing at least thirty (30) days' notice and an opportunity for comment by affected persons, institutions, and organizations. Substantive changes to existing standards and elements that 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 twelve (12) months to initiate any needed changes.

At the discretion of the COCA and by majority vote, the COCA may modify the accreditation standards documents, substantive change policies, or this policy manual to clarify requirements, align requirements with COCA policies and procedures, or correct grammatical errors without soliciting public comment.

Final decisions 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 its 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 must 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 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 criteria for accreditation, particularly those 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 is determined to have engaged in fraud or abuse may be considered as in violation of COCA standards and may be subject to sanctions or accreditation withdrawal. The COCA will report suspected incidents of fraud or abuse to the USDE, institutional 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 COCA's sound discretion. The COCA does not typically 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 a partial or full accreditation report in such a manner that misrepresents or distorts the COCA's report, 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 of 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.

Record Retention Policy

The USDE requires that all accrediting agencies recognized by the U.S. Secretary of Education meet requirements as specified at 34 CFR §602. One of 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 visit reports, progress reports, mid-cycle reports, and appeals), self-study reports, substantive changes, and other related correspondence will be maintained in the COCA office for the greater of five (5) years or two (2) accreditation cycles.

Other accreditation documents that must be kept are:

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

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

COCA meeting materials and related correspondence will be maintained for five (5) years. All other materials related to meeting arrangements will be maintained for one (1) year and discarded thereafter.

Other committee materials and related correspondence will be maintained for five (5) years and discarded thereafter.

Miscellaneous correspondence will be maintained for five (5) years and then discarded. Examples of this type of correspondence could be inquiry letters or information requests.

Reporting of COCA Accreditation Actions

To Institutions

Within thirty (30) days of any final COCA action taken on the reports of full or limited visits, the Accreditation staff will send a Final Action Letter conveying the COCA's action to the COM's Dean or other equivalent position. 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 COCA will keep the Final Action Letter confidential, but the COM may disclose it at its discretion.

To External Groups and the Public

The COCA will submit required notifications to the Secretary of Education, the relevant state medical licensing boards, the relevant institutional accreditation bodies, and the public about actions taken at a COCA meeting affecting accreditation within thirty (30) days of the meeting, including the decision to award initial accreditation or 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 the Secretary of the USDE, the relevant state medical licensing boards, and the relevant institutional accrediting bodies 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 the accreditation action on the COCA website within twenty-four (24) hours of notifying the COM.

In decisions to deny or withdraw accreditation, the COCA will provide the Secretary of Education, the relevant state medical licensing boards, the relevant institutional accrediting bodies, and the public with a summary of the facts of its review no later than sixty (60) days after the decision is finalized along with any comments made by the program or with the statement that the program has been offered the opportunity to comment. The COCA website will also reflect that 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 Secretary of the Education and the relevant institutional accrediting bodies, and the relevant state licensing agencies within thirty (30) days of the withdrawal or lapse date.

The accreditation information posted on the COCA's website that is 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 publicly discloses its accreditation status, the COM must disclose the status accurately. Any incorrect or misleading statements made by a COM about the COCA's accreditation actions or the COM's accreditation status must be corrected immediately. Failure to promptly correct or clarify the information may result in reconsideration of the COM's accreditation status. The public information must also include the COCA's contact information so that the information can be verified.

Research

The COCA staff may conduct research, or contract with a third party to conduct research with the COCA's approval, 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 will 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 permitted by the confidentiality requirements and data-sharing agreements of the AOA, as the sponsoring organization.

Revision of This Policy and Procedure Manual

The COCA may modify the application of these Policies and Procedures at the COCA's discretion and by majority vote.

Third-Party Comment

The COCA provides opportunity for third-party comment about COMs undergoing review for Candidate, Pre-Accreditation, or full Accreditation status. The COCA will also provide opportunity for third-party comment on substantive change or teach-out agreement requests. 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 non-compliance with accreditation standards or 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 COCA will address the COM's accreditation status. 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 keep the individual's identity confidential. The COM will be notified of the third-party comment so that it has an opportunity to comment. Notice of an opportunity to submit third-party comment will be provided with the COCA meeting's announcements on the COCA website at www.aoacoca.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 has knowingly supplied false or misleading information or has failed to supply relevant material information to the COCA, 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, proposed COM seeking accreditation, or an accredited COM seeking ongoing accreditation begins with the COM submitting an application and/or self-study report demonstrating compliance with applicable COCA standards. When required, COCA evaluators will conduct an on-site review and submit a site visit report to the COCA. Two COCA members will be assigned to review the self-study report, the site visit report, and any additional documentation submitted to present 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 and defer an accreditation decision.

Self-Study

The primary purpose of the self-assessment activity and resulting self-study report is to enable COMs to devise a self-appraisal and improvement system 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 its strengths and weaknesses. 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 report must be submitted via the COCA electronic accreditation system at least ninety (90) days prior to the scheduled on-site visit or the COCA meeting at which the COCA will address the self-study report if no site visit is required. Access to the self-study report in the electronic accreditation system is granted by the COCA accreditation staff; the staff may be contacted via email at predoc@osteopathic.org.

Preparation of Materials for COCA Meetings

To help ensure that COCA commissioners focus their work on the highest level of review:

- COCA staff will review all self-study reports, applications, and other reports prior to submitting them to the COCA for review.
- All materials must have a complete response for each of the submission

- requirements. Incomplete materials will not be forwarded to the COCA for review.
- If COCA staff determine that materials are incomplete while reviewing them, staff will confer with the program personnel to help clarify the requirements.
 - The Vice President of Accreditation or the COCA Secretary will determine whether to delay forwarding materials to the COCA. When necessary, the Vice President of Accreditation or the COCA Secretary will confer with the COCA Chair and Vice Chair for guidance.
 - If a decision to delay forwarding materials to the COCA occurs, the COM's Dean will receive written communication of the delay noting the missing required information.
 - The Vice President of Accreditation or the COCA Secretary will notify the COCA Chair and the COCA EC whenever he or she decides to delay forwarding materials to the COCA for review.
 - The COCA will receive a report of unforwarded materials at its next regularly scheduled meeting.

Site Visit

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

A comprehensive site visit typically requires two (2) to three (3) days on site to complete.

COCA staff considers several criteria when 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 USDE (see §602.15(a)):

- Administrative personnel;
- Educators;
- Academic personnel; and
- Osteopathic medical practice practitioners.

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 determine whether to permit a change in site visit personnel.

A site visit team may also include a site visit evaluator trainee and/or an observer when appropriate. Observers may accompany site visit teams upon formal request and if the COCA Secretary approves. No observer may 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 that may have a legitimate accreditation responsibility, may also accompany on-site visit teams. Each observer's respective organization will pay any costs incurred by the observer.

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 Accreditation With Probation status, the COCA will withdraw accreditation for non-compliance with the accreditation policies and procedures.

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 the COCA deems necessary.

A focused site visit typically requires one (1) to two (2) days on site and will focus on specific standards and elements as determined by the COCA. However, if the team identifies critical information pertinent to other standards and elements during the focused on-site visit, the team may document these observations in the site visit report. The COCA may then further review these observations.

Applicant Status

Applicant status is the initial step in seeking accreditation. This status does not have accreditation rights or privileges and does not establish or imply the COCA's recognition. 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 the COCA's recognition, which will be publicly announced. Candidate status may be granted to COMs that are in compliance with all required standards and elements published in the *Accreditation of Colleges of Osteopathic Medicine: New & Developing Accreditation Standards* demonstrating the planning and resources necessary to proceed to Pre-Accreditation status within two (2) years.

Candidate Status Self-Study and Evaluation

Upon receiving a completed Candidate Status Self-Study Report, the COCA will review the documents to determine whether the materials are technically complete. A self-study report is complete if in the event a site visit were authorized, a site visit team could reasonably expect to find

evidence on site that corroborates the contents of the self-study report and could assess the proposed COM's compliance with Candidate status standards and procedures. The COCA will review the self-study report within ninety (90) days of receiving the materials following the Accreditation staff's review and analysis.

While reviewing the materials, the COCA may determine that one or more elements are technically incomplete and may request additional information before issuing a decision on Candidate status. The COCA reserves the right to review this information either by (a) teleconference or (b) a vote via email.

Once the COCA determines that the documents are acceptable and appear to be compliant, the COCA will award Candidate status.

Candidate Status Decisions

Upon receiving the Candidate status application from proposed COMs with Applicant status, the COCA will:

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

Activities Prohibited During Candidate Status

A COM with Candidate status is prohibited from:

- Recruiting students in any manner, including by solicitation;
- Soliciting or collecting application fees;
- Collecting application information, including academic transcripts, Medical College Admissions Test (MCAT) scores, and recommendation letters;
- Initiating the admission review process;
- Scheduling interviews for any potential applicants;
- Offering advice on financial aid;
- Issuing admission letters for the COM; or
- Offering instruction.

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 is unable to proceed to Pre-Accreditation status within twenty-four (24) months of achieving Candidate status, the COCA will

withdraw the COM's Candidate status. In the event that a COM's Candidate status is withdrawn, the COM must file a new application along with a new Candidate Status Self-Study Report and submit a new application fee if the COM desires to achieve Candidate status again.

Pre-Accreditation Status

The COCA may grant Pre-Accreditation status to COMs that have achieved Candidate status and meet the Pre-Accreditation status standards published in the *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*. A Candidate COM must submit a Pre-Accreditation Self-Study Report and undergo a pre-accreditation comprehensive site visit to demonstrate that it meets the standards.

Timetable to Achieve Pre-Accreditation

COMs may submit the Pre-Accreditation Self-Study Report as soon as they receive Candidate status and fund the Escrowed Teach-Out and Operating Reserve Accounts. However, the Pre-Accreditation Self-Study Report must be submitted at least eighteen (18) months prior to the COM's intended opening date and ninety (90) days before the COCA meeting at which the COCA will review the self-study report. This schedule will permit the orderly progression for the COM to begin its inaugural class.

Pre-Accreditation Site Visit

Upon receipt of a completed Pre-Accreditation Status Self-Study Report, the COCA will review the documents to determine whether the materials are complete. A self-study report 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 that corroborates the contents of the self-study report and could assess the proposed COM's compliance with the Pre-Accreditation status standards and procedures. Upon approval, a Pre-Accreditation site visit will occur to ensure the accuracy of the Pre-Accreditation Self-Study Report. This site visit will occur within sixty (60) to ninety (90) days of the COCA approving the Pre-Accreditation Self-Study Report.

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

Pre-Accreditation Status Accreditation Decisions

After a COM with Candidate status applies for Pre-Accreditation status, the COCA will:

- Approve the proposed COM to advance to Pre-Accreditation status if the COM meets or exceeds the Pre-Accreditation status standards;
- Defer the decision if the COCA finds that the COM does not meet a limited number of Pre-Accreditation status requirements and if the COCA believes that the applicant may meet the requirements by the next COCA or COCA EC meeting;
- 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 Pre-Accreditation status

- standards but has not exceeded the maximum Candidate status term; 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 met or exceeded the maximum Candidate status term.

Activities Allowed During Pre-Accreditation

Upon receiving Pre-Accreditation status, the COM will have the right and privilege to solicit applications, 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 status until the COM has received Accreditation status from the COCA.

Pursuant to 34 CFR §602.16(a)(2), a COM may not hold Pre-Accreditation status for more than five (5) years. Pre-Accreditation status will be awarded and be 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, 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

The COCA will annually review the COM's Pre-Accreditation status via submitted written reports until the COM achieves Accreditation status. 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 (1) year if the COM is clearly meeting or exceeding the accreditation standards; or
- Deny the request and deny Pre-Accreditation status citing the unmet accreditation standards; such termination will be published within thirty (30) days of final action.

If the COM is unable to proceed to Accreditation status within five (5) years of achieving Pre-Accreditation status, Pre-Accreditation status will be withdrawn, and the teach-out agreement will 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 after the COCA grants Accreditation status to the COM or five (5) years after the date that the COM received Pre-Accreditation status if the COM has not yet advanced to Accreditation status.

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

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- Award Accreditation status if the COM meets or exceeds the accreditation standards; the accreditation date 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 COM does not meet the accreditation standards; such termination will be published within thirty (30) days of final action.
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Accreditation Status

Accreditation status is the highest level of accreditation awarded, and it confers all rights and privileges of accreditation. Once accredited, an educational program leading to the DO degree remains accredited until the program voluntarily terminates its Accreditation status or until the COCA terminates the program's Accreditation status 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 accreditation statuses.

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 (10) years. Monitoring is conducted through submission of the COCA annual report and the mid-cycle report that are due in the fifth year of accreditation. This status is not available to newly accredited COMs progressing from Pre-Accreditation status or following an accreditation status of "Accreditation with probation" or "Accreditation with warning."

Accreditation: This status indicates that a COM is compliant with all standards. However, there may be unmet non-core elements that must be addressed through progress reports. For COMs with this status, accreditation will be granted for seven (7) years. Monitoring is conducted through submission of the COCA annual report and the mid-cycle report that are due in the third year of accreditation. COMs with all elements met achieving accreditation for the first time from Pre-Accreditation status will receive this status for six (6) years with a mid-cycle report due in the third year of accreditation.

Accreditation With Finding: This status indicates that a COM is non-compliant with one standard (including non-compliance with one or more core elements within a standard) and ongoing monitoring will occur through progress reports, annual reports, and other monitoring that the COCA deems appropriate. For COMs with this status, accreditation will be granted for five (5) years. A mid-cycle report is due in the third year of accreditation.

Accreditation With Monitoring: This status indicates that a COM is non-compliant with two standards (including non-compliance with one or more core elements within each standard) and ongoing monitoring will occur through progress reports, annual reports, and other monitoring the COCA deems appropriate. For COMs with this status, accreditation will be granted for four (4) years. A mid-cycle report is due in the second year of accreditation.

Accreditation With Warning: This status indicates that a COM is non-compliant with

more than three but no more than five standards (including non-compliance with one or more core elements within each standard) and that the COM exhibits weaknesses that threaten the total program's quality. Ongoing monitoring will occur via progress reports and any other monitoring the COCA deems appropriate (e.g., focused site visits).

For schools with this status, accreditation will be granted for two (2) years. The mid-cycle report will be submitted with the annual report. The COCA will specify the unmet accreditation standard(s) and specify the procedures for monitoring compliance. Once final, Accreditation With Warning 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 warning."

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

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

Failure to bring all standards and elements into compliance within twenty-four (24) months may result in an accreditation withdrawal. At any time while a COM has Accreditation With Warning status, the COCA may require the COM to show cause as to why accreditation should not be withdrawn. The COCA will state in writing its reasons for taking this action. The COM will have thirty (30) days to respond. The COCA will take action on the COM's response within thirty (30) days of its receipt.

Accreditation With Probation: This status is granted when a COM is non-compliant with more than five standards (including non-compliance with one or more core elements within each standard) or when the COM exhibits serious weaknesses in meeting the accreditation standards such that the quality of the total program is jeopardized. The COCA will specify the unmet accreditation standard(s) and 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 (Dean of the COM);
- Demonstration of progress on a plan whose fulfillment would require an extension in time; or
- Other substantive financial or administrative changes that affect the operation of the COM.

The COCA will determine the extension period, but the extension must not exceed twelve (12) months. Failure to bring standards into compliance within twelve (12) months and the elements into compliance within twenty-four (24) months may result in accreditation withdrawal.

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.

Beginning August 1, 2023, the accreditation status of a COM with Accreditation With Heightened Monitoring due to non-compliance with one standard will change to Accreditation With Finding. The accreditation status of a COM with Accreditation With Heightened Monitoring due to non-compliance with two standards will change to Accreditation With Monitoring. Only the accreditation status title will change; the timeline to the next comprehensive review will remain the same.

Reduction in Accreditation Status

While a COM's failure to comply with the standards is the typical reason for any accreditation status reduction, the COCA may order a COM to show cause as to why its accreditation status should not be reduced or withdrawn following a COM's failure to comply with any COCA standard, element, policy, procedure, or directive.

The COCA will specify the unmet standard(s) and element(s) at the time of its review. All COMs, regardless of accreditation status, must bring all standards and elements into compliance within twenty-four (24) months of the initial status award. If a COM has its accreditation status reduced (e.g. Accreditation to Accreditation With Probation, etc.), any existing unmet standard or element must still be met within the initial period of the status award. Failure to comply with the standards and elements as directed by the COCA during the twenty-four (24) months may result in accreditation withdrawal. The COCA will specify procedures for monitoring compliance, which may include an on-site visit within two (2) years.

Change in Accreditation Status

Upon the request of a COM and with COCA majority vote, the COCA may elect to change an accreditation status of a COM with Accreditation With Finding or Accreditation With Monitoring status to an accreditation status of Accreditation once the COCA determines that the standard's requirements have been met. Only the accreditation status title will change; the timeline to the next comprehensive review will remain the same.

Monitoring of Accredited Programs

Annual Data and Mid-Cycle Update Report

The principal purpose of the annual report and the mid-cycle report review is to determine whether

there is credible information for 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 one or more standards;
- 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 the mid-cycle report by the due date may jeopardize the COM's accreditation status.

Progress Report

A progress report may be requested when any are determined not to be met. The progress report must be submitted by the due date listed in the Final Action Letter. The COCA, or the COCA EC if the COCA grants such a review, will review progress reports at the commission's next regularly scheduled meeting and determine one of the following:

- The requirements are "met;" or
- The requirements are "not met." The COCA will document any requirements for further progress reports. The COCA may also determine if a focused site visit will be conducted in lieu of another progress report.

All COMs, regardless of accreditation status, must bring all standards and elements into compliance within twenty-four (24) months of the initial award of the status. Failure to comply with the standards and elements as directed by the COCA during the twenty-four (24) months may result in a reduction of accreditation status or withdrawal of accreditation. The COCA will specify procedures for monitoring compliance, which may include an on-site visit.

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

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

Interim Progress Review

An Interim Progress Review examines a COM's response to previous site visit findings, which stated requirements for compliance with the accreditation standards and elements.

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 non-compliance with the accreditation policies and procedures.

Notifications to the COCA

A COM must notify the COCA within five (5) business days of any change in the following:

- Dean and/or Chief Academic Officer;
 - A change in the Dean during Candidate status requires re-initiating the Candidate status application process.
 - A change of Dean during Pre-Accreditation status, until graduation of the first class of students, requires a comprehensive visit to occur not less than six (6) months after notification that the Dean has changed.
- Decrease in resources available to the COM for its medical education program, including faculty, physical facilities, or finances, that would adversely affect the delivery of the osteopathic medical education program; or
- Anticipated change in affiliation agreements affecting ten percent or more of the clinical education rotations.

Accreditation Fees

COCA accreditation fees are set by the AOA Board of Trustees upon recommendation from the COCA and Accreditation staff. Contact COCA staff for a current fee schedule. Application fees are due upon submitting an accreditation application. 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 site visit team meals during the day, and for arranging and funding any transportation to affiliated hospitals and regional campuses.

Records for COCA Decision Making

Comprehensive Reviews With Self-Study

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

- Self-study report and supplemental documents submitted by the COM;
- Student survey;
- Additional needed information identified by the staff or site visit team;
- Site visit report submitted by the Site Visit Team Chair;
- Historical accreditation decisions and longitudinal tracking of non-compliant standards

- and elements;
- Factual corrections and supporting documents submitted by the COM;
 - Third-party comment;
 - COCA commissioner review (completed by two reviewers); and
 - COCA staff review.

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

Progress Reports and Compliance Monitoring

A COM must submit its progress report at least sixty (60) days before the COCA meeting at which the COCA will review it.

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

- Progress report and supplemental documents submitted by the COM;
- Historical accreditation decisions and longitudinal tracking of non-compliant standards and elements;
- COCA commissioner review; and
- COCA staff review.

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

Requests for Substantive Change

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

- Self-study report and supplemental documents submitted by the COM;
- Site visit report, if applicable, submitted by the Site Visit Team Chair;
- Factual corrections and supporting documents submitted by the COM;
- Third-party comment;
- COCA commissioner review (completed by two reviewers); and
- COCA staff review.

All commissioners will receive all the above documents for decision making regarding a COM's

accreditation status. The COCA will not accept any additional information, 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 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.

The COM's Chief Executive Officer or Chief Academic Officer may file a request for reconsideration within seven (7) business days of receiving 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 accreditation standards or established policies and procedures;

To request a reconsideration, email the request and any documentation, including the reason for reconsideration and specific alleged issues, to the COCA Secretary at predoc@osteopathic.org. While a reconsideration action may not include new information, materials that were initially submitted and believed to have been improperly considered may be emphasized in the reconsideration request.

Reconsideration Review

The COCA EC will review the reconsideration request within seven (7) business days of its receipt. This will be a review of the submitted documents, including the request for reconsideration. There will be no verbal testimony from the COM during the reconsideration review.

COCA Reconsideration Decision

Following a reconsideration review, the COCA will decide to either:

- Maintain the COCA's original action; or
- Modify the COCA's original action.

The COCA, through its Secretary, will issue a final decision in writing to the COM within seven (7) business days of the reconsideration request's review.

Appeal of a COCA Accreditation Decision

The Chief Executive Officer or Chief Academic Officer of a COM may appeal a COCA decision within fourteen (14) business days of receiving the COCA's final action regarding a reconsideration request. A COM may not file an appeal unless it has first requested the reconsideration of a COCA action. The COM's existing 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 factual error of sufficient magnitude to warrant a change in the COCA's action; or
- Significant departure from the accreditation standards 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 COCA's decision was in error and that it is not supported by substantial evidence.

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

To appeal a reconsideration request, email the appeal and any documentation, including the reason for the appeal and specific alleged issues, to the COCA secretary at predoc@osteopathic.org. While an appeal action will not include new information, materials that were initially submitted and believed to have been improperly considered may be emphasized in the appeal. If an 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 COCA will annually review and approve the list of former COCA members eligible for participation in the COCA Appeal Panel. The COCA Appeal Panel is subject to the COCA's Conflict of Interest Policy.

COCA Appeal Panel Hearing

Unless the COM agrees to a different timeline, the COCA Appeal Panel will convene an appeal hearing within forty-five (45) business days after receiving the appeal. The COM will be notified once the hearing date is established. The COCA Appeal Panel will consider 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:

- Self-study report and supplemental documents submitted by the COM;
- Site visit report submitted by the Site Visit Team Chair;
- Historical accreditation decisions and longitudinal tracking of non-compliant standards and elements;
- Factual corrections and supporting documents submitted by the COM;
- Third-party comment;
- COCA Final Action Letter;
- Reconsideration request;
- Final Reconsideration Action Letter; and
- Request for appeal.

A quorum (simple majority) of the COCA 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 COCA Appeal Panel Chair shall serve as the presiding member of the COCA Appeal Panel. The duties of the Presiding Member are:

1. Make the opening statement for the COCA 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 fourteen (14) business days prior to the appeal hearing.

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

COCA Appeal Panel Decisions

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

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

The COCA Appeal Panel may take one of the following actions:

- Affirm the COCA's original action;
- Reverse the COCA's original action; 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 accreditation standards and procedures.

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

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

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 information concerning specific actions and programs that may be in non-compliance with the COCA's accreditation standards to the COCA's attention. 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 its responsibility to be a mechanism for reviewing and finally resolving complaints against the COCA or the administrative staff.

Complaints must be submitted within two years of the alleged incident that is the basis of the complaint.

The COCA does not mediate on behalf of a complainant or otherwise intervene in decisions made by an accredited program.

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 academically or professionally affected by the accreditation program; or
- A member of the 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. Complaints unsigned by the complainant(s) or

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. Names of all individuals identified in the complaint will be redacted.

A complaint must present a concern regarding one or more violations of accreditation standards or procedures and must be based on direct and responsible information. A citation to the relevant standard or procedure must be included as well. The complainant must provide a narrative of their allegation as it relates to the accreditation standards or procedures and include any documentation that could support their 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 COM administration, which is the recommended route, and must include information about all other actions taken to resolve the problems before filing the complaint 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. The above-referenced time frames may be extended by the COCA Secretary when circumstances warrant.

Response to Complaints

The decision of the COCA Executive Committee or *ad hoc* subcommittee will be communicated to the complainant and the COM in writing. The complainant will not be informed of the result of any such investigation. This process will be concluded within 15 days.

Further 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 mode of investigation is most appropriate for the complaint, which may include a written progress report, on-site visit, or any investigation deemed appropriate.

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, based on an investigation, the COCA has determined that the COM fails to meet the accreditation standards.

If the COM has been found to be out of compliance with any accreditation standard, the COCA may require 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;
- A progress report documenting the COM's planning and its implementation of the plans; or
- An on-site visit 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 Policies and 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.

The COCA Secretary, in conjunction with AOA General Counsel, will present the complaint to the COCA Chair, Vice-Chair, and, when applicable, affected staff members. A subcommittee of the COCA will be appointed by the COCA Chair to formally review the complaint and develop a response. This subcommittee review process and response will be completed and forwarded to the COCA within thirty (30) days of the date that 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 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's decision.

Request for Substantive Change

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

Teach-Out Plans and Agreements

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 status must submit a written teach-out plan to the COCA within ninety (90) days of receiving an Accreditation With Probation status decision. The plan must specify what additional charges, if any, the students will need to pay and must further specify notifying the students of those charges. The plan must also contain a signed agreement with one or more COMs that agree 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 status should not be denied or withdrawn. The COCA will state in writing its reasons for taking this action. The COM will have up to thirty (30) days to respond. The COCA will take action upon the COM's response within thirty (30) days after its receipt.

Escrowed Teach-Out Reserve Fund

A proposed COM seeking Candidate status must demonstrate compliance with Candidate Element 3.3: Escrow Reserve Funds. The escrowed funds must be held until Accreditation status is achieved and upon graduation of the first class of students. Escrowed funds will be used to implement a teach-out plan if the program closes before the COM achieves Accreditation status.

Conditions That Require Approval of a Teach-Out Plan

The COCA requires a COM that has been granted Pre-Accreditation or Accreditation status to submit a teach-out plan to the COCA for approval in case any of the following events occurs:

- 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 has initiated 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 status 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 based on the criteria listed below for teach-out agreements. The plan must specify what additional charges, if any, students will need to pay 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 that has been granted Pre-

Accreditation status or Accreditation status 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:

- The COM submits the agreement to the COCA for its review and approval at least 120 days prior to beginning the transfer of students under the agreement;
- The agreement is consistent with the accreditation standards and procedures;
- The agreement provides that students will receive all the instruction promised by the closed institution that is not being provided because of the closure;
- The COCA reviews 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 must 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;
- The recipient teach-out institution demonstrates that it has the necessary experience, resources, and support services to provide an educational program of acceptable quality that is reasonably similar in its content, structure, and scheduling to that of the institution ceasing operations either entirely or at one of its locations;
- The recipient teach-out institution demonstrates that it will remain stable, carry out its mission, and meet all obligations to its existing students during the period of the teach-out agreement;
- The closed institution will strive to place students in geographic proximity to the closed institution; and
- The recipient institution COM(s) request an increase in class size through the substantive change process to take additional students from the closed institution.

Closed Institutions Without a Teach-Out Plan or Agreement

If a COM with 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 agencies, to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charges.

Operating Reserve Fund

A proposed COM seeking Candidate status must demonstrate compliance with Candidate Element 3.4: Operating Reserve Fund. The reserve funds must be held until Accreditation status is achieved and until the first class of students graduates. The COCA may authorize use of this fund for operations, equipment, or construction costs. If the COCA grants such use, then the minimum value of this fund must be re-attained at the end of the fiscal year in which the operating reserve fund is reduced below its required minimum value.

Requirements of the United States Department of Education (USDE)

Activities by the COCA

The COCA will submit the following to the USDE:

- 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 accredited by the COCA 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
- Information that may affect a pre-accredited 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 if requested by the Secretary.

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 on 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 agencies, the appropriate accrediting agencies, and the public at the same time as the decisions are provided to the COM, and within thirty (30) days after making either of the following decisions:

- Final decision of warning, probation, or equivalent status of an institution or program; or
- Final decision to deny, withdraw, suspend, revoke, or terminate Candidate status, Pre-Accreditation status, or Accreditation status of an institution or program.

A brief statement summarizing the reasons for the COCA'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 agencies, the appropriate accrediting agencies, and the public no later than thirty (30) days after making the final decision.

Annual Information

The COCA will make the following available to the USDE on an annual basis:

- A copy of the COCA's annual report to the AOA House of Delegates; and
- An updated copy of the directory of COMs with 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 accredit programs offered solely by distance education. The COCA accredits osteopathic medical schools and 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 online 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 solely by distance education as defined at 34 CFR §602.3.

Non-Compliance

COMs must promptly correct non-compliance with any accreditation standard. The regulations of the USDE requires the COCA to ensure that each area of non-compliance cited in a letter of accreditation has been brought into compliance within two (2) years after issuing the citation. If the COCA determines that a program is non-compliant with any standard or element, the USDE requires the COCA to:

- Make the program take appropriate action and bring itself into compliance with the standard within two (2) 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 a program's accreditation. 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 (2) years constitutes grounds for accreditation denial or withdrawal unless the period for achieving compliance is extended, at the COCA's discretion, 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 resolving its non-compliance issues (e.g., 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 achieve compliance within the period of extension (e.g., 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 or fundraising for scholarships, reasonably requires a period exceeding twenty-four (24) months; or
- The COM has provided documentation of the need for actions by groups external to the medical education program, such as decisions requiring 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 twelve (12) months beyond the standard two-year period to achieve compliance. In its communication with a COM, the COCA will specify the reason(s) for granting an extension for good cause and the period within which the medical education program must achieve 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 recognition criteria by the Secretary of Education.

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 an institutional accrediting agency has made a decision to: (a) deny an institution's accreditation, pre-accreditation, or charter to operate; or (b) suspend, revoke, withdraw, or terminate an 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 an institutional accrediting agency or state chartering authority. In the event of a probation decision, the COCA will determine whether to grant or continue accreditation based on a review determining if the areas cited as the reasons for the

probation action by the institutional accreditation agency or state chartering authority represent non-compliance with one or more COCA accreditation standards.

If the COCA decides to grant or continue accreditation, it will provide a thorough and reasonable explanation, consistent with its standards, to the Secretary of Education within thirty (30) days of its action. This explanation will detail 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 the 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 of the USDE at 34 CFR §602, 34 CFR §667, 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 agencies, the appropriate accrediting agencies, and the public within thirty (30) days of decisions to:

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

Withdrawal or Lapses of Accreditation

The COCA will notify the Secretary of the Education, the appropriate state licensing or authorizing agencies, the appropriate accrediting agencies, and, upon request, the public within thirty (30) days of receiving the institution's or program's decision to withdraw voluntarily from Candidate status, Pre-Accreditation status, or Accreditation status. The COCA will notify the Secretary of the USDE, the appropriate state licensing or authorizing agencies, the appropriate accrediting agencies, and, upon request, the public within thirty (30) days of the date on which Accreditation status or Pre-Accreditation status lapses if the institution or program notifies the COCA that it will not request renewal of its Pre-Accreditation or Accreditation status.