Accreditation of Colleges of Osteopathic Medicine:
COCA Substantive Change Policies and Procedures
Effective for reviews submitted on or after July 1, 2017
Table of Contents

General Information ............................................................................................................................................. 3
Substantive Changes Requiring Comprehensive Evaluation .................................................................................. 4
Substantive Change Decisions ............................................................................................................................. 5
  Change in Educational Mission or Objectives of the Institution ........................................................................... 5
  Change in the Location of the Institution ........................................................................................................... 6
  Change in Legal Status or Form of Control or Ownership of the Institution ......................................................... 7
  Change in Curriculum/Change in Curriculum Length .......................................................................................... 8
  Change in Hour Calculations ............................................................................................................................ 9
  Additional Location ........................................................................................................................................... 10
  Branch Campus .................................................................................................................................................. 12
  Transition .......................................................................................................................................................... 13
  Contracting with a non-Title IV Eligible Institution for 25% to 49% of a Program ............................................ 14
  Acquisition of any other Institution or any Program or Location of another Institution .................................... 15
  Addition of a Permanent Location at which a Teach-out is being conducted for students of another institution that has ceased operations ..................................................................................... 16
  Planned Increase in Class Size ......................................................................................................................... 17
  Unplanned Increase in Class Size .................................................................................................................... 18
  Addition of a Program of Study at a Degree or Credential Level ..................................................................... 19

APPENDIX

  Substantive Change Self Study Documents .................................................................................................... 20
General Information

The COCA will maintain complete and accurate records of all decisions made regarding requests for substantive changes, including the correspondence that is significantly related to those decisions. The COCA will not grant “pre-approval” of Additional Locations or Branch Campuses as described in 34 CFR 602. If a COM wishes to implement a Substantive Change, the COM must receive prior approval from the COCA at least 120 days before the implementation of the Substantive Change, or as described under each change. The COCA will approve a Substantive Change when the criteria for the requested change have been met and the COCA determines that the change will not adversely affect the capacity of the COM to meet the Continuing Accreditation Standards. The COCA will not review a Substantive Change for a New and Developing COM until at least one year after graduation of the first class of students.

Substantive Changes that the COCA will review are:

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

Queries about whether a proposed change qualifies as a Substantive Change or initial requests for a Substantive Change should be submitted via the Substantive Change Request Form to:

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

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

1. Had its last Comprehensive Accreditation visit four (4) or more years ago;
2. Has received an accreditation status that included “with warning” or “with probation” within the last (5) years;
3. Had an approved Substantive Change-Class Size Increase within five (5) years;
4. Had an approved Substantive Change-Unplanned Class Size Increase within five (5) years;
5. Had an approved Substantive Change-Branch Campus within five (5) years; and
6. Had an approved Substantive Change-Additional Location within five (5) years.

The COCA may grant a new cycle of review of continuing Accreditation to a COM which undergoes a Comprehensive on-site visit for purposes of evaluating a request for Substantive Change.
Substantive Change Decisions

Change in Educational Mission or Objectives of the Institution

Definition:

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

Timing:

Application should occur at least 60 days prior to the COCA Meeting where the Substantive Change Request will be addressed.

Application:

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

1. The rationale for the change;
2. The effect this change will have on learning outcome assessments, facilities, faculty, admission policies and procedures, and the curriculum;
3. Governing body review and approval; and
4. Announcement of the proposed change to students, faculty, staff, alumni, and the public.

A COM requesting a change in education mission or objectives must submit a non-refundable application fee.

Monitoring:

Monitoring will occur as part of the routine annual reporting to the COCA
Change in the Location of the Institution

Definition:

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

Timing:

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

Application:

A request for a change in an institution’s location must provide documentation that describes:

1. Appropriate charters, licenses, or approvals required to function if location is moved to a new jurisdiction;
2. The new facilities including a building and/or remodeling plans, project budget, and completion timelines;
3. Budget for move and other related expenses;
4. Impact on the recruitment plan;
5. Impact on the currently enrolled students;
6. Impact on the existing faculty;
7. Impact on the clinical education program; and
8. Governing body discussion and approval.

A COM requesting a change in the location of the institution must submit a non-refundable application fee.

Site Visit:

A site visit to the new location will occur prior to the review of the substantive change request by the COCA.

Monitoring:

Monitoring will occur as part of the routine annual reporting to the COCA.
Change in Legal Status or Form of Control or Ownership of the Institution

Definition:

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

Timing:

Application should occur at least 60 days prior to the COCA Meeting where the Substantive Change Request will be addressed.

Application:

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

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

A COM requesting a change in legal status or form of control of ownership of the institution must submit a non-refundable application fee.

Monitoring:

The COCA will conduct a site visit to an institution that has undergone a change of control as soon as practicable, but no later than six months after the change of ownership. Additional monitoring will occur as part of the routine annual reporting to the COCA.
Change in Curriculum/ Change in Curriculum Length

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

Timing:
Application should occur in the calendar year prior to the desired change and at least 60 days prior to the COCA Meeting where the substantive change will be addressed.

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

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

A COM requesting a change in curriculum must submit a non-refundable application fee.

Monitoring:
All monitoring will occur as part of the routine annual reporting to the COCA.
Change in Hour Calculations

Definition:

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

Timing:

Application should occur at least 60 days prior to the COCA Meeting where the Substantive Change Request will be addressed.

Application:

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

A COM requesting to change clock hours to credit hours or vice versa must submit a non-refundable application fee.

Monitoring:

All monitoring will occur as part of the routine annual reporting to the COCA.
Additional Location

Definition:

An Additional Location is geographically apart from the main campus, and offers at least 50 percent of an educational program. The Additional Location will not have separate administration, faculty, or budgetary independence. The additional location must have a common Chief Academic Officer, faculty, budget, and curriculum with the parent COM. Students may be admitted directly to the Additional Location as their primary place of enrollment.

The accreditation for an additional location is under the parent COM and is extended to the additional location following review of documents and completion of a site visit prior to the time permission to enroll students is granted. Reporting to the COCA will occur as a combined cohort for all sites as a singular COM. Each cohort should include the students in that graduating year across all sites.

The COCA may serve as the programmatic or institutional accreditor for COMs wishing to request an Additional Location. The COCA conducts ongoing site visits at Additional Locations at reasonable intervals.

An additional location request will be assumed to include request for a class size increase, unless specifically noted that students will be re-located from an existing campus.

Timing:

Application should occur at least 24 months prior to planned matriculation of the first class of students at the additional location and at least 120 days prior to the COCA meeting where the substantive change will be addressed.

Application: The application for an additional location will include the following:

1. Feasibility Study (Business Plan) that is completed by an external business consulting group (Please see the glossary for full definition of what must be included within the Feasibility Study)
2. Additional Location Substantive Change Self-Study
3. Approval from the Institutional Accreditors and all State Licenses to Operate/ Offer the Degree at the Additional Location site.
4. Submit a non-refundable Application Fee
5. Site Visit: A Pre-Operations Site Visit will be completed to assess the adequacy of the application (before application is brought to COCA). A COM cannot recruit students or begin operations, including offering instruction, at an Additional Location until the COCA has conducted the first on-site visit and approved the Additional Location.
Monitoring:

1. Year 1 Focused Site Visit, within six months after establishment of the Additional Location, to assess the Facilities, Faculty, Student Services, Finances, and Administrative Capacity to operate the Additional Location.
2. Year 2 Progress Report to assess the readiness for clinical education
3. Other monitoring will occur as part of the routine annual reporting to the COCA
Branch Campus

Definition:

A branch campus is a location that is geographically apart from the COM and is:

1. Permanent in nature;
2. Offers courses in educational programs leading to a DO degree;
3. Has its own faculty and administrative or supervisory organization; and
4. Has its own budgetary and hiring authority.

The accreditation for a branch campus is under the parent COM and is granted at the time permission to enroll students is granted. Reporting to the COCA will occur as separate campuses.

The COCA may serve as the programmatic or institutional accreditor for COMs wishing to request a Branch Campus. The COCA conducts ongoing site visits at Branch Campuses at reasonable intervals.

Timing:

Application should occur at least 24 months prior to planned matriculation of the first class of students at the additional location and at least 120 days prior to the COCA meeting where the substantive change will be addressed.

Application: The application for a branch campus will include the following:

1. Feasibility Study (Business Plan) that is completed by an external business consulting group (Please see the glossary for full definition of what must be included within the Feasibility Study)
2. Branch Campus Substantive Change Self-Study
3. Approval from the Institutional Accreditor and all State Licenses to Operate/Offer the Degree at the Branch Campus
4. Submit a non-refundable Application Fee
5. Site Visit: A Pre-Operations Site Visit will be completed to assess the adequacy of the application (before application brought to COCA). Approval from the Institutional Accreditor, if other than the COCA, must be obtained prior to granting of approval to operate, including recruiting of students, at the Branch Campus.
6. Escrow Fund: To ensure adequate funding, a proposed Branch Campus must place both an Escrowed Reserve Fund and an Operating Reserve Fund as described in the Accreditation Standards for New and Developing COMs and the Glossary. These funds will be released upon graduation of the first class of students from the Branch Campus.
Monitoring:

1. Year 1 Focused Site Visit, within six months after establishment of the Branch Campus to assess the Facilities, Faculty, Student Services, Finances, and Administrative Capacity to operate the Branch Campus.
2. Year 2 Progress Report to assess the readiness for clinical education
3. Other monitoring will occur as part of the routine annual reporting to the COCA

Transition

Transition Period for current Additional Locations and Branch Campuses approved before July 1, 2017

Current Additional Locations

The Additional Location will have until January 1, 2019 to demonstrate compliance with the additional location definition or to transition to an independent college of osteopathic medicine. If wishing to transition, see Transition Policy.

Current Branch Campuses

The Branch Campus will have until January 1, 2019 to demonstrate compliance with the branch campus definition, elect to become an additional location, or to transition to an independent college of osteopathic medicine. If wishing to transition to an Independent COM, see Transition Policy.

Transition Policy

The Additional Location or Branch Campus wishing to transition to an independent COM must:

1. Submit a non-refundable Application Fee
2. Complete a Comprehensive Self-Study
3. Complete a Third-Party Business Plan (for current Additional Locations only)
4. Undergo a site visit
5. Provide an Operating Reserve Escrow Fund (see Glossary for definition) as described in the New & Developing COM Standards
6. Obtain a USDE Recognized Regional or Institutional Accréditor

The COM in transition will be granted a Pre-Accreditation status not to exceed 5 years. The COM will undergo a Comprehensive Evaluation in Year 4 of independence. If all standards are met at that time, Full Accreditation may be granted with release of the Escrow Account. If any standards are unmet, the COM will be monitored (via progress reports and focused visits, if deemed necessary by the commission) until all standards are met. At the time all standards are met, the COM will be granted accreditation with release of the Escrow Account.
Contracting with a non-Title IV Eligible Institution for 25% to 49% of a Program

Definition:

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

Timing: As per substantive change requested.

Application and Monitoring:

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

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

The COCA does not approve contracts with non-Title IV eligible institutions for 50% or more of a COM's educational program.
Acquisition of any other Institution or any Program or Location of another Institution

Definition:

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

Timing: As per substantive change requested.

Application and Monitoring:

The criteria for evaluation and monitoring are those as established for Substantive Change–Governance and Substantive Change–Additional Location/Substantive Change–Branch Campus depending on the COCA’s accreditation role and the nature of the agreement.

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

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

If two COMs intend to merge in a manner that one of the COMs remains the surviving entity, and has programmatic accreditation from the COCA, then this will be reviewed as a Substantive Change–Additional Location.
Addition of a Permanent Location at which a Teach-out is being conducted for students of another institution that has ceased operations

Definition:

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

Timing: As per substantive change requested.

Application and Monitoring:

The criteria for evaluation and monitoring are those as established for Substantive Change–Governance and Substantive Change–Additional Location/Substantive Change–Branch Campus depending on the COCA’s accreditation role and the nature of the agreement.

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

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

Definition:

All COMs have an approved class size from the COCA. Each Branch Campus and Additional Location that is recognized by the COCA will also have a separate, approved class size from the COCA. A COM requesting to accept additional first-time matriculants beyond the approved class size must submit a substantive change request for an increase in class size.

For an accurate accounting of class size, in those instances where a student matriculates in one (1) year but takes a leave of absence or other decelerated program options, the COM will count that student towards the class in which he/she matriculated.

Timing:

Application should occur in the calendar year prior to the desired change and at least 60 days prior to the COCA Meeting where the substantive change will be addressed.

Application:

Documentation to be submitted by the COM for this review must include, but is not limited to:

1. Discussion of adequacy of faculty and how that was calculated;
2. Discussion of sufficient classroom and laboratory space, such as auditoriums, anatomy, and Osteopathic Manipulative Medicine labs
3. Discussion of sufficient student space including study space
4. Discussion of sufficient learning resources
5. An Operating pro forma for five years after the planned increase in class size
6. Evidence of sufficient numbers of Year 3 and Year 4 clinical education positions;
7. Evidence of sufficient GME positions

This submission will be completed via the COCA Online Class Size Increase Self Study.

Monitoring:

1. Year 1 Focused Site Visit to assess the Facilities, Faculty, Student Services, and Finances
2. Year 2 Progress Report to assess the readiness for clinical education
3. A COCA Accreditation Student Survey will be completed as part of the Year 2 Reporting
4. Other monitoring will occur as part of the routine annual reporting to the COCA
Unplanned Increase in Class Size

Definition:

All COMs with an entering first-time matriculants in excess of the approved class size plus the permitted variance of eight percent (8%) will be determined to have an unplanned class size increase. Class Size for all classes at the COM will be assessed annually by the COCA. Failure to submit the requested class size data by the submission deadline will result in the assessment of an unplanned class size increase and may result in an adverse accreditation action.

For the purpose of an accurate accounting of class size, in those instances where a student matriculates in one (1) year but takes a leave of absence or other decelerated program options, the COM will count that student towards the class in which he/she matriculated.

Timing: Not applicable

Application: Not applicable

Monitoring:

1. Year 1 Focused Site Visit to assess the Facilities, Faculty, Student Services, and Finances
2. Year 2 Progress Report to assess the readiness for clinical education
3. A COCA Accreditation Student Survey will be completed as part of the Year 2 Reporting
4. Other monitoring will occur as part of the routine annual reporting to the COCA

Other actions that may be taken by the COCA:

Any COM with a first-time matriculation in excess of the allowed eight percent (8%) variance over their approved class size will not be allowed to request a class size increase for four (4) years in order to permit the COCA to follow the academic achievement of this class cohort throughout its remaining years to receipt of the first professional degree.

The COCA will have the right to review the accreditation status of any institution which exceeds its class size using progressive measures as follows:

1. A request for additional written information to explain the deficiency;
2. A request to show cause as to why a COM is not out of compliance;
3. A focused visitation as directed;
4. A reduction in approved class size as directed by the COCA.
Addition of a Program of Study at a Degree or Credential Level

The COCA has limited authority for institutional accreditation. It is only recognized by the U.S. Department of Education as an institutional accreditor for freestanding COMs that offer only the DO degree and does not institutionally accredit other institutions. As a result, a COM that is institutionally accredited by the COCA must first become institutionally accredited by a different institutional accreditor before it can offer any other program of study.

A COM that is considering offering any other program of study – including programs that represent a significant departure from the existing offerings or educational programs, or method of delivery - must inform the COCA and submit documentation demonstrating that the COM has a new institutional accreditor prior to the start of the additional program of study so that the COCA can ensure that the institutional accreditation requirement continues to be met.

Where institutional accreditation is provided by another accreditor, the COCA serves only as the programmatic accreditor to the COM, and in its role as a programmatic accreditor does not view the addition of another program of study by the institution to constitute by itself a substantive change requiring COCA review and approval.
APPENDIX

SUBSTANTIVE CHANGE SELF STUDY DOCUMENTS

Additional Location

An Additional Location is geographically apart from the main campus, and offers at least 50 percent of an educational program. The Additional Location will not have separate administration, faculty, or budgetary independence. The additional location must have a common Chief Academic Officer, faculty, budget, and curriculum with the parent COM. Students may be admitted directly to the Additional Location as their primary place of enrollment.

The accreditation for an additional location is under the parent COM and is extended to the additional location following review of documents and completion of a site visit prior to the time permission to enroll students is granted. Reporting to the COCA will occur as a combined cohort for all sites as a singular COM. Each cohort should include the students in that graduating year across all sites.

Application/ Self Study

1. Feasibility Study (Business Plan) that is completed by an external business consulting group
2. Approval from the Institutional Accréditr and all State Licenses to Operate/ Offer the Degree at the Additional Location site.
3. Submit a non-refundable Application Fee

The Self Study should address the following:

1. Cover Letter with campus name, campus location, class size requested, and anticipated start date.
2. Introduction to the COM – include history and mission
3. Need for a campus in this location – include healthcare needs in the region
4. Discuss Compliance with the Following Standards:
   a. Candidate Element 1.2: Licensing and Regional/ Institutional Accreditation
   b. Candidate Element 2.3: Academic and Administrative Leadership
   c. Candidate Element 3.1: Financial Resources (include both operating budget and capital budget discussion)
   d. Candidate Element 3.2: Feasibility Study (Business Plan)
   e. Candidate Element 4.1: Facilities
   f. Candidate Element 4.2: Information Technology
   g. Candidate Element 6.5: Clinical Affiliation Agreements
   h. Candidate Element 7.1: Faculty and Staff Resources and Qualifications
   i. Candidate Element 9.2: Recruitment of Students
   j. Pre-Accreditation Element 3.4: Financial Audit
   k. Pre-Accreditation Element 9.5: Academic Counseling
1. Pre-Accreditation Element 9.6: Career Counseling  
m. Pre-Accreditation Element 9.7: Financial Aid and Debt Management Counseling  
n. Pre-Accreditation Element 9.8: Mental Health Services  
o. Pre-Accreditation Element 9.9: Physical Health Services  
p. Pre-Accreditation Element 10.1: GME Development  

Any Standards/ Elements not specifically addressed are expected to be the same as those on the parent campus.  

Monitoring:  

5. Year 1 Focused Site Visit, within six months after establishment of the Additional Location, to assess the Facilities, Faculty, Student Services, Finances, and Administrative Capacity to operate the Additional Location  

a. Continuing Accreditation Elements That Will Be Addressed  
   i. Element 3.1: Financial Resources  
   ii. Element 4.1: Facilities  
   iii. Element 6.9: Clinical Education  
   iv. Element 7.1: Faculty and Staff Resources and Qualifications  
   v. Element 9.5: Academic Counseling  
   vi. Element 9.6: Career Counseling  
   vii. Element 9.7: Financial Aid and Debt Management Counseling  
   viii. Element 9.8: Mental Health Services  
   ix. Element 9.9: Physical Health Services  

6. Year 2 Progress Report to assess the readiness for clinical education  

a. Continuing Accreditation Elements That Will Be Addressed:  
   i. Element 4.1: Facilities  
   ii. Element 5.4: Patient Care Supervision  
   iii. Element 6.9: Clinical Education  
   iv. Element 6.10: Clinical Experience  
   v. Element 7.1: Faculty and Staff Resources and Qualifications  

Branch Campus  

A branch campus is a location that is geographically apart from the COM and is:  

1. Permanent in nature;  
2. Offers courses in educational programs leading to a DO degree;  
3. Has its own faculty and administrative or supervisory organization; and  
4. Has its own budgetary and hiring authority.
The accreditation for a branch campus is under the parent COM and is granted at the time permission to enroll students is granted. Reporting to the COCA will occur as separate campuses.

The COCA may serve as the programmatic or institutional accreditor for COMs wishing to request a Branch Campus.

Application/ Self Study

1. Feasibility Study (Business Plan) that is completed by an external business consulting group
2. Approval from the Institutional Accr... the Degree at the Branch Campus
3. Submit a non-refundable Application Fee

The Self Study should address the following:

1. Cover Letter with campus name, campus location, class size requested, and anticipated start date.
2. Introduction to the COM – include history and mission
3. Need for a campus in this location – include healthcare needs in the region
4. Rationale for a Branch Campus versus Additional Location
5. Discuss Compliance with the Following Standards:
   a. Candidate Element 1.2: Licensing and Regional/ Institutional Accreditation
   b. Candidate Element 2.1: Dean Qualifications
   c. Candidate Element 2.2: Full Time Dean
   d. Candidate Element 2.3: Academic and Administrative Leadership
   e. Candidate Element 3.1: Financial Resources (include both operating budget and capital budget discussion)
   f. Candidate Element 3.2: Feasibility Study (Business Plan)
   g. Candidate Element 3.3: Escrowed Reserve Funds
   h. Candidate Element 3.4: Operating Reserve Fund
   i. Candidate Element 4.1: Facilities
   j. Candidate Element 4.2: Information Technology
   k. Candidate Element 6.5: Clinical Affiliation Agreements
   l. Candidate Element 7.1: Faculty and Staff Resources and Qualifications
   m. Candidate Element 9.2: Recruitment of Students
   n. Pre-Accreditation Element 3.3: Budgetary Authority
   o. Pre-Accreditation Element 3.4: Financial Audit
   p. Pre-Accreditation Element 4.2: Security and Public Safety
   q. Pre-Accreditation Element 4.4: Learning Resources
   r. Pre-Accreditation Element 6.1: Curriculum Design and Management
   s. Pre-Accreditation Element 6.2: Programmatic Level Educational Objectives
   t. Pre-Accreditation Element 6.5: Scientific Method
   u. Pre-Accreditation Element 6.6: Principles of Osteopathic Medicine
   v. Pre-Accreditation Element 6.7: Self-Directed Learning
w. Pre-Accreditation Element 6.8: Interprofessional Education for Collaborative Practice
x. Pre-Accreditation Element 6.9: Clinical Education
y. Pre-Accreditation Element 6.10: Clinical Experience
z. Pre-Accreditation Element 6.11: Comparability across Clinical Education Sites
aa. Pre-Accreditation Element 7.3: Department Chair Qualifications
bb. Pre-Accreditation Element 7.4: Primary Care Leadership
c. Pre-Accreditation Element 7.5: OMM/OPP Leadership
dd. Pre-Accreditation Element 7.6: Faculty Development
ee. Pre-Accreditation Element 7.7: Faculty Association
ff. Pre-Accreditation Element 9.5: Academic Counseling
gg. Pre-Accreditation Element 9.6: Career Counseling
hh. Pre-Accreditation Element 9.7: Financial Aid and Debt Management Counseling
ii. Pre-Accreditation Element 9.8: Mental Health Services
jj. Pre-Accreditation Element 9.9: Physical Health Services
kk. Pre-Accreditation Element 10.1: GME Development
ll. Pre-Accreditation Element 11.1: Program Assessment

Any Standards/Elements not specifically addressed are expected to be the same as those on the parent campus.

Monitoring:

1. Year 1 Focused Site Visit, within six months after establishment of the Branch Campus, to assess the Facilities, Faculty, Student Services, Finances, Curriculum, and Administrative Capacity to operate the Branch Campus.
   a. Continuing Accreditation Elements That Will Be Assessed: ALL

2. Year 2 Progress Report to assess the readiness for clinical education
   a. Continuing Accreditation Elements That Will Be Addressed:
      i. Element 4.1: Facilities
      ii. Element 5.4: Patient Care Supervision
      iii. Element 6.9: Clinical Education
      iv. Element 6.10: Clinical Experience
      v. Element 7.1: Faculty and Staff Resources and Qualifications

**Change in Legal Status or Form of Control**

Monitoring Visit Elements That Will Be Assessed:

1. Element 1.2: Strategic Plan
2. Element 1.3: Licensing and Regional/Institutional Accreditation
3. Element 1.4: Governance & Program Policies
4. Element 1.5a: Non-Discrimination
5. Element 1.5b: Non-Discrimination for Faith Based Institutions  
6. Element 1.6: Degree Granting Body  
7. Element 3.1: Financial Resources  
8. Element 3.2: Financial Planning and Budgeting  
9. Element 7.7: Faculty Association  

**Planned Class Size Increase**  
The Self Study should address the following:  
1. Element 1.7: Clinical Education Affiliation Agreements  
2. Element 2.3: Academic and Administrative Leadership  
3. Element 3.1: Financial Resources  
4. Element 3.4: Financial Audit  
5. Standard 4: Facilities  
7. Element 6.1: Curriculum Design and Management  
8. Element 6.2: Programmatic Level Educational Objectives  
9. Element 6.4: Osteopathic Core Competencies  
10. Element 6.6: Principles of Osteopathic Medicine  
11. Element 6.8: Interprofessional Education for Collaborative Practice  
12. Element 6.9: Clinical Education  
13. Element 7.1: Faculty and Staff Resources and Qualifications  
14. Element 7.2: Faculty Approvals at All Teaching Sites  
15. Element 7.5: OMM/OPP Leadership  
16. Element 7.6: Faculty Development  
17. Element 7.8: Faculty Appointment and Advancement  
18. Element 9.1: Admissions Policy  
19. Element 9.5: Academic Counseling  
20. Element 9.6: Career Counseling  
21. Element 9.7: Financial Aid and Debt Management Counseling  
22. Element 9.8: Mental Health Services  
23. Element 9.9: Physical Health Services  
24. Standard 10: Graduate Medical Education  
25. Element 12.5: Title IV Responsibility  

Monitoring:  
1. Year 1 Focused Site Visit to assess the Facilities, Faculty, Student Services, and Finances  
   a. Continuing Accreditation Elements That Will Be Assessed:  
      i. Element 3.1: Financial Resources  
      ii. Element 4.1: Facilities  
      iii. Element 6.9: Clinical Education  
      iv. Element 7.1: Faculty and Staff Resources and Qualifications
v. Element 9.5: Academic Counseling
vi. Element 9.6: Career Counseling
vii. Element 9.7: Financial Aid and Debt Management Counseling
viii. Element 9.8: Mental Health Services
ix. Element 9.9: Physical Health Services

2. Year 2 Progress Report to assess the readiness for clinical education
   a. Continuing Accreditation Elements That Will Be Addressed:
      i. Element 4.1: Facilities
      ii. Element 5.4: Patient Care Supervision
      iii. Element 6.9: Clinical Education
      iv. Element 6.10: Clinical Experience
      v. Element 7.1: Faculty and Staff Resources and Qualifications
      vi. Element 11.4: Student Survey

3. A COCA Accreditation Student Survey will be completed as part of the Year 2 Reporting

Unplanned Class Size Increase

Monitoring:

1. Year 1 Focused Site Visit to assess the Facilities, Faculty, Student Services, and Finances
   a. Continuing Accreditation Elements That Will Be Assessed:
      i. Element 3.1: Financial Resources
      ii. Element 4.1: Facilities
      iii. Element 6.9: Clinical Education
      iv. Element 7.1: Faculty and Staff Resources and Qualifications
      v. Element 9.5: Academic Counseling
      vi. Element 9.6: Career Counseling
      vii. Element 9.7: Financial Aid and Debt Management Counseling
      viii. Element 9.8: Mental Health Services
      ix. Element 9.9: Physical Health Services

2. Year 2 Progress Report to assess the readiness for clinical education
   a. Continuing Accreditation Elements That Will Be Addressed:
      i. Element 4.1: Facilities
      ii. Element 5.4: Patient Care Supervision
      iii. Element 6.9: Clinical Education
      iv. Element 6.10: Clinical Experience
      v. Element 7.1: Faculty and Staff Resources and Qualifications
      vi. Element 11.4: Student Survey
3. A COCA Accreditation Student Survey will be completed as part of the Year 2 Reporting