



March 22, 2019

Brian Kim, JD
Vice President & Secretary, Commission on Osteopathic College Accreditation
American Osteopathic Association
142 E. Ontario
Chicago, IL 60611

Dear Mr. Kim:

The AOA Council on Undergraduate Medical Education (COUME) is responsible for reviewing and commenting on proposed college accreditation standards. On February 25, 2019, COUME met to review the draft college accreditation standards. The COUME was very supportive of the proposed changes and would like to share its recommendations with the Commission on Osteopathic College Accreditation (COCA).

Continuing Accreditation Standards Revision 2019

- **Element 2.1: Dean Qualifications-** COCA proposes the following qualifications for Deans.

3. Board certification at some time in his/her career; and

COUME proposes:

3. **AOA/ABMS** Board certification at some time in his/her career; and

- **Element 7.1: Faculty & Staff Resources & Qualifications,** COCA proposes the following qualifications for Faculty & Staff Resources & Qualifications.

At all educational teaching sites, including affiliated sites, a COM must have sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and board certification/board eligibility. In the event a COM is unable to fill physician faculty positions with board certified or board eligible physicians, the COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

COUME Proposes:

At all educational teaching sites, including affiliated sites, a COM must have sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and **AOA/ABMS** board certification/board eligibility. In the event a COM is unable to fill physician faculty positions with **AOA/ABMS** board certified or board eligible physicians, the COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not **AOA/ABMS** board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

- **Element 7.3: Department Chair Qualifications,** COCA proposes no revisions for Department Chair Qualifications.

COUME proposes:

A COM must employ Department Chairs, or their equivalent, with proven experience in teaching and academic leadership in a medical education setting. For clinical department chairs, the chair must have an active medical license and active **AOA/ABMS** board certification in the discipline in which they serve as chair.

Element 7.4: Primary Care Leadership, COCA proposes no revisions for Primary Care Leadership.

COUME proposes:

A COM must employ a Doctor of Osteopathic Medicine with an active medical license and active **AOA/ABMS** board certification from a primary care discipline to serve as the Department Chair of Primary Care (or equivalent). If the COM does not have an organized Department of Primary Care, the Department Chair of either Family Medicine or Internal Medicine or Pediatrics must be a Doctor of Osteopathic Medicine with active board certification.

Continuing Accreditation Evidentiary Submission 2019

- **Submission 2.1: Dean Qualifications,** COCA proposes the following qualifications for Deans.
 4. Provide a copy of the Dean's board certification documents.
- COUME proposes:
 4. Provide a copy of the Dean's **AOA/ABMS** board certification documents.
- **Submission 7.1: Faculty and Staff Resources and Qualifications,** COCA proposes no revisions for Faculty & Staff Resources & Qualifications.

COUME proposes:

 2. Submit a comprehensive statement explaining the circumstances why the COM has employed any physician faculty in the patient care environment who are not **AOA/ABMS** board certified or board eligible.
- **Submission 7.2: Faculty Approvals at All Teaching Sites,** COCA proposes the following qualifications for Faculty Approvals at All Teaching Sites.
 2. Submit a comprehensive and detailed statement explaining the circumstances why the COM employed any physician faculty in the patient care environment who are not board certified or board eligible.
 3. Complete Table 7.2. (in summary of tables)
Table includes:
Preceptor Name
Clinical Site
of Students per rotation supervised by the preceptor
Preceptor's status - Board cert? Board eligible
Preceptor's discipline
Preceptor appointed or approved as faculty?
(must define appointment vs. approval)

COUME proposes:

2. Submit a comprehensive and detailed statement explaining the circumstances why the COM employed any physician faculty in the patient care environment who are not **AOA/ABMS** board certified or board eligible.
3. Complete Table 7.2. (in summary of tables)
Table includes:
Preceptor Name
Clinical Site
of Students per rotation supervised by the preceptor
Preceptor's status - **AOA/ABMS** Board cert? Board eligible
Preceptor's discipline
Preceptor appointed or approved as faculty?
(must define appointment vs. approval)

- **Submission 7.3: Department Chair Qualifications**, COCA proposes the following qualifications for Department Chairs.

5. For each clinical department chair, provide a copy of the department chair's board certification documents.

COUME proposes:

5. For each clinical department chair, provide a copy of the department chair's **AOA/ABMS** board certification documents.

COM New & Developing Accreditation Standards 2019

- **Candidate Element 2.1: Dean Qualifications**, COCA proposes the following qualifications for Deans.

3. Board certification at some time in his/her career; and

COUME proposes:

3. **AOA/ABMS** Board certification at some time in his/her career; and

- **Candidate Element 2.3: Academic & Administrative Leadership**, COCA proposes no revisions proposed to the qualifications for Academic & Administration Leadership.

COUME proposes:

A proposed COM must have academic and administrative leadership to accomplish the mission of the medical school. Assistant/Associate Deans (at least one of which must be an **AOA/ABMS** board-certified DO) must have proven experience in teaching, educational design and evaluation, scholarly activity, and academic leadership in a medical education setting appropriate for the position.

- **Candidate Element 7.1: Faculty & Staff Resources & Qualifications**, COCA proposes the following qualifications for Faculty & Staff.

At all educational teaching sites, including affiliated sites, a proposed COM must demonstrate that it will have sufficient faculty and clinical staff resources to achieve the proposed program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and board certification/board eligibility. In the event a proposed COM is unable to fill physician faculty positions with board certified or board eligible physicians, the proposed COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

COUME proposes:

At all educational teaching sites, including affiliated sites, a proposed COM must demonstrate that it will have sufficient faculty and clinical staff resources to achieve the proposed program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and **AOA/ABMS** board certification/board eligibility. In the event a proposed COM is unable to fill physician faculty positions with an **AOA/ABMS** board certified or board eligible physicians, the proposed COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not **AOA/ABMS** board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

- **Pre-Accreditation Element 2.1: Dean Qualifications (CORE)**, COCA proposes the following revisions to Dean Qualifications.

3. Board certification at some time in his/her career; and

COUME proposes:

3. **AOA/ABMS** Board certification at some time in his/her career; and

- **Pre-Accreditation Element 7.1: Faculty & Staff Resources & Qualifications**, COCA proposes a and the following qualifications for Faculty & Staff Resources & Qualifications.

At all educational teaching sites, including affiliated sites, a pre-accredited COM must have sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and board certification/board eligibility. In the event a COM is unable to fill physician faculty positions with board certified or board eligible physicians, the COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

A candidate COM applying for pre-accreditation must have a pro forma plan for sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and board certification/board eligibility. In the event a COM is unable to fill physician faculty positions with board certified or board eligible physicians, the COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

COUME proposed:

At all educational teaching sites, including affiliated sites, a pre-accredited COM must have sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and **AOA/ABMS** board certification/board eligibility. In the event a COM is unable to fill physician faculty positions with **AOA/ABMS** board certified or board eligible physicians, the COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not **AOA/ABMS** board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

A candidate COM applying for pre-accreditation must have a pro forma plan for sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment, must hold current medical licensure and **AOA/ABMS** board certification/board eligibility. In the event a COM is unable to fill physician faculty positions with **AOA/ABMS** board certified or board eligible physicians, the COM may, under exceptional circumstances and upon good cause, employ physician faculty who are not **AOA/ABMS** board certified or board eligible based on that physician's demonstrated educational and clinical practice experience. All non-physician faculty must have demonstrated, appropriate qualifications in his/her disciplinary field.

- **Pre-Accreditation Element 7.4: Primary Care Leadership,** COCA proposes no revisions to the qualifications for Primary Care Leadership.

COUME proposes:

A COM must employ a Doctor of Osteopathic Medicine with an active medical license and active **AOA/ABMS** board certification from a primary care discipline to serve as the Department Chair of Primary Care (or equivalent). If the COM does not have an organized Department of Primary Care, the Department Chair of either Family Medicine or Internal Medicine or Pediatrics must be a Doctor of Osteopathic Medicine with active board certification.

Evidentiary Submission for New & Developing COMs 2019,

- **Candidate Submission 2.1: Dean Qualifications,** COCA proposes the following qualifications for Deans.

5. Provide a copy of the Dean's board certification documents.

COUME proposes:

5. Provide a copy of the Dean's **AOA/ABMS** board certification documents.

- **Candidate Submission 2.3: Academic and Administrative Leadership,** COCA proposes no revisions to the qualifications for Academic & Administrative Leadership.

COUME proposes:

- 5 Provide a copy of the employee's **AOA/ABMS** board certification documents (if a DO or MD).

- **Candidate Submission 7.1: Faculty and Staff Resources and Qualifications,** COCA proposes the following revisions to the qualifications for Faculty & Staff Resources and Qualifications.

2. Submit a comprehensive statement providing the justification for the proposed COM's anticipated employment of physician faculty (both FTE and adjunct) in the patient care environment who are not board certified or board eligible.

COUME proposes:

2. Submit a comprehensive statement providing the justification for the proposed COM's anticipated employment of physician faculty (both FTE and adjunct) in the patient care environment who are not **AOA/ABMS** board certified or board eligible.

- **Candidate Submission 7.2: Faculty Appointment and Advancement,** COCA proposes the following revisions to the qualifications for Faculty Appointment & Advancement

2. Submit a comprehensive and detailed statement explaining the circumstances why the COM employed any physician faculty in the patient care environment who are not board certified or board eligible.
3. Complete Table 7.2. (in summary of tables)

Table includes:
 Preceptor Name
 Clinical Site
 # of Students per rotation supervised by the preceptor
 Preceptor's status - Board cert? Board eligible
 Preceptor's discipline
 Preceptor appointed or approved as faculty?
 (must define appointment vs. approval)

COUME proposes:

- Submit a comprehensive and detailed statement explaining the circumstances why the COM employed any physician faculty in the patient care environment who are not **AOA/ABMS** board certified or board eligible.

- Complete Table 7.2. (in summary of tables)
- Table includes:
 Preceptor Name
 Clinical Site
 # of Students per rotation supervised by the preceptor
 Preceptor's status - **AOA/ABMS** Board cert? Board eligible
 Preceptor's discipline
 Preceptor appointed or approved as faculty?
 (must define appointment vs. approval)

- **Pre-Accreditation Submission 2.1: Dean Qualifications,** COCA proposes the following qualifications for Deans.

3. Provide a copy of the Dean's board certification documents.

COUME proposes:

- 3. Provide a copy of the Dean's **AOA/ABMS** board certification documents.
- **Pre-Accreditation Submission 7.1: Faculty and Staff Resources and Qualifications**, COCA proposes the following qualifications for Faculty and Staff.
 - 3. Submit a comprehensive statement providing the justification for the COM's employment of physician faculty (both FTE and adjunct) in the patient care environment who are not board certified or board eligible.

COUME proposes:

- 3. Submit a comprehensive statement providing the justification for the COM's employment of physician faculty (both FTE and adjunct) in the patient care environment who are not **AOA/ABMS** board certified or board eligible.
- **Pre-Accreditation Submission 7.2: Faculty Approvals at All Teaching Sites**, COCA proposes the following qualifications for Faculty Approvals at Teaching Sites.
 - 2. Submit a comprehensive and detailed statement explaining the circumstances why the COM employed any physician faculty in the patient care environment who are not board certified or board eligible.
 - 3. Complete Table 7.2.

Table includes:

Preceptor Name
 Clinical Site
 # of Students per rotation supervised by the preceptor
 Preceptor's status - Board cert? Board eligible
 Preceptor's discipline
 Preceptor appointed or approved as faculty?
 (must define appointment vs. approval)

COUME proposes:

- 2. Submit a comprehensive and detailed statement explaining the circumstances why the COM employed any physician faculty in the patient care environment who are not **AOA/ABMS** board certified or board eligible.
- 3. Complete Table 7.2.
- Table includes:
- Preceptor Name
 Clinical Site
 # of Students per rotation supervised by the preceptor
 Preceptor's status - **AOA/ABMS** Board cert? Board eligible
 Preceptor's discipline
 Preceptor appointed or approved as faculty?
 (must define appointment vs. approval)
- **Pre-Accreditation Submission 7.3: Department Chair Qualifications**, COCA no revisions:

COUME proposes:

2. For each clinical department chair, provide a copy of the Chair's **AOA/ABMS** board certification documents.
- **Pre-Accreditation Submission 7.4: Primary Care Leadership**, COCA proposes no revisions

COUME proposes:

4. Provide a copy of the Chair's **AOA/ABMS** board certification documents.

We thank COCA for the opportunity to review the proposed changes. I would be pleased to answer any questions you may have.

Sincerely,

Robert G. G. Piccinini, DO, DFACN

Robert G. G. Piccinini, DO, DFACN
Chair, Council on Undergraduate Medical Education (COUME)

cc: William S. Mayo, DO, AOA President
Adrienne White-Faines, AOA CEO
James Swartwout, COUME Secretary