

March 22, 2019

Janice A. Knebl, DO, MBA, FACOI, FACP  
Chair  
Commission on Osteopathic College Accreditation  
American Osteopathic Association  
142 E. Ontario Street  
Chicago, IL 60611

VIA Electronic Mail – [predoc@osteopathic.org](mailto:predoc@osteopathic.org)

Dear Dr. Knebl:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM)'s Council of Student Financial Aid Administrators (CSFAA), I write to respectfully provide recommendations regarding financial aid standards, as requested by the Commission on Osteopathic College Accreditation (COCA) on December 1, 2018.

Established by the AACOM Board of Deans, the CSFAA is one of AACOM's 12 councils which supports the work of the association, specifically on matters pertaining to student financial aid, on behalf of all AACOM member institutions. CSFAA membership consists of one voting representative appointed by the dean from each AACOM member college, who is responsible for the administration of student financial assistance at that institution.

As you know, the COCA Accreditation Element 9.7 states that the college of osteopathic medicine (COM) "must provide its students with counseling to assist them with financial aid applications and debt management." To comply with the *Evidentiary Submission for Addressing the COCA Continuing Accreditation Standards*, a COM must provide both a list of counseling sessions offered and a list of participants demonstrating that students who received financial aid under Title IV of the *Higher Education Act* engaged in a minimum of two counseling sessions while enrolled at the institution. In addition, COCA Accreditation Element 11.3 requires that a COM provide the current average debt for the last four years of its students, a public link to where the information is published, as well as the default rates on funds provided under Title IV of the *Higher Education Act* from the COM's students for the last four available years. On July 1, 2018, COMs were required to implement these requirements.

During the December meeting, COCA requested that the CSFAA provide recommendations on Elements 9.7 and 11.3 regarding best practices for financial aid counseling sessions and outcomes, benefits of annual counseling versus two counseling sessions over a four-year period, and the minimum number of financial aid staff needed for new COMs. In addition, the CSFAA has provided AACOM with feedback on the two standards, which has been incorporated into AACOM's comments to COCA.

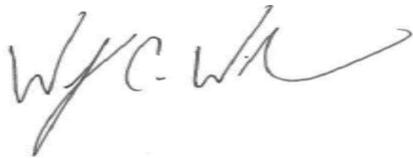
The CSFAA is seeking more discussion and clarification on the exact wording of the requirements for 9.7 and 11.3. Financial aid and debt management counseling session attendance

lists are not standardized among schools and enforcing attendance of the required sessions would be difficult due to a lack of consequences that can be tied to non-participation. In addition, it is difficult to hold schools responsible for student debt outcomes, particularly average debt and default rates, since they are always a result of students' choices. Moreover, average debt is affected by factors like tuition, cost of living, and endowments and scholarships, which are unaffected by counseling and vary from school-to-school.

As a result, the CSFAA strongly recommends the creation of a survey to be completed by all COM financial aid offices to collect data on staffing and best practices regarding financial aid and debt management counseling, webinars, sessions, etc. offered to students. The results would be shared with all COMs in order to determine a final list of recommended best practices to be provided to COCA.

On behalf of the CSFAA, I would like to thank you again for the opportunity to address COCA at its December meeting, and for your attention to this recommendation. The CSFAA welcomes the opportunity to discuss this further and looks forward to working with you to clarify accreditation standards that support academic quality and ensure that osteopathic medical students are provided with appropriate financial aid resources to make the best possible financial choices for their future. If you have any questions or require further information, please do not hesitate to contact me at (740) 593-2160 or [wilsonw@ohio.edu](mailto:wilsonw@ohio.edu).

Respectfully,

A handwritten signature in black ink, appearing to read 'Wesley Wilson', with a stylized flourish at the end.

Wesley Wilson, MBA  
Associate Director of Financial Aid  
Ohio University Heritage College of Osteopathic Medicine  
Chair, CSFAA

Cc: Stephen C. Shannon, DO, MPH  
President and CEO  
AACOM

Lori A. Kemper, DO  
Chair, AACOM Board of Deans  
Dean  
Arizona College of Osteopathic Medicine of Midwestern University