COCA Update – Current Statistics and Changes to Accreditation Standards
Janice A. Knebl, DO, MBA, MACOI, Chair, COCA
David A. Forstein, DO, FACOOG, Vice-chair, COCA
On August 22, 2018, the US Department of Education renewed recognition of COCA to continue to accredit programs and institutions that award the degree of Doctor of Osteopathic Medicine. This recognition is valid until 2021.
COCA Authority to Accredit – US Department of Education Recognition

“RELIABLE AUTHORITY REGARDING THE QUALITY OF EDUCATION OR TRAINING OFFERED BY THE INSTITUTIONS OR PROGRAMS THEY ACCREDIT”
### Current COCA Statistics

<table>
<thead>
<tr>
<th>Current</th>
<th>New and Developing COMs</th>
<th>Substantive Change Requests</th>
</tr>
</thead>
<tbody>
<tr>
<td>• 37 COMs&lt;br&gt;• 56 sites in 34 states&lt;br&gt;• Of the 37:&lt;br&gt;• 1 candidate status with right to recruit&lt;br&gt;• 2 candidate status</td>
<td>• 5 Active Applicant Status COMs&lt;br&gt;• 12 Non-Active Applicant Status COMs&lt;br&gt;• 15 Retired applications</td>
<td>• 1 Branch Campus Application Anticipated&lt;br&gt;• Other Active Substantive Change Requests (e.g., class size increase, etc.)</td>
</tr>
</tbody>
</table>
## COCA Statistics – Some Details of Expansion

<table>
<thead>
<tr>
<th>Candidate COMs</th>
<th>Additional Locations</th>
<th>Class Size Increases</th>
</tr>
</thead>
<tbody>
<tr>
<td>California Health Sciences University COM</td>
<td>LECOM Elmira</td>
<td>ATSU-SOMA</td>
</tr>
<tr>
<td>Minnesota COM</td>
<td>LMU-DCOM Knoxville</td>
<td>ACOM</td>
</tr>
<tr>
<td>Sam Houston State University COM</td>
<td>NSU-KPCOM Clearwater</td>
<td>2 Substantive Change Requests Expected including CSI</td>
</tr>
<tr>
<td></td>
<td>OSU-COM Talequah</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PCOM Moultrie</td>
<td></td>
</tr>
</tbody>
</table>
### Current COCA Composition

**17 MEMBERS:**

- Public college dean (1)
- Private college dean (1)
- Educators from colleges of osteopathic medicine, but who are not the dean (2)
- Director of medical education (1)
- Hospital administrator (1)
- Public members (3)
- Members-at-large (8)

**COCA meets three times per year.**

- April
- August
- December

Meetings are 3-4 days depending on the volume of the agenda.
Newly Approved COCA Composition

COCA meets three times per year.
- April
- August
- December

Meetings are 3-4 days depending on the volume of the agenda

Meetings held at AOA offices in Chicago and DC

17 MEMBERS:
- COM Deans (4)
- Educators (one clinical, one pre-clinical) from colleges of osteopathic medicine, but who are not deans (2)
- Graduate medical education leaders (2)
- Hospital administrator (1)
- Student services representative (1)
- Resident or physician in practice under five years (1)
- Physician member of a state medical licensing board (1)
- Public members (3)
- Members-at-large (2)
COCA Committees

- Executive Committee
- Annual Reports Committee
- Standards Review Committee
- Committee on College Accreditation Training
- Standards Review Taskforce
- Ethics and Professionalism Taskforce

Membership on committees includes:
- COCA Commissioners
- COM community
  - Administration
  - Faculty
  - Students
COCA Commissioner Conflicts of Interest

- All COCA Commissioners must disclose all actual and perceived conflicts of interest, including relationships with COMs to which a commissioner has a direct or indirect relationship.

- In particular, COCA public members must not have any relationship with any COM that is accredited by the COCA.
Select COCA Processes

- COCA Online: E-filing of all COCA submissions – self-studies, other submissions
  - Efficiency
  - Paper reduction
  - Ease of review
- Consultations with COCA Secretary
- Relationship building between COCA Commissioners and COM community
- Attendance at COCA meetings – live streamed for efficiency and conservation of resources
COCA Staff

- Vice President – Accreditation/COCA Secretary
- Associate Vice President – Accreditation/COCA Assistant Secretary
- Director of Accreditation
- Accreditation Program Manager
- Accreditation Operations Manager
- Accreditation Specialists (2)
- Accreditation Coordinator
## Newly Approved COCA Fees (Eff. 8/1/18)

<table>
<thead>
<tr>
<th>COCA Fee Schedule</th>
<th>Previous</th>
<th>New</th>
</tr>
</thead>
<tbody>
<tr>
<td>New COM Application Fee</td>
<td>6,000</td>
<td>100,000</td>
</tr>
<tr>
<td>Maintain Application Status</td>
<td>0</td>
<td>75,000/yr</td>
</tr>
<tr>
<td>Candidate Status Application Fee</td>
<td>0</td>
<td>100,000</td>
</tr>
<tr>
<td>Maintain Candidate Status</td>
<td>26,000/yr</td>
<td>50,000/yr</td>
</tr>
<tr>
<td>Pre-Accreditation Application Fee</td>
<td>46,000</td>
<td>50,000</td>
</tr>
<tr>
<td>Maintain Pre-Accreditation Status</td>
<td>46,000/yr</td>
<td>50,000/yr</td>
</tr>
<tr>
<td>Maintain Accreditation Status</td>
<td>38,000/yr</td>
<td>45,000/yr</td>
</tr>
<tr>
<td>Additional assessment w/ Warning</td>
<td>0</td>
<td>20,000/yr</td>
</tr>
<tr>
<td>Additional assessment w/ Probation</td>
<td>0</td>
<td>20,000/yr</td>
</tr>
<tr>
<td>Additional assessment w/ Heightened Monitoring</td>
<td>0</td>
<td>15,000/yr</td>
</tr>
<tr>
<td>Resubmission for evaluation of any type of application</td>
<td>0</td>
<td>25,000</td>
</tr>
<tr>
<td>Not Appealed</td>
<td></td>
<td></td>
</tr>
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Newly Approved COCA Fees (cont’d)

<table>
<thead>
<tr>
<th>Fee Type</th>
<th>Previous</th>
<th>New</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substantive Change Application Fee</td>
<td>36,000</td>
<td>100,000</td>
</tr>
<tr>
<td>Branch Campus (BC) (including class size increase)</td>
<td>36,000</td>
<td>100,000</td>
</tr>
<tr>
<td>Additional Location (AL) (including class size increase)</td>
<td>36,000</td>
<td>100,000</td>
</tr>
<tr>
<td>Transition from BC/AL to COM</td>
<td>0</td>
<td>100,000</td>
</tr>
<tr>
<td>Unplanned Class Size Increase</td>
<td>0</td>
<td>125,000</td>
</tr>
<tr>
<td>All Other Substantive Change</td>
<td>0</td>
<td>30,000</td>
</tr>
<tr>
<td>Show Cause Assessment Fee</td>
<td>0</td>
<td>125,000</td>
</tr>
<tr>
<td>Appeal Filing Fee</td>
<td>10,000</td>
<td>25,000</td>
</tr>
</tbody>
</table>
COCA Honoraria Increase (Eff. 8/1/18)

• Until August 1, 2018, the honoraria for COCA site evaluators were different based on whether they are DOs or non-DOs:
  • $750/day for DOs
  • $500/day for non-DOs

AOA approved equalizing honoraria for DOs and non-DOs alike to $750/day

Honoraria are paid by the COMs as part of the site evaluation costs
COCA Accreditation Standards

- Effective July 1, 2017
- Voluntary compliance as of January 1, 2018
- Mandatory compliance as of July 1, 2018
Accreditation Standards

- 12 accreditation standards, each with an accompanying set of core and non-core elements – 78 total elements
- All accredited COMs must meet Standards 1 - 11
- Standard 12 is applicable only when COCA serves as the institutional accreditor for the COM
- Each standard includes a concise statement of the principles that represent the standard
- Elements of each standard specify the components that collectively constitute the standard; they are statements that identify the variables that the COCA considers in evaluating a medical education program’s compliance with the standard
CORE and Non-CORE Elements

• CORE element - critical to maintain the educational quality of the program
  • COM will be found out of compliance with the standard if the COM fails to meet any core element within that standard

• Non-CORE elements are considered in the context of the totality of a COM’s response to each of the elements associated with a specific standard in the determination of the compliance with that standard
# COCA Accreditation Decisions Under 2017 Standards

- **Accreditation with Exceptional Outcome:** All standards and elements met – 10 year accreditation status
- **Accreditation:** All standards are met, but some elements must be addressed through progress report monitoring – 7 year accreditation status
- **Accreditation with Heightened Monitoring:** Fewer than THREE standards are non-compliant and ongoing monitoring will occur through progress report monitoring – 4 year accreditation status
- **Accreditation with Warning:** Between THREE and FIVE standards are non-compliant and ongoing monitoring will occur through progress report monitoring – 2 year accreditation status
- **Accreditation with Probation:** More than five standards are noncompliant - accreditation will be granted for no more than one year.
- **Withdrawal of Accreditation:** Quality of the educational program is compromised and the school was unable to come into compliance with all standards within the allotted timeframe.
Monitoring

- COCA monitors COMs through various methods at specified intervals (e.g., progress reports)
- COCA’s monitoring could lead to focused site visit
- COM must come into compliance with each standard or element within 24 months of the initial determination
- United States Department of Education regulations *REQUIRE* adverse accreditation when COM does not meet standard or element within 24 months of initial determination
Monitoring (cont’d)

- Annual Reports
- Mid-cycle Reports
- Comprehensive Site Visits
- Focused Site Visits
- Progress Reports
- Show Cause
- Complaints
COCA Standards Revision Process

- Standards Taskforce review of proposed revisions
- Standards Review Committee reviews proposed revisions by Taskforce
- Public posting of proposed revisions
- Open forum to consider proposed revisions
- COCA to consider revisions and public comments (including open forum comments)
- AOA Standards Review Council to approve to revisions
- Standards go into effect – target date: July 1, 2019
Continuing Accreditation Standards – Proposed Revisions

The following list of proposed revisions may change after further review by the COCA.

Element 1.7: Clinical Education Affiliation Agreements (CORE)
Element 2.1: Dean Qualifications (CORE)
Element 2.2: Full Time Dean (CORE)
Element 4.2: Security and Public Safety
Element 5.1: Professionalism (CORE)
Element 5.2: Diversity
Element 6.3: Maximum Length of Completion
Element 6.4: Osteopathic Core Competencies (CORE)
Element 6.5: Scientific Method
Element 6.9: Clinical Education (CORE)
Continuing Accreditation Standards – Proposed Revisions

The following list of proposed revisions may change after further review by the COCA.

- Element 7.1: Faculty and Staff Resources and Qualifications (CORE)
- Element 10.1: Osteopathic Educational Continuum
- Element 12.1: Incorporation of the Institution (CORE)
- Element 12.4: Chief Financial Officer (CORE)
- Element 12.7: Campus Security (CORE) – New
- Element 12.8: Public Information – New
- Element 12.9: Public Notification of Opportunity to Comment - New
- Element 12.10: Academic Freedom - New
Continuing Accreditation Standards – Evidentiary Submissions – Proposed Revisions
The following list of proposed revisions may change after further review by the COCA.

- **Submission 1.7**: Clinical Education Affiliation Agreements
- **Submission 2.1**: Dean Qualifications
- **Submission 2.2**: Full Time Dean
- **Submission 4.1**: Facilities
- **Submission 4.2**: Security and Public Safety
- **Submission 4.4**: Learning Resources
- **Submission 5.1**: Professionalism - TBD
- **Standard 6**: Curriculum – New Table 6
- **Submission 6.3**: Maximum Length of Completion
- **Submission 6.4**: Osteopathic Core Competencies
Continuing Accreditation Standards – Evidentiary Submissions – Proposed Revisions
The following list of proposed revisions may change after further review by the COCA.

• Submission 6.5: Scientific Method
• Submission 6.6: Principles of Osteopathic Medicine
• Submission 6.7: Self-Directed Learning
• Submission 6.8: Interprofessional Education for Collaborative Practice
• Submission 6.9: Clinical Education
• Submission 7.1: Faculty and Staff Resources and Qualifications
• Submission 7.2: Faculty Approvals at All Teaching Sites
• Submission 8.1: Research and Scholarly Activity
• Submission 9.5: Academic Counseling
• Submission 9.6: Career Counseling
Continuing Accreditation Standards – Evidentiary Submissions – Proposed Revisions

The following list of proposed revisions may change after further review by the COCA.

- Submission 9.7: Financial Aid and Debt Management Counseling
- Submission 10.1: Osteopathic Educational Continuum
- Submission 10.2: ACGME Accredited GME
- Submission 10.3: Osteopathic Recognition GME
- Submission 11.1: Program Assessment
- Submission 11.3: Student Debt Outcomes
- Submission 12.1: Incorporation of the Institution
- Submission 12.2: Degree and Other Educational Offerings (CORE)
- Submission 12.4: Chief Financial Officer (CORE)
- Submission 12.5: Title IV Responsibility
Continuing Accreditation Standards – Evidentiary Submissions – Proposed Revisions

The following list of proposed revisions may change after further review by the COCA.

- Submission 12.7: Campus Security (CORE) - New
- Submission 12.8: Public Information - New
- Submission 12.9: Public Notification of Opportunity to Comment - New
- Submission 12.10: Academic Freedom - New
INTER-ACCREDITATION ACTIVITIES

• COUNCIL FOR HIGHER EDUCATION ACCREDITORS (CHEA)

• ASSOCIATION OF SPECIALIZED AND PROFESSIONAL ACCREDITORS (ASPA)

• HEALTH PROFESSIONS ACCREDITORS COLLABORATIVE
QUESTIONS?

Brian G. KIM, JD
Vice President of Accreditation
Associate General Counsel
COCA Secretary
bkim@osteopathic.org
Office: (312) 202-8039
Mobile: (312) 937-3903