

# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

## ***HANDBOOK***

*(Effective: December 7, 2015)*



---

AMERICAN OSTEOPATHIC ASSOCIATION

# TABLE OF CONTENTS

## COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION HANDBOOK

<b>Introduction</b> .....	3
<b>Statement of Purpose</b> .....	3
<b>COCA Responsibilities</b> .....	3
<b>COCA Membership</b> .....	3
<i>COCA Voting Members</i> .....	4
<i>Chair</i> .....	5
Duties of the Chair .....	5
<i>Vice Chair</i> .....	5
Duties of the Vice-Chair .....	6
<i>Observers</i> .....	6
<b>COCA Operating Procedures</b> .....	6
<i>Meetings</i> .....	6
<i>COCA Actions</i> .....	7
Executive Session .....	7
<i>On-Site Visit Process</i> .....	7
Self-Study Review .....	7
<i>Progress Report Review</i> .....	7
<i>Annual Report Review</i> .....	8
<i>Registry of Evaluators of Colleges of Osteopathic Medicine</i> .....	8
<b>COCA Committees</b> .....	9
<i>Executive Committee</i> .....	8
<i>Committee on College Accreditation Training</i> .....	8
<i>Annual Report Review Committee</i> .....	9
<i>Standards Review Committee</i> .....	9
<b>Conflict of Interest</b> .....	9

## ***COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION HANDBOOK***

### **Introduction**

The American Osteopathic Association's Commission on Osteopathic College Accreditation (COCA) *Handbook* is a procedural guide established for the use by the COCA. The *Handbook* includes a description of the COCA's purpose, function, structure, operating procedures, and pertinent attached appendices. The COCA coordinates the accreditation process for the colleges of osteopathic medicine, and serves as the accrediting agency.

Copies of the *Handbook* are filed at the American Osteopathic Association, Department of Accreditation, 142 East Ontario Street, Chicago, Illinois 60611.

### **Statement of Purpose**

The AOA Commission on Osteopathic College Accreditation (COCA) serves the public by establishing, maintaining, and applying accreditation standards and procedures to ensure that academic quality and continuous quality improvement delivered by the colleges of osteopathic medicine (COMs) reflect the evolving practice of osteopathic medicine. The scope of the COCA encompasses the accreditation of the COMs.

The COCA will maintain its recognition as a reliable accrediting authority of the U.S. Secretary of Education according to the requirements in 34 CFR 602 or its successors. The COCA will evaluate the need to seek recognition from other organizations devoted to recognizing higher education accrediting agencies.

### **COCA Responsibilities**

The COCA serves as the accrediting agency for colleges of osteopathic medicine. In this capacity, the COCA reviews, evaluates, and takes final action on college accreditation status, and communicates such action to appropriate state and federal education regulatory bodies. In addition, the COCA approves the standards, policies and procedures for college accreditation, and approves this *Handbook*. The COCA reviews policy directions on predoctoral-osteopathic medical education, and monitors and maintains high-quality osteopathic predoctoral education through the college accreditation process.

### **COCA Membership**

The COCA has seventeen (17) voting members whose appointment will be staggered and be limited to no more than three consecutive three-year terms. Membership would be limited to a maximum of nine consecutive years. No member of the AOA Board of Trustees will serve as a member of the COCA.

The COCA will conduct, at its Fall meeting, an orientation and information program for all new members. New members will be provided a copy of the COCA Handbook, Standards of Accreditation, and orientation information.

The COCA will have one non-voting secretary. AOA Department of Accreditation staff will serve in this position.

### *COCA Voting Members*

Based upon the qualifications established by the COCA, nominations for open positions are solicited from AOA membership and stakeholder groups. The nominees are reviewed by an Education Nomination Committee consisting of representatives designated by the AOA and AACOM. The Education Nomination Committee then make a recommendation to the AOA President with final approval of members made by the AOA Board of Trustees subject to the procedures for appointment of members to AOA bureaus/ councils/ committees. COCA voting members include the following:

- 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)

Public college dean  
(Chief Academic Officer)

One position; three year term. Must be a dean from one of the public colleges of osteopathic medicine.

Private college dean  
(Chief Academic Officer)

One position; three year term. Must be a dean from one of the private colleges of osteopathic medicine.

Educators from the colleges of  
osteopathic medicine

Two positions; staggered three year terms. Educators from the colleges of medicine, but who are not deans of a college of osteopathic medicine. Educators may hold other academic administrative positions including associate dean, assistant dean, department chair, course director, course coordinator or other similar positions.

Director of Medical Education

One position; three year term. Must be from an internship or residency program approved by the AOA Program and Trainee Review Committee (PRTC).

Hospital Administrator

One position; three year term.

## Public Members

Three positions; staggered three year terms. Must have experience in higher education or accreditation, or public service that allow the public member to bring the perspective of one or more “external publics” to the evaluation of colleges of osteopathic medicine. Public members must further meet the criteria set forth by the US Department of Education.

At the time of appointment, each public member of the COCA will execute a sworn affidavit attesting to his/her compliance with the requirements of the U.S. Department of Education for public members.

At the beginning of each new year of the COCA following the AOA annual meeting in July, each public member will execute a sworn affidavit attesting to his/her compliance with requirements of the U.S. Department of Education for public members.

## AOA Members-at-large

Eight positions; staggered three year terms. Must be osteopathic physicians who are AOA members in good standing.

## Chair & Vice-Chair

### *Chair*

The AOA president appoints the chair, for a two year term, from within the membership of the COCA.

### Duties of the Chair

The chair presides over all meetings of the COCA. The chair appoints the membership of the committees described in this *Handbook* and, with approval of the COCA, may establish and appoint the membership of *ad hoc* subcommittees, for which he/she is an ex-officio member. The chair also oversees the selection of, qualified evaluators to serve on visits to the COMs, and COCA members to review progress reports, self-study reports, and annual reports.

In addition to the review of all agenda material, the COCA chair, will assign two COCA members to review COM progress report material, self-study reports, annual reports, or other agenda material as necessary. These members will provide a written report and present their findings and recommendations to the COCA for further discussion.

### *Vice-Chair*

The AOA president appoints the vice-chair from within the membership of the COCA.

### Duties of the Vice-Chair

The vice-chair will assume the duties of chair in the event the chair is absent for cause, or if the chair so designates.

### *Observers*

By precedence, all meetings of the COCA are open to the public. Observers include, but are not limited to, representatives of state and federal accrediting regulatory bodies. The presence of observers will be acknowledged by the chair and recorded in the COCA minutes.

## **COCA Operating Procedures**

### *Meetings*

The COCA holds three regularly scheduled meetings per year, ordinarily occurring on the weekends in spring, summer, and late fall. All meetings, together with their topical agendas, are announced on the COCA website currently at <http://www.aoacoca.org>.

The COCA will conduct its meetings in a hearing room format; voting members of the COCA and the non-voting secretary and assistant secretary will be seated separately from the gallery seating. Gallery seating is open to public attendees. A testimony table will be designated and placed closer to the COCA seating than that of the gallery seating. The COCA will receive oral reports and comments from all individuals who are not voting commission members from the testimony table.

A simple majority of commission members will constitute a quorum.

The COCA operates on *Robert's Rules of Order*, newly revised, 11<sup>th</sup> edition.

### *COCA Actions*

The COCA will act to approve or deny accreditation within policies and procedures adopted in the *Accreditation of Colleges of Osteopathic Medicine: College Accreditation Standards and Procedures*. The COCA may defer, to a specific time, a decision 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.

The COCA and/or its Executive Committee 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 would be issued in circumstances where information that a COM may be out of compliance with an accreditation standard, procedure or requirement issued by the COCA appears to be accurate. The Show Cause letter will advise the COM or other entity of the alleged non-compliance and allow the COM or other entity an opportunity to appear at the next COCA meeting in order to

present the COCA with factual and/or legal reasons why it should not be found to be out of compliance with an accreditation standard, procedure or requirement issued by the COCA. The Show Cause letter, if issued at the instruction of the Executive Committee, will be circulated to the entire COCA membership before or at the same time it is issued to the COM or other entity.

The COCA will be responsible for the expenses of individuals invited to attend meetings at the specific request of the chair. However, the COCA will not be responsible for the expenses of individuals attending the COCA for the following purposes: (a) to offer testimony on behalf of a COM; (b) to offer commentary regarding revisions to a document of the COCA; or (c) to offer “third party” commentary on a proposed action before the COCA.

### *Executive Session*

Although the COCA conducts its meetings in an open format, there are a few, defined instances in which the COCA will conduct its business in executive session. For example, the COCA will employ executive session for testimony that it deems to be confidential, such as deliberations on accreditation decisions, review of progress reports, substantive changes, and other accreditation actions.

Because the COCA functions in the interest of all stakeholders, including internal and external publics, decisions pertaining to an accreditation status – pre-accreditation, provisional accreditation, accreditation – and decisions pertaining to approval of 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 Executive Committee.

### **On-Site Visit Process**

The on-site visit process begins with the site visit schedule. The COCA is responsible for scheduling the on-site visits, the composition of the visiting team, and on-site visit report preparation. The COCA makes decisions about the COM accreditation status.

### *Self-Study Review*

The COCA will conduct its own review of the COM self-study prior to the meeting where the COM’s full or provisional site visit will be reviewed. Two members will be asked to conduct the review and provide a written analysis of their findings utilizing the Self-Study Analysis Tool.

All members of the COCA will be given access to the COM self-study and attachments that may be provided by the COM prior to their deliberation on the self-study report. This will be accomplished by: (1) password-protected materials available on the COCA website in advance of the meeting; (2) electronic copies of the materials available at the COCA meeting.

### **Progress Report Review**

Progress reports will be reviewed by two COCA members. These reviewers will provide the rationale for their findings utilizing the Progress Report Review Form.

### **Annual Report Review**

Annual reports and annual supplemental reports will be reviewed utilizing a two reviewer system with a primary and secondary reviewer. Selected tabular data will be reviewed from the AACOM/AOA Annual Osteopathic Medical School Questionnaire; data from previous reviews will also be provided. In addition to the tabular data, reviewers will review the qualitative data from the Annual Supplemental Report.

### **Mid-Cycle Report Review**

Mid-cycle reports will be reviewed utilizing a two-reviewer system with a primary and secondary reviewer.

### **Registry of Evaluators of Colleges of Osteopathic Medicine (*Evaluators Registry*)**

The COCA will review the composition of the *Evaluators Registry* on an annual basis. This review will include, but not be limited to, the following criteria: attendance at accreditation training workshops; current occupational status, and standard evaluations of site visit team members. Based upon findings of review, the COCA may solicit specific candidates as needed. The COCA will review credentials of all candidates and approve the candidates as appropriate.

Any COCA member who serves on a site visit team cannot take part in COCA discussion and vote on the action relating to the site visit in which he/she participated.

### **COCA Committees**

#### *Executive Committee*

The purpose of the Executive Committee is to function in well-defined, limited roles between regularly scheduled meetings of the COCA. The Executive Committee will include five COCA members, including the chair and vice-chair and will meet by teleconference as needed.

The Executive Committee will provide the following:

- Review of COCA accreditation documents and its *Handbook*, with recommendation to the COCA for consideration of areas for revision
- Technical review of substantive change applications
- Technical review of applications for new COMs
- Technical review of branch campus applications
- Authorization of focused visitations based upon information obtained between regularly scheduled meetings
- Standards interpretation



### *Committee for College Accreditation Training (CCAT)*

The CCAT is a standing committee of the COCA. The purpose of the CCAT is to develop and implement educational programs to assist COCA Evaluators, the COMs, and others involved in the accreditation process in conducting on-site accreditation visits and other issues pertinent to the accreditation process in general.

The CCAT recommends COM accreditation training workshop programs to the COCA for its approval. The CCAT is responsible for all aspects of planning and conducting workshops.

The CCAT will ordinarily meet via teleconference. Special meetings may be conducted “face to face” at the direction of the COCA chair. The CCAT chair will report on all recommendations to the COCA.

All CCAT members and the committee chair will be appointed annually by the COCA chair. Three members will be COCA members. Two individuals will be from outside the COCA. The COCA chair serves as an ex-officio member.

### *Annual Report Review Committee*

This committee meets minimally at least on an annual basis, via teleconference, to review the tabular data collection form and the questions in the Annual Supplemental Report. All Annual Report Review committee members and the committee chair will be appointed annually by the COCA chair. Between three and five COCA members serve on this committee. The COCA chair serves as an ex-officio member.

### *Standards Review Committee (SRC)*

This committee meets minimally at least on an annual basis to review proposed changes to the Standards of Accreditation. All proposed changes to the Standards of Accreditation will be open for public comment, either in written format or via a COCA Standards Forum.

All SRC members and the committee chair will be appointed annually by the COCA chair. Between three and five COCA members serve on this committee. The COCA chair serves as an ex-officio member.

## ***Conflict of Interest Policy***

### *Introduction*

This document shall serve as a comprehensive statement on the conflict of interest policy for the American Osteopathic Association’s Commission on Osteopathic Accreditation (COCA) and its constituent committees and subcommittees, which will hereafter be included in all references to “COCA”. The policy statement governs treatment of actual, apparent and alleged conflicts of interest and appearances of impropriety that may arise during the deliberations and actions of the COCA. The policy is intended to facilitate the disclosure and resolution of conflicts of interest. These policies are applicable to members of the COCA, COCA staff, members of the Evaluators Registry participating as site visit team members, and consultants.

With respect to conflicts of interest, the policy of the COCA shall be to err on the side of caution in order to safeguard the integrity of the COCA. Members of the COCA, the Evaluators Registry, and COCA staff should be sensitive not only to the existence of a conflict of interest, but also to the possible appearance of improper conduct where no conflict of interest may exist. The following conflict of interest policy is consistent with a COCA member's responsibilities under the Duty of Loyalty<sup>1</sup> and Duty of Obedience.<sup>2</sup>

### *Principles of Conflict of Interest*

#### What is a Conflict of Interest?

A conflict of interest arises where an individual on the COCA, COCA staff, or a member of the Evaluators Registry participating as a site visit team member, due to a financial, personal or other relationship with an entity under consideration, or an expression of bias / prejudice, may be unable to act based solely on an objective analysis of the information presented. The presence, or even the perceived presence, of a conflict of interest suggests that the conflicted individual may not have acted consistent with the legal duties of loyalty and/or obedience. This, in turn, raises the question of whether the COCA's discussion and eventual decision may have been influenced by factors other than the information presented to the COCA. For example, bias may be present from consideration of information that is not entered into the record, but is known only to one or more members of the decision making body. More seriously, prejudice, a literal pre-judgment in advance of the proceeding itself, may have occurred with one or more members of the decision making body. Although courts typically grant considerable deference to the professional judgment used to reach substantive decisions made by private accrediting and certifying agencies, the presence of bias and/or prejudice or the failure to follow the defined procedures for handling conflicts of interest may provide the basis for overturning the decision of the accrediting or certifying body.

#### What Circumstances Create a Conflict of Interest?

A conflict of interest arises where an individual member of a bureau, council or committee may be influenced in her or his 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:

1. A business or financial relationship with an individual or program under consideration

---

<sup>1</sup> 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, several members of a bureau, council or committee may also be officers or members of another organization or entity. In satisfying the duty of loyalty, those individuals would be expected to take actions based upon the best interest of the AOA's COCA rather than what might be the best interest of the particular organization of which he is also a member.

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

2. A direct familial relationship with an individual under consideration or with an officer of an entity under consideration
3. An employment or consulting (past or current) relationship with an entity under consideration
4. Employment or other relationship with a competitor of a program under consideration

Unfortunately, the list of potential conflicts may include some situations in which there is no conflict present and not identify situations in which there are actual conflicts. Although, we cannot provide an all-encompassing, perfectly accurate list of situations that constitute a conflict of interest, the principles of disclosure and resolution of conflict of interest are understood and can be clearly stated and explained. It is then incumbent upon the COCA members, COCA staff, and members of the Evaluators Registry participating as site visit team members to understand and comply with the disclosure and resolution process discussed in greater detail below. Because of the primary role that staff plays in the daily conduct of business of the COCA, it is particularly important that they exhibit the highest degree of professional conduct with strict adherence to this policy.

#### What are the Elements of Disclosure of Conflicts?

Disclosure represents the first step in addressing conflicts of interest.

1. The primary responsibility for disclosure of what may or may not be a conflict of interest rests with the members of the COCA. Beginning in July 2005, COCA staff will distribute a conflict of interest statement to all COCA members and members of the Evaluators Registry. Thereafter, COCA members will be asked to disclose potential conflicts of interest at the time the agenda is finalized in the beginning of each COCA meeting. Such disclosure may be made by the member directly or about another member. In the latter case, the member accused of a conflict of interest will have the opportunity to respond to that assertion.
2. A secondary responsibility rests with the COCA staff, to review the curricula vita and disclosure statements of the members and make potential conflicts known to the Chair prior to the meeting. COCA staff also has the responsibility to disclose stated conflicts of members of the Evaluators Registry when assembling teams who will conduct on-site evaluations.
3. Finally, the individuals and programs that have issues before the COCA will have the opportunity to present any concerns they may have with respect to conflicts of interest of the voting members either in advance of the meeting or at the meeting. With respect to composition of the on-site evaluation team, the COM being visited will have the opportunity to reject a proposed evaluator whom it believes may have a conflict of interest with that COM.

The determination that a conflict of interest exists and the resolution of existent conflicts of interest rest with the COCA, and not with the individual member. Ordinarily, this decision will be made by the Chair or other presiding officer on behalf of the entire body<sup>3</sup>. However, upon request from any voting member of the COCA, the decision that a conflict of interest exists will be subject to debate and decision by the voting members. The individual member under discussion will have the right to respond regarding the alleged conflict, but will be recused from deliberating and voting on the determination that a conflict exists. Affected COMs also have the right to raise a question of conflict of interest for these groups before the entire COCA for determination and resolution.

### How Are Conflicts of Interest Brought to Resolution?

The final step in handling conflict of interest situations is the resolution of a conflict that is determined to exist. Disclosure and agreement on the presence of a conflict are not alone sufficient to deal with a conflict of interest. The conflict of interest must be resolved to demonstrate to all present that opportunity for bias or prejudice has been removed. Stated another way, the internal publics and external publics should be comfortable that the COCA members present for discussion and voting on a matter have been examined for conflicts and, where appropriate, recused.

In general, the level of resolution selected should be appropriate to the perceived degree of conflict. The three levels described below, represent attempts to clarify points in what is truly a continuum. Accordingly, just as it is not possible to list all conflicts, it is not possible to offer a complete listing of resolutions.

Conflicts of interest pertaining to discussion, deliberation and voting by the COCA should be resolved with focus on three different levels of resolution:

- (a) Recusal of the member from voting, but allowing that member to participate in the deliberation. In this level, the member would be allowed to remain in the room for deliberations and, if appropriate, offer testimony about the matter. She/he would be allowed to be present in the room when the vote is taken, but would *not* vote.
- (b) Recusal of the member from both deliberation and vote. At this level the member would be asked to leave the room and would *not* be allowed to participate in either the deliberation or voting.
- (c) Complete recusal from testimony, deliberation and voting. At this level, the member would be asked to leave the room while the entire agenda item is discussed and acted upon. Although this may intuitively seem to be the ideal way of resolving all conflicts, it must be remembered that many AOA committee meetings are open to the public and, consequently, discretion should be applied when asking someone to leave the room for testimony that is otherwise being given in open session during the meeting. If it is determined that the conflicted member's presence would be detrimental to those offering and receiving testimony, that individual should not remain in the room.