

**Accreditation of Colleges of Osteopathic
Medicine:
COCA Substantive Change Policies and
Procedures**

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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 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 certified institution for greater than 25% 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:

- a. The rationale for the change;
- b. The effect this change will have on learning outcome assessments, facilities, faculty, admission policies and procedures, and the curriculum;
- c. Governing body review and approval; and
- d. Announcement of the proposed change to students, faculty, staff, alumni, and the public.

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.

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
4. Governing body discussion and approval.

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

Monitoring: 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; NOT merely a modification, pilot project involving less than 20% of the student body, or adjustments made as part of the routine curricular improvement process. This may include, but is not limited to, a change to an online curriculum, a change to a three-year medical

education program, or a change from a full lecture-based curriculum to a full problem-based learning curriculum.

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

Monitoring: All monitoring will occur as part of the routine annual reporting to the COCA

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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.

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.

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) completed by an external business consulting group
2. Additional Location Substantive Change Self-Study (via COCA-Online)
3. Approval from Regional Accreditor and all State Licenses to Operate/ Offer the Degree
4. Application Fee (\$32,000) (non-refundable)

Site Visit: A Pre-Operations Site Visit will be completed to assess the adequacy of the application (before application is brought to COCA).

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. Other monitoring will occur as part of the routine annual reporting to the COCA

Branch Campus

DEFINITION: Only a free-standing COM having accreditation status from the COCA as its institutional accreditor will have the option of offering instruction at a Branch Campus owned or operated by the COM.

A branch campus is a secondary location of a COM where at least 50% of the education may take place. The branch campus must share a singular administration including CEO and governing board. The branch campus may have a separate curriculum, separate faculty, and separate budget from the parent campus. 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.

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) completed by an external business consulting group
2. Branch Campus Substantive Change Self-Study (via COCA-Online)
3. State Licenses to Operate/ Offer the Degree
4. Application Fee (\$32,000) (non-refundable)

Site Visit: A Pre-Operations Site Visit will be completed to assess the adequacy of the application (before application brought to COCA).

To ensure adequate operating reserve availability, a proposed Branch Campus must place an Operating Reserve Escrow Fund equal to the Class Size x Tuition x 4 x .25. This fund will be released upon graduation of the first class of students from the Branch Campus.

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. Other monitoring will occur as part of the routine annual reporting to the COCA

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 Campus

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, see Transition Policy.

If the COCA no longer serves as the Institutional Accreditor for the COM, a Branch Campus should prepare to transition to an independent COM.

Transition Policy

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

1. Submit an application fee (\$32,000)
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 as described in the New & Developing COM Standards
6. Obtain a USDE Recognized Regional or Institutional Accreditor

The COM in transition will be granted a Preliminary 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 Full accreditation with release of the Escrow Account.

The Branch Campus wishing to transition to an Additional Location must...

1. Submit an application fee (\$32,000)
2. Complete an Additional Location Self-Study

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3. Undergo a site visit
4. Obtain a USDE Recognized Regional or Institutional Accreditor

Contracting with a non-Title IV certified institution for greater than 25% of a program

DEFINITION: A contract with a non-Title IV certified 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 more than 25 percent (25%) of the COM's educational program.

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.

If the instruction will occur at a different geographic location from the COM, and represents 50% or more of the program offering, then this will be reviewed as a Substantive Change–Additional Location.

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.

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.

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 in the region

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

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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.

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.