

Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards

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Introduction

The American Osteopathic Association’s Commission on Osteopathic College Accreditation (COCA) accredits osteopathic medical education programs leading to the DO degree in the United States (programmatic accreditation). The COCA also accredits free-standing colleges of osteopathic medicine where no other educational program is offered (institutional accreditation) and serves as the federal Title IV gatekeeper for those institutions. By assessing the compliance of osteopathic medical education programs based on the nationally accepted standards of the COCA, we serve the interests of the public and of the students enrolled in our Colleges of Osteopathic Medicine (COMs).

To achieve and maintain accreditation, an osteopathic medical education program leading to the Doctor of Osteopathic Medicine (DO) degree must meet the standards contained in this document.

The COCA regularly reviews the accreditation standards, and seeks feedback from the osteopathic community and public. Changes to the COCA standards are considered at a public hearing before a final vote for adoption is made by the COCA. Once approved, new or revised standards are published in *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards*, which indicates when the changes become effective.

The *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards* is organized around twelve (12) accreditation standards, each with an accompanying set of elements. The first eleven (11) standards must be met by all COMs with full accreditation; standard 12 is applicable only when COCA serves as the institutional accreditor for the COM. Each of the standards includes a concise statement of the principles that represent the standard. The 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.

Within each standard, there are multiple elements that are identified as “core elements.” A core element is critical to maintain the educational quality of the program. Therefore, a COM will be found out of compliance with the standard if the COM fails to meet any core element within that standard. The COCA will consider other non-core elements, which, while important, 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.

In the event a COM fails to meet any standard or element, the COCA will monitor the COM via progress reporting at specified intervals. The COM must come into compliance with each

standard or element within twenty-four months of the initial determination. The United States Department of Education (USDE) requires all standards to be compliant and all elements met within this timeframe or the COCA must take an adverse accreditation action against the COM.

In addition to determining whether elements are met and standards are compliant, the COCA must make an accreditation decision for a COM. The following are the possible accreditation actions:

Accreditation with Exceptional Outcome: This indicates that all standards are compliant and all elements are met. For schools with this status, accreditation will be granted for ten years.

Accreditation: This indicates that all standards are compliant. However, there may be unmet elements that must be addressed via progress reporting. For schools with this status, accreditation will be granted for seven years.

Accreditation with Heightened Monitoring: This indicates that fewer than three standards are non-compliant and ongoing monitoring will occur via progress reporting. For schools with this status, accreditation will be granted for four years.

Accreditation with Warning: This indicates that between three and five standards are non-compliant and ongoing monitoring will occur via progress reporting. For schools with this status, accreditation will be granted for two years.

Accreditation with Probation: This indicates that more than five standards are non-compliant. For schools with this status, the accreditation will be granted for no more than one year.

Withdrawal of Accreditation: This indicates that the quality of the educational program is compromised and the school was unable to come into compliance with all standards within the allotted timeframe.

More detail on the accreditation actions may be found in the *Accreditation of Colleges of Osteopathic Medicine: COCA Policies and Procedures* document. Additional information about the accreditation process and the standards and elements may be obtained from the COCA office (predoc@osteopathic.org) or from the COCA website (www.aoacoca.org).

Standards

Standard 1: Mission and Governance

A COM must have a written statement of mission and goals for the osteopathic medical education program, conduct ongoing planning and assessment, and have written bylaws that describe an effective organizational structure and governance processes. In the conduct of all internal and external activities, the COM must demonstrate integrity through its consistent and documented adherence to fair, impartial, and effective processes, policies, and practices.

Element 1.1: Program Mission: (CORE) A College of Osteopathic Medicine (COM) must produce and publish a written mission statement for the program that explains the overall purpose of the program and serves as guide for program planning. If the COM is part of a larger educational institution (parent institution), the COM's mission shall be consistent with the institution's mission. The COM must review the program mission periodically and revise it as appropriate, **including faculty and students, at a minimum, in the process.**

Element 1.2: Strategic Plan: A COM must produce and publish a strategic plan addressing all core aspects of the COM mission. **The strategic plan review and revision must include faculty and students, at a minimum.**

Element 1.3: Licensing and Regional / Institutional Accreditation: (CORE) A COM must maintain in effect any charter, licenses, or approvals required for it to function as an institution of higher education, including the provision of degree programs beyond the secondary level.

The parent / sponsoring institution under which the COM operates (or the independent COM itself) must be recognized by an institutional accrediting agency that is recognized by the USDE. The COM must report to the COCA any adverse actions that are taken against its parent institution by its institutional accreditor within five business days of receipt **notification** of such action.

Element 1.4: Governance & Program Policies: (CORE) A COM must have a governing body, or be part of a parent institution with a governing body, that defines the mission of the **COM and/or** institution, approves the strategic plan, provides financial oversight, and approves requisite policies. The COM must publish and abide by ~~board-approved~~ policies regarding:

- a. Conflict of Interest for board members, employees, and institutionally employed faculty.
- b. Due process for all employees, students, faculty, and credentialed instructional staff.
- c. Confidentiality of employment, student, and medical records.
- d. Fiscal management and accountability.
- e. Ethics, incorporating the AOA Code of Ethics.

Element 1.5a: Non-Discrimination: (CORE) A COM must demonstrate non-discrimination in the selection of administrative personnel, faculty and staff, and students based on race, ethnicity, color, sex, sexual orientation, gender, gender identity, national origin, age or disabilities, and religion.

Element 1.5b: Non-Discrimination for Faith Based Institutions: The COCA respects the religious mission of faith based schools. A COM having a religious affiliation or purpose may apply selection criteria and/or policies that are directly related to that affiliation or purpose so long as any such criteria and/or policies are made known to applicants and the public and do not contravene any other COCA standard.

Element 1.6: Degree-Granting Body: The governing body of the COM must confer the degree Doctor of Osteopathic Medicine (DO) upon those students who have satisfactorily completed the requirements for graduation and have been recommended for graduation by faculty.

Standard 2: Leadership and Administration

A COM must have leadership and senior administrative staff with the knowledge, skills, time, and support necessary to achieve the goals of the osteopathic medical education program and to ensure the functional integration of all programmatic components.

Element 2.1: Dean Qualifications: (CORE) A COM must have a Chief Academic Officer (typically referred to as a Dean) who is qualified by education, training, and experience to provide effective leadership in education, scholarly activity, and patient care. The Chief Academic Officer Dean shall have an earned DO degree from a COCA accredited College of Osteopathic Medicine, medical license, board certification (at some time in his/her career), and at least five years' experience in academic leadership roles that include budget management authority.

Element 2.2: Full Time Dean: The Chief Academic Officer Dean must be employed full-time by the COM and/or its parent institution.

Element 2.3: Academic and Administrative Leadership: A COM must have academic and administrative leadership to accomplish the mission of the medical school. Assistant/Associate Deans must have proven experience in teaching, educational design and evaluation, scholarly activity, and academic leadership in a medical education setting appropriate for the position.

Element 2.4: Accreditation Standard Complaint Policies and Procedures: (CORE) A COM must publish policies and procedures that include a confidential accreditation standard complaint resolution process that includes a description of how these complaints are filed, resolved through an adjudication process, and maintained through the COM's records retention system. The accreditation standard complaint filing process must include a process for filing confidential complaints with the COCA and the contact information of the COCA.

Standard 3: Finances

A COM must have sufficient financial resources readily available to meet **the needs of the COM** and to achieve **the COM** mission, consistent with its projected and authorized student cohort and class size.

Element 3.1: Financial Resources: (CORE) A COM must ensure that the financial resources of the school **meet the requirements of Title IV of the Higher Education Act** and are adequate to sustain a sound program of osteopathic medical education and to accomplish the programmatic and institutional goals.

Element 3.2: Financial Planning and Budgeting: A COM must have a budgeting process that is designed to support the mission of the COM.

Element 3.3: Budgetary Authority: A COM or parent institution must provide the Dean with the resources and budgetary authority necessary to fulfill his or her responsibility for the management of the COM.

Element 3.4: Financial Audit: (CORE) A COM or its parent institution must commission an annual independent audit confirming financial viability and provide evidence of resolution of concerns cited in the audit's accompanying management letter.

Standard 4: Facilities

A COM must have sufficient physical facilities, equipment, **and resources for clinical, instructional, research, and technological functions of the COM. These resources must be readily available and accessible** across all COM locations to meet its needs, the needs of the students consistent with the approved class size, and to achieve its mission.

Element 4.1: Facilities: (CORE) A COM must have facilities for the program of instruction that enable the authorized class size of students and faculty to pursue the mission, curriculum, and scholarly activity of the COM.

Element 4.2: Security and Safety: A COM must **ensure that adequate security systems are in place** and publish and follow policies and procedures for security; faculty, staff, and student safety; and emergency and disaster preparedness at all COM operated teaching and training locations.

Element 4.3: Information Technology: A COM must provide access to information technology to support its mission.

Element 4.4: Learning Resources: A COM must provide access to learning resources to support its mission.

Standard 5: Learning Environment

A COM must ensure that its educational program occurs in professional, respectful, non-discriminatory, and intellectually stimulating academic and clinical environments. The school also promotes students' attainment of the osteopathic core competencies required of future osteopathic physicians.

Element 5.1: Professionalism: A COM must ensure that the learning environment of its osteopathic medical education program is conducive to the ongoing development of professional behaviors in its osteopathic medical students, faculty, and staff at all locations and is one in which all individuals are treated with respect. This should also include exposure to aspects of patient safety, cultural competence, and interprofessional collaborative practice.

Element 5.2: Diversity: A COM must publish and follow policies to achieve mission-appropriate diversity outcomes among its students, faculty, senior administrative staff, and other relevant members of the academic community.

Element 5.3: Safety and Health: A COM must publish and follow policies and procedures that address effectively mitigate faculty, staff, and student exposure to infectious and environmental hazards, provide education on prevention of such exposures, and address procedures for care and treatment after such exposures.

Element 5.4: Patient Care Supervision: (CORE) A COM must ensure that osteopathic students in clinical learning situations involving patient care are directly supervised at all times in order to ensure safety and responsibility appropriate to the level of training. The COM must ensure that all supervised activities are within the scope of practice of the supervising health professional, and, if, not a physician must be supervised by a physician. Students must have clear guidelines on their role in care and the limits of their scope of authority.

Standard 6: Curriculum

The faculty of a COM must define how the students will achieve the educational program objectives, including osteopathic core competencies¹, and is responsible for the detailed design and implementation of the components of a curriculum that enables its students to achieve those competencies and objectives. Educational program objectives are statements of the knowledge, skills, behaviors, and attitudes that osteopathic medical students are expected to demonstrate as evidence of their achievement prior to successful completion of the program.

The faculty of a COM must periodically and regularly review and revise the COM's curriculum and evaluate the COM's educational program to ensure that the quality of the program meets the current standards of osteopathic core competencies and that students achieve all program objectives and participate in required clinical training experiences and environments.

Element 6.1: Curriculum Design and Management: (CORE) A COM must have in place a body (e.g., a faculty committee) that exercises collective ownership over (versus responsibility for) the education program as a whole, and has responsibility for the overall design, development, management, evaluation, and enhancement of the curriculum. This committee must include student representation from the pre-clinical (years 1 and 2) and clinical education (years 3 and 4) years. The curriculum must meet the mission of the COM.

Element 6.2: Educational Objectives: The COM must define and make all programmatic learning objectives known to students, faculty and others with responsibility for student education and assessment.

Element 6.3: Maximum Length of Completion: A COM must ensure that each student completes the DO degree within 150% of the standard time to achieve the single DO degree (six years). *(If a student is on formal leave and not paying tuition, the time is neutral and not counted toward the time to achieve the degree.)*

Element 6.4: Osteopathic Core Competencies: (CORE) A COM must teach and train students to ensure development of the seven osteopathic core competencies (as noted at www.osteopathic.org) of medical knowledge, patient care, communication, professionalism, practice based learning, systems based practice, and osteopathic principles and practice/ osteopathic manipulative treatment.

Element 6.5: Scientific Method: A COM must ensure that the curriculum includes instruction in the scientific method including data collection to test and verify hypotheses or address questions regarding biomedical phenomena and in the basic scientific and ethical principles of clinical and translational research. The curriculum must include the methods by which such research is conducted, evaluated, explained to patients, and applied to patient care.

Element 6.6: Principles of Osteopathic Medicine: (CORE) A COM must provide each student, in each year of schooling, with opportunities for learning Osteopathic Principles and Practice (OPP), including both observation and hands-on application of osteopathic manipulative medicine (OMM) for patients supervised by COM credentialed DO physicians (DO or MD).

Element 6.7: Self-Directed Learning: A COM must ensure that the curriculum includes self-directed learning experiences and time for independent study to allow students to develop skills for lifelong learning. Self-directed learning includes students' self-assessment of learning needs; independent identification, analysis, and synthesis of relevant information; and appraisal of the credibility of sources of information.

Element 6.8: Interprofessional Education for Collaborative Practice: (CORE) A COM faculty must ensure that the core curriculum prepares osteopathic medical students to function collaboratively on health care teams (adhering to the IPEC core competencies) by providing opportunities, in each year of the curriculum, to learn in academic and clinical environments that permit interaction with students and/or professionals enrolled in other health professions, graduate and professional degree programs.

Element 6.9: Clinical Education: (CORE) A COM faculty must define the types of patients and clinical conditions that osteopathic medical students are required to encounter, the skills to be performed by the students, the appropriate clinical setting for these experiences and the expected levels of student responsibilities.

Element 6.10: Clinical Experience: A COM must ensure that each student participates in one or more required **third year CORE clinical clerkship** experiences conducted in a health care setting in which the student works with resident physicians currently enrolled in an accredited program of graduate medical education. **In addition to the above expectation, a required third year clinical clerkship must be with a DO.**

Element 6.11: Comparability Across Clinical Education Sites: A COM must ensure that the curriculum includes comparable educational experiences and equivalent methods of assessment across all core clinical educational sites where students learn, ensuring all students achieve **similar outcomes based on core educational learning objectives.**

Element 6.12: COMLEX-USA: All students must successfully pass COMLEX-USA Level 1, Level 2 CE, and Level 2 PE prior to graduation from an osteopathic medical school. The COM must publish to the public the COMLEX -USA first time and final pass rate for all students in each class at the COM.

Standard 7: Faculty And Staff

The faculty members at a COM must be qualified through their education, training, experience, and continuing professional development and provide the leadership and support necessary to attain the institution's educational, research, and service goals.

A COM must ensure that its medical education program includes a comprehensive, fair, and uniform system of formative and summative medical student assessment and protects medical students' and patients' safety by ensuring that all persons who teach, supervise, and/or assess medical students are adequately prepared for those responsibilities.

Element 7.1: Faculty and Staff Resources and Qualifications: (CORE) At all educational teaching sites, including affiliated sites, a COM must have **sufficient faculty and staff resources** to achieve the program mission, including part time and adjunct faculty, who are appropriately trained and degreed. The physician faculty, **in the patient care environment clinical departments**, must hold a graduate degree in an appropriate medical discipline and current medical licensure **and board certification**. The non-physician faculty must have appropriate qualifications in their fields.

Element 7.2: Faculty Approvals at All Teaching Sites: A COM must academically credential **and/or** approve the faculty at all COM and COM-affiliated and educational teaching sites.

Element 7.3: Department Chair Qualifications: A COM must employ Department Chairs (or their equivalent) with proven experience in teaching and **readiness for** academic leadership in a medical education setting. **For clinical department chairs, the chair must be board certified in the discipline in which they serve as chair.**

Element 7.4: Primary Care Leadership: A COM must employ a Doctor of Osteopathic Medicine with active board certification from a primary care discipline (see glossary) to serve as the Department Chair of Primary Care (or equivalent).

Element 7.5: OMM Leadership: (CORE) A COM must employ a Doctor of Osteopathic Medicine with active board certification from the American Osteopathic Board of Family Practice (AOBFP) **with a Certificate of Special Proficiency in OMM (C-SPOMM) or American Osteopathic Board of Physical Medicine and Rehabilitation (AOBPMR) with C-SPOMM** or the American Osteopathic Board of Neuromusculoskeletal Medicine (AOBNMM) to serve as the Department Chair of OMM (or equivalent).

Element 7.6: Faculty Development: A COM must develop and implement an ongoing needs-based, assessment-driven, faculty development program that is in keeping with the COM's mission.

Element 7.7: Faculty Association: A COM must have a faculty organization that serves as a representative forum for faculty participation in COM governance and **for** the free exchange of ideas and concerns of all faculty.

Element 7.8: Faculty Appointment and Advancement: A COM must have clear policies and procedures in place for faculty appointment, renewal of appointment, promotion, granting of tenure (if a tenure program exists), and remediation. The policies and procedures must provide each faculty member with written information about his or her term of appointment, responsibilities, lines of communication, privileges and benefits, performance evaluation and remediation, terms of dismissal, due process, and, if relevant, the policy on practice earnings.

Standard 8: Scholarly Activity

A COM must make contributions to the advancement of knowledge and the development of osteopathic medicine through scientific research and scholarly activity.

Element 8.1: Research and Scholarly Activity: (CORE) A COM must have a strategic plan and scholarly activities that document how the COM will contribute to the advancement of knowledge through research and scholarly contributions.

Element 8.2: Student Participation: A COM must publish and follow policies and procedures to support student driven research and scholarly activity, as well as student participation in the research and scholarly activities of the faculty.

Standard 9: ~~Students Services~~

A COM must establish and publish admission requirements for potential applicants to the COM program, and must develop and apply effective policies and procedures for medical student selection and enrollment.

A COM must develop and implement policies and procedures as well as provide the human and physical resources required to support and promote health and wellness in order to meet and advance the physical, emotional, mental, career, academic and professional needs of its students, faculty and staff. All osteopathic medical students of the COM have the same rights to and must receive comparable services.

Element 9.1: Admissions Policy: (CORE) A COM must establish and publish admission requirements for potential applicants to the COM **osteopathic medical education** program and must use effective policies and procedures for osteopathic medical student selection for admission and enrollment. A COM must tie all admissions policies to the COM mission.

Element 9.2: Academic Standards: (CORE) A COM must publish and follow policies and procedures on academic standards that include grading, class attendance, tuition and fees, refunds, student promotion, retention, graduation, academic freedom, students' rights and responsibilities, the filing of grievances and appeals, and **technical standards for admission**.

Element 9.3: Transfer Policies: A COM must publish and follow policies regarding transfer or admissions with advanced standing. A COM may only accept credits from a school accredited by the COCA or Liaison Committee on Medical Education (LCME) where the student is eligible for readmission. The COM must ensure that if transfer occurs from an LCME accredited school of medicine, the student must acquire OMM/OPP competency prior to graduation from the COM. The last two years of education must be completed at the COM granting the degree.

Element 9.4: Secure Student Recordkeeping: A COM must develop an accurate, confidential and secure system for student record keeping that includes: admissions, advisement, **academic and career** counseling, evaluation, grading, credits and the training of faculty and staff in the regulations surrounding these records.

Element 9.5: Academic Counseling: (CORE) A COM must ensure that faculty and staff provide academic counseling for its students to ensure that students can obtain academic counseling, learning resources, and assistance, as may be necessary.

Element 9.6: Career Counseling: (CORE) A COM must provide career counseling to assist its students in evaluating career options and applying to graduate medical education training programs.

Element 9.7: Financial Aid and Debt Management Counseling: A COM must provide its students with counseling to assist them with financial aid applications and debt management.

Element 9.8: Mental Health Services: (CORE) A COM must provide its students with access to an effective system of counseling and mental healthcare, ~~which is accessible 24 hours a day, 365 days a year, in all locations where students receive education from the COM.~~ **A mental health representative must be accessible 24 hours a day, 365 days a year, from all locations where students receive education from the COM.**

Element 9.9: Physical Health Services: (CORE) A COM must provide its students with access to diagnostic, preventive and therapeutic health services, accessible in all locations where students receive education from the COM.

Element 9.10: Non-Academic Health Professionals: A COM must ensure that any health professional providing health services, **via a therapeutic relationship**, ~~including psychiatric or psychological counseling services,~~ will recuse him/herself from the academic assessment or promotion of the student receiving those services.

Element 9.11: Health Insurance: **A COM must require that all students have health insurance.** ~~health insurance coverage is available to its students.~~

Standard 10: Graduate Medical Education (GME)

The faculty of a COM must ensure that the curriculum provides content of sufficient breadth and depth to prepare students for entry into a graduate medical education program and for the subsequent practice of medicine. The COM must strive to develop graduate medical education to meet the needs of its graduates within the defined service area, consistent with the mission of the COM.

Element 10.1: Osteopathic Educational Continuum: ~~The COM must support or join an educational consortium including undergraduate, graduate, and continuing medical education for supporting the continuum of osteopathic education.~~ **demonstrate policy, structure and procedures including undergraduate, graduate, and continuing medical education to support the continuum of osteopathic education.**

Element 10.2: Osteopathic Recognition GME: A COM must provide a mechanism to assist graduate medical education programs accredited by the Accreditation Council for Graduate Medical Education (ACGME) in meeting the requirements of osteopathic recognition.

Standard 11: Program and Student Assessment and Outcomes

A COM must assess both programmatic and individual student outcomes to ensure that the COM meets its mission. Additionally, a COM must use the data from programmatic and individual outcomes to continuously improve all aspects of the COM.

Element 11.1: Program Assessment: (CORE) A COM must connect its learning outcomes assessment to its program mission, goals, and objectives to continuously improve the educational quality of its osteopathic medical education program.

Element 11.2: Student Evaluation of Instruction: A COM must have policies and procedures in place to collect and consider **confidential** student evaluations of their courses, clerkships, faculty, and other relevant student experiences. The COM must demonstrate that these results incorporated into the COM's self-assessment to improve curriculum and address deficiencies in student **performance experiences**.

Element 11.3: Student Debt Outcomes: A COM must collect and publish data on the debt load and student loan default rates of its students in such a way that applicants can be aware of the information.

Element 11.4: Student Survey: A COM must provide a student survey of accreditation items as part of the comprehensive accreditation process.

Element 11.5: Program and Student Outcomes – Annual Data Update Reports: (CORE) A COM having accreditation status must submit specified annual reports to the COCA.

Element 11.6: Program and Student Outcomes – Mid-Cycle Update Report: (CORE) A COM having accreditation status must submit a “mid-cycle” report to the COCA on their success in meeting their mission.

Standard 12: Institutional Accreditation

For any COM that is not affiliated with a parent institution, the COCA may serve as both institutional and programmatic accreditor. When the COCA serves as the institutional accreditor, the COM must demonstrate that it is compliant with this standard and its supporting elements.

Element 12.1: Incorporation of the Institution: (CORE) A COM that is not affiliated with a parent institution must demonstrate incorporation as a non-profit or for-profit corporation with bylaws consistent with the COCA accreditation standards. The COM must have an autonomous appointed, functioning governing body **that is broad in representation of education, finance, legal, health policy, and osteopathic medical expertise. The governing board must be responsible for appointing the Chief Executive Officer.**

Element 12.2: Degree Offerings: A COM that is not affiliated with a parent institution must demonstrate evidence of approval to grant the Doctor of Osteopathic Medicine (DO) degree from all appropriate agencies.

Element 12.3: Chief Executive Officer: (CORE) A COM that is not affiliated with a parent institution must employ a Chief Executive Officer who is qualified by education, training, and experience to provide

effective leadership to the COM's administration, faculty, students, and staff. The Chief Executive Officer shall have a minimum of five years' experience in senior administration in an institution of higher education or healthcare setting.

Element 12.4: Chief Financial Officer: A COM that is not affiliated with a parent institution must employ a Chief Financial Officer who is qualified by education, training, and experience to provide organizational leadership related to the financial health of the institution. The Chief Financial Officer shall have a minimum of three years' experience in ~~senior~~ administration in financial management in an institution of higher education or healthcare setting.

Element 12.5: Title IV Responsibility: (CORE) A COM that is not affiliated with a parent institution must demonstrate compliance with all federal funding guidelines under Title IV of the Higher Education Act (HEA).

Element 12.6: Course Credit Hours: A COM that is not affiliated with a parent institution must publish and follow policies and procedures for the assignment of credit hours for all courses within the curriculum.