



AMERICAN OSTEOPATHIC ASSOCIATION

**Handbook of the
Program & Trainee Review Council (PTRC)**

American Osteopathic Association
Department of Education
Division of Postdoctoral Training
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HANDBOOK OF THE PROGRAM AND TRAINEE REVIEW COUNCIL

INTRODUCTION

The Handbook of the Program and Trainee Review Council (*Handbook*) is a procedural guide established for the use of the Program and Trainee Review Council (PTRC) and other AOA officers. This is an official document adopted by action of the AOA Board of Trustees (AOA Board). The *Handbook* includes a description of the purpose, function, structure, AND operating procedures of the council. The PTRC serves as a standing, subordinated council of the Council on Postdoctoral Training (COPT) in specified, selective areas of osteopathic graduate medical education (OGME).

The PTRC shall conduct itself according to the processes stated in this *Handbook* and shall review the *Handbook* every two years. Permanent Copies of the *Handbook* are on file filed at the American Osteopathic Association, Department of Education, 142 East Ontario Street, Chicago, Illinois 60611 and are posted to DO-Online

I. STATEMENT OF PURPOSE

A. Organization and History

The current structure and role of the PTRC was created by action of the AOA Board at its February 2003 meeting (see Resolution 53(M/2003, “Task Force to Study the Structure of the Department of Educational Affairs”) as a functional successor to the former ECCOPT. The PTRC is a representative body composed of members from AOA affiliate organizations created to assure the COPT, AOA Board, osteopathic medical professional and general public that postdoctoral training programs are operating within approved standards, rules and regulations, and provide educational training satisfactory to the public interest. The PTRC also has the obligation to deliberate and recommend policy revisions to the COPT, Bureau of Osteopathic Education (BOE) and the AOA Board for improvements in postdoctoral education.

B. Functions and Responsibilities

The primary responsibilities of the PTRC are to serve as the decision making body for AOA-approved internship, residency, fellowship and subspecialty training programs and for individual training approvals. In this capacity, actions of the PTRC are final. These actions may be appealed to the BOE Appeal Committee, decisions of which may be appealed to the AOA Board. The council also serves as an advisory body on policy to the COPT. The council shall:

1. Review and take final action on postdoctoral training programs, including consideration of program approvals, denials, and increases in approved positions,
2. Monitoring of compliance with corrective action procedures, or other programmatic violations of the *AOA Basic Document*.
 - a. Recommendations on internship programs are received from the Internship Evaluating Committee (IEC). Recommendations on residency and

fellowship training programs are received from the educational evaluating committees of the specialty practice affiliates.

3. Review and act on requests for approval of individual trainee's internship or residency training and make final actions.
4. Provide oversight for Site Review process.
5. Report its actions to the COPT for informational purposes.
6. Advise the COPT on policy development needs in OGME.

II. COUNCIL STRUCTURE AND GENERAL PROCEDURES

A. General Aspects of PTRC Membership

1. The PTRC has twelve (12) voting members as enumerated in Section II.C.
2. The PTRC has two (2) non-voting liaison members as enumerated in Section II.C with rights to review and debate matters before the PTRC without vote.
3. Appointment of representative and at-large members to the PTRC will be staggered and limited to no more than three consecutive three-year terms for nine (9) years cumulative. Membership and chairperson appointments would be limited to a maximum of nine consecutive years and six years respectively in any one bureau, council or committee.
4. All specialty college representatives shall be certified in the specialty they represent.
5. All specialty college representatives shall be members of their educational evaluating committees.
6. All osteopathic physicians on the PTRC must be members in good standing of the AOA and shall conform to its constitution, bylaws and code of ethics.
7. No member of the AOA Board, the BOE, or any other AOA education or accreditation bureau or council shall simultaneously hold a position on the PTRC.

B. Appointment of Officers and Terms of Office

1. Chair

The Chair will be appointed by the AOA President from among the membership of the PTRC for a two-year term of office. The Chair may serve a maximum of three (3) two-year terms within the limit of three three-year terms of membership.

Any voting member of the PTRC is eligible to be appointed to the position of Chair.

2. Vice-Chair

The Vice-Chair will be appointed by the AOA President from among the membership of the PTRC for a one-year term of office. Any voting member of the PTRC is eligible to be appointed to the position of Vice-Chair. The Vice-Chair may not be from the same specialty college as the Chair.

3. Secretary

Staff of the Division of Postdoctoral Training, as determined by the Director of the AOA Department of Education will serve as Secretary without vote. The Secretary shall be the administrator for the PTRC; shall be responsible for both recording and corresponding secretarial activities of the PTRC; and shall maintain technical expertise in the areas of responsibility of the PTRC and make the PTRC aware of trends in these areas.

C. Appointment of Members and Terms of Office

1. Permanent representation will be as follows for sixteen (16) council positions:

- 1 - Representative from within the Association of Osteopathic Directors and Medical Educators (AODME)
- 1 - Representative from the Association of Military Osteopathic Physicians and Surgeons (AMOPS)
- 1 - Representative OF the American College of Osteopathic Internists (ACOI)
- 1 - Representative OF the American College of Osteopathic Surgeons (ACOS)
- 1 - Representative OF the American Osteopathic Academy of Orthopedics (AOAO)
- 1 - Representative OF the American College of Osteopathic Family Physicians (ACOFP)
- 1 - Representative OF the American College of Osteopathic Obstetricians and Gynecologists (ACOOG)
- 1 - Representative OF the American College of Osteopathic Emergency Physicians (ACOEP)

- 1 – Representative of the American Academy of Osteopathy (AAO)
- 1 – Representative of the American Osteopathic College of Radiology (AOCR)
- 1 – Representative of the American Osteopathic College of Neurology and Psychiatry (ACONP)

- 1 – Representative of the American Osteopathic College of Ophthalmology and Otolaryngology – Head and Neck Surgery (AOCOO-HNS)
 - 1 – Representative of the American Osteopathic College of Anesthesiologists (AOCA)
 - 1 – Representative of the American Osteopathic College of Dermatology (AOCD)
 - 1 – Representative of the American College of Osteopathic Pediatricians (ACOP)
 - 1 – Representative of the American College of Osteopathic Physical Medicine and Rehabilitation (AOCPMR)
2. Non-voting liaison members will be appointed as follows with appointment terms lasting as long as they are serving as a Chair of the relevant BCC:
 - 1 - Liaison Member from the Council on Postdoctoral Training (COPT)
 - 1 - Liaison Member from the Bureau of Osteopathic Specialties (BOS)
 3. Each representative shall be appointed from a list of up to three (3) nominees submitted by the affiliate group to the AOA president-elect and the secretary will send a request for nominations to affiliates for each appointment cycle.
 4. Advisors
 - a. The AOA President, President-Elect, Executive Director, Chair or Vice Chair of the Department of Educational Affairs may meet with the PTRC as non-voting advisors on policies and procedures of the AOA as applicable to the PTRC.
 5. Observers
 - a. By precedent meetings of the PTRC are open meetings. Observers are asked to notify the Chair or Secretary of the PTRC of their intent to attend.
 - b. The presence of observers shall be acknowledged by the Chair and recorded in the PTRC minutes.

D. Meeting Structure of the PTRC

1. The PTRC will meet three times a year, in April and November according to the AOA council cluster and in July/August one-week prior to the summer council cluster. Meeting dates are published annually in the PTRC and BOE agendas and annually to the specialty affiliates.
2. The PTRC may as needed take action by mail ballot on the approval of the chair.

- a. There will be regularly scheduled mail ballots for trainee approval actions scheduled between meetings of the PTRC.
 - b. Mail ballots for program actions will be limited to exceptional need. No recommendation for denial or probationary approval will be conducted by mail ballot. The PTRC will consider Site Review reports and length of continuing approvals only at regularly scheduled meetings.
 - c. Mail ballot participation and approval will be governed by the same requirements for quorum and majority as in-person PTRC action, per Illinois statute.
3. Regular sessions will be open to all attendees to address issues of interest to all parties, including reports, discussion items, and information items.
 - a. The PTRC will utilize consent agendas for program and trainee resolutions.
 4. Accreditation sessions will be held for all program or trainee specific resolution items that require discussion. Attendance is open to anyone unless otherwise noted at the discretion of the PTRC. Items are extracted from the consent agenda as follows
 - a. Automatic extraction for: continuing approvals of less than 3 years, reconsiderations, all denials or other adverse actions;
 - b. Extraction at the request of any voting member of the PTRC;
 - c. Extraction at the request of the program or OPTI, or on recommendation of AOA staff, with rationale for the extraction and on approval of the chair or a majority of the council;
 - d. Extraction of all duty hour violation deficiencies.
 5. Pre-notification of specialty college recommendations will be given to programs, via their OPTI, no less than two weeks prior to the scheduled meeting date. The PTRC secretary will be notified of the intent to attend.
 - a. Programs may submit documentation, directly or via their OPTI, to address errors in fact only, and may attend the accreditation session for discussion and decision.
 - b. The OPTI for any program that has submitted an "error in fact" or contested item must either attend the PTRC meeting in person or be available for video conference during the PTRC meeting.
 6. Executive sessions are closed session to review issues that are of a sensitive or confidential nature. Program or specialty college representatives are invited to the executive session as needed for testimony, and will not be present for deliberations or final decisions.

E. Executive Committee

There shall be an Executive Committee consisting of the Chair, the Vice Chair and one other member appointed from the roster of permanent representatives.

1. Meetings of the Executive Committee will be called by the chair and may be held by teleconference.
2. The purpose of the Executive Committee is to act when meetings of the entire PTRC are not possible, and when needed to take timely actions, including:
 - a. Consideration of individual training issues
 - b. Consideration of disciplinary actions toward individual program or training institutions
 - c. Consideration of requests for an off cycle program review
 - d. Review of requests for reconsideration
 - e. Other business as deemed urgent and necessary by the chair
3. The secretary will take minutes and these will be reported to the full council.

F. Other Committees

The PTRC may approve working groups, or task forces, for special projects or assignments. Minutes or reports will be presented to the full PTRC.

G. General Procedures of the PTRC

1. The PTRC operates on Robert's Rules of Order, newly revised.
2. A simple majority of members will constitute a quorum sufficient for conduct of all business.
3. The PTRC operates within procedures approved by the AOA Board as appropriate. The PTRC will develop and maintain a procedural and policy handbook pertaining to that council's area of responsibility. Copies of these handbooks are provided to each member of the PTRC.
4. With respect to the areas for which the PTRC retains final decision authority, the PTRC may approve, deny, defer action or remand an item back to the entity submitting that item for the council's consideration.
5. The Chair or Vice-Chair of the PTRC will present the PTRC report to COPT, including resolutions for action.
6. The PTRC will conduct appropriate orientation activities for its members. The secretary will provide orientation materials to all newly appointed members according to AOA procedure.

7. The PTRC will be responsible for the expenses incurred by attendance only of such persons invited at the specific request of the Chair or Secretary where there is a written agreement for reimbursement.
8. The PTRC shall not be responsible for expenses incurred by persons appearing before the PTRC at the request of, or in the interest of, individual trainees or programs, or other organizations or individuals.
9. The Secretary to the PTRC shall attend all meetings, including the Executive Sessions.
10. All PTRC action letters for programs and individual trainees will cite the *Handbook* on policy and procedure, and will include information on access to the *Handbook*.
11. PTRC denial action letters will specifically include language referencing the appeal process.
12. In the absence of an appointed member of the PTRC, the affiliate organization, with the concurrence of the Chair, shall appoint an alternate representative to attend the PTRC meeting.

III. PROGRAM ACTION AND SITE REVIEW PROCEDURES

The PTRC shall review and take final action on all recommendations of the IEC and specialty affiliates including but not limited to approval of new programs, continuing approval of current programs and approval of program position increases. The AOA Division of Postdoctoral Training will send notification of PTRC actions to programs within 15 days of each meeting. Any extension of this deadline will require prior approval by PTRC.

A. Approval of New Programs

A new program may only be approved with inspection within one year of the date of commencement of trainees in the program.

B. Continuing Approval Program Actions

Continuing approval program actions of the PTRC shall indicate a specific number of years prior to mandatory resurvey as part of the motion, based on the COPT approved criteria.

1. Following the Site Review, the IEC or specialty college will file a recommendation for continuing approval for PTRC action. All programs achieving between 100-71% compliance based on the Basic Standards Crosswalks scoring shall be awarded a fixed 60 month accreditation. All programs at or below 70% shall be recommended for a 12 month probation status. Programs can also be recommended for 12 month probation status if they are found to have critical deficiencies that affect the quality of the program as determined by the specialty college.

2. Any new residency training program of three years, length or more, may have an onsite secondary review take place prior to completion of any trainee. This site review may take place at a median time between start of the first trainee and the anticipated time of the first trainee program complete status. Each Specialty College Evaluating Committee will determine what the secondary site visit will entail.
 (Examples: Three year programs would be inspected at one year and one year after the initial review
 Four year programs at 1 year and 1 1/2 years after the initial review
 Five year programs at 1 year and 2 years after the initial review
 Six year programs at 1 year and 2 1/2 years after the initial review
 Seven year programs at 1 year and 3 years after the initial review.)
3. Programs are required to undergo Site Review at the end of each approval period.
4. If Site Reviewers are reviewing programs at an institution, programs with no trainees shall be reviewed for continuing approval if the program had trainees in the past.
5. Deficiencies must reference specific standards and will be cited in the PTRC action letter.
6. Approval with re-review 12 months from the date of PTRC action will be considered a probationary approval. Ability to recruit must be specifically recommended.
7. Explanatory statements in SPEC recommendations are not included on PTRC action letters unless specifically directed by PTRC.

C. Probationary Approvals

Probationary approvals of one year, with or without the ability to recruit, shall reflect review and deliberation by the PTRC with explicit reasons for the probationary action.

1. This action is to be used for programs not in compliance with one or more major AOA standards which must be corrected. There is no ability to recruit under a probationary approval unless PTRC specifically allows recruitment.
2. Any program receiving a probationary action without the ability to recruit will be blocked from participating in ERAS unless a request for appeal is received at AOA and accepted.
3. Deficiencies must be satisfactorily corrected within 18 months of the citation date. Failure of the program to file a corrective action plan or to file evidence of implementation of corrective actions may result in immediate re-Site Review or denial of continuing approval.
4. Programs on probationary continuing approval are not eligible to apply for increases in positions.

5. Programs on probationary continuing approval for two consecutive terms shall be terminated effective June 30 of the second year. Any such terminated program may reapply for approval as a new program one year after the date of termination.

D. Denial Actions

PTRC action of denial indicates major deficiencies in the program recommended for action. Denial of approval of any agenda item shall reflect review and deliberation by the PTRC with explicit reasons for denial included as part of such actions.

1. Denial of continuing approval indicates that the program has violated one or more major requirements making it necessary to terminate the existing program. Denial actions may be taken for programs on probationary approval that have not filed corrective actions.
2. Denial of new program approval indicates the presence of deficiencies identified in a pre-approval Site Review or in materials submitted in the application process. Denial may be taken where letters of negative impact from AOA-accredited sponsors in the market area have been filed with the specialty college or the AOA.
3. Denial of increase applications indicates the program does not have the financial or education resources, including scope, volume and variety, to support additional trainees.

E. Types of Site Reviews

Programs will participate in a full program site review within the term proscribed by the PTRC, which will also have authority to require additional reviews (with or without recommendation of the specialty college).

1. Pre-approval site review
The IEC or specialty college may require a pre- approval site review at their discretion prior to making a recommendation for action to the PTRC. Such site reviews do not require PTRC approval but AOA Site Reviewer staff must be allowed to have authority over the site review. A Site Review must be requested by the SPEC no later than 40 days after receipt of the application.
2. Focused Site Review
When a program is deficient in an area that requires a site visit to verify correction of deficiencies prior to the program's next regularly scheduled site review, a focused site review may be required. Notice of a focused site review will include areas of concern or deficiencies to be addressed. Focused site reviews will not be considered as full site reviews.

- a. Filing of a corrective action plan and/or evidence of implementation of the action plan can result in a specialty college recommendation for waiver of the focused site review.

3. Mandatory consult

When a program has deficiencies indicating program development issues or where deficiencies indicate outside assistance would be helpful, a mandatory consultation may be required. A consult may also be required for new programs where no pre-approval site review has been conducted. A mandatory consult will not be considered as a full site review.

- a. Any program or training institution may make a request for a consultation to the AOA or the specialty college. Such requests are voluntary and do not require PTRC approval.

4. Off- cycle site review

Off-cycle site review may be called for by the PTRC outside of the schedule required in the most recent PTRC approval according to the off-cycle site review protocol (see appendix a). Off-cycle site review may be focused site visits, mandatory consultations or full site reviews.

5. Site Review Reports

- a. Reports from AOA Professional Reviewers will be due at the AOA within 15 days of the site review or within 15 days of the last site review where an AOA Professional Reviewer is reviewing multiple programs.
- b. AOA professional reviewer(s) may request additional documents or information be submitted with the report to support the work of the team.
- c. The AOA professional reviewer report shall be forwarded from the AOA to the OPTI for review and comment by AOA immediately upon receipt.
- d. The OPTI shall have fifteen (15) business days to respond to the report. The OPTI may request correction of factual errors noted by the AOA professional reviewer(s).
- e. Within 15 days, each OPTI shall respond to the data, either affirming the data or providing other data.
- f. The AOA professional reviewers final site visit report shall include the OPTI's comments and shall be forwarded together to the spec for review.

6. Institutional Site Review

The PTRC and COPT require an institutional review to be completed at the same time that a residency Site Review is set to occur if the institution is also due for an institutional review.

- a. Institutional site reviews will be conducted by AOA Professional Reviewers. The IIEC will submit a resolution to the PTRC detailing any deficiencies and recommendation.

- b. Institutions must achieve a score of 80% or greater in order to be awarded a five year approval for their Institutional Review. If less than 80% they have a year to correct the deficiency or will lose approval. If any section of the Crosswalk receives zero points, they do not pass the Institutional Review.

7. REVIEW OF TEACHING HEALTH CENTERS

Ambulatory and continuity clinic requirements in the primary care specialties in AOA programs which are HHS grant funded THC or rural programs are permitted to be interpreted and reviewed consistent with the requirements and intent of the HHS, THC grant programs.

IV. TRAINEE APPROVAL PROCEDURES

A. Federal and ACGME PGY-I

Approval indicates that the intern has successfully completed a PGY-1 YEAR which meets the criteria required for the equivalent of a rotating internship as stated in Section V of the Basic Document for Postdoctoral Training. Rotations will be compared to the Traditional Rotating Internship or the AOA's OGME-1 specialty.

- 1. COM graduates who participate in ACGME-accredited required military program will be reviewed by the Association of Military Osteopathic Physicians and Surgeons (AMOPS), with credits reported to the PTRC.

B. Residency/ACGME Training

Applications for AOA recognition of ACGME residency training is reviewed by AOA Trainee Services staff in the Division of Postdoctoral Training.

V. AGENDA PREPARATION AND PROCEDURE

- A. Specialty college evaluating committees (SPEC) shall hold their evaluating committee meetings at least 45 days prior to published PTRC meeting dates so that reports are received by the Division of Postdoctoral Training at least forty (40) days prior to the scheduled PTRC meetings.

- 1. Specialty affiliate evaluating committees (SPEC) will meet in person or by teleconference three (3) times a year, generally in February, May and September.

- B. SPEC reports to the PTRC on Continuing Approvals/site review will follow the schedule below wherever possible:

- 1. February - April site reviews will be reviewed at the May SPEC and reported to PTRC for the July meeting.

2. May - August site reviews will be reviewed at the September SPEC and reported to the PTRC for the November meeting.
 3. September - January site reviews will be reviewed at the February SPEC and reported to the PTRC for the April meeting.
- C. The SPEC will review the new program application and submit an approval or denial resolution to PTRC. If the new program is also part of a new institution the IIEC or IIEC Chair will review the new institution worksheet and also provide an approval or denial resolution on the new institution simultaneously with the SPEC program resolution. SPEC reports to the PTRC on New Program Approvals will follow the schedule below wherever possible:
1. When pre-approval site reviews are NOT conducted all applications received at the AOA 40 days prior to the published SPEC meeting date must be reviewed by the SPEC and sent forward to the PTRC for its approval or disapproval at its next meeting.
 2. When pre-approval site reviews are required The SPEC will have 40 days from the date of receipt of the application to decide whether the application merits a pre-approval site review. If not, notification will be made to the AOA then the program and OPTI.
 3. If the application merits site review, then the site review date will be set within the next 60 days. After the site review, the SPEC must review the application and site review report for decision at their next required SPEC meeting.
 4. The application deadlines for new programs are as follows (Noted times are minimums; SPECs may act prior to those deadlines):

No pre-approval site review:

- PTRC April, SPEC mid-February - application deadline mid-January
- PTRC July, SPEC mid-June - application deadline mid-May
- PTRC November, SPEC mid-September - application deadline mid-August

Pre-approval site review:

- PTRC April, SPEC mid-February - application deadline mid-November
- PTRC July, SPEC mid-June - application deadline mid-march
- PTRC November, SPEC mid-September - application deadline mid-June.

When the SPEC must defer recommendation on a program action, the SPEC will report the delay to the AOA Division of Postdoctoral Training with the expected date of report.

- E. Specialty colleges shall submit official resolutions to the AOA Division of Postdoctoral Training following the directives of the *Guidelines for Submitting Resolutions for the Program and Trainee Review Council (PTRC) and the Council on Postdoctoral Training (COPT)*

1. When the specialty college does not follow guidelines or use the template forms provided, the PTRC secretary may return those resolutions to the specialty college for correction or for submission to the next regularly scheduled meeting of the PTRC.
2. Guidelines will be updated no more than annually prior to the fall meeting of the PTRC, and will be published to osteopathic.org and transmitted to the spec electronically.

Electronic submissions are required. E-mail resolutions will require prior approval.

- F. All agenda items received after the published submission deadline that time shall be reviewed by the PTRC as appropriate at their next scheduled meeting. Only the Chairman and/or Secretary may authorize exceptions to the above.
- G. Distribution of Agendas
1. The Secretary will send an advanced copy of the agenda to members (voting and non-voting) for review approximately two weeks prior to the PTRC meeting date. This advanced agenda shall contain minutes of previous committee meetings, reports, policy items and issues requiring advanced review, as determined by the Chair.
 2. Copies of the PTRC agenda distributed to the specialty affiliates and guests will be appropriately abridged for purposes of confidentiality and will be distributed electronically.
 3. If a specialty affiliate has business before the PTRC a representative of the specialty affiliate should be present or available by phone.

VI. RECONSIDERATION AND APPEAL OF DECISIONS

As PTRC actions are final, programs or individual trainees may request that PTRC reconsider such action under the following circumstances and without filing a formal appeal. The chair will be notified of all requests for reconsideration upon receipt at AOA. A request for reconsideration will not result in a stay of the PTRC action.

- A. A request for reconsideration must be based only on Errors in Fact. Questions regarding fairness of application of standards or policy require an application to the BOE Appeals Committee (see 2 below)
- B. If an individual trainee believes that an action taken is due to inaccurate information (Errors in Fact) and said physician wishes to have the action reconsidered, a written request must be filed with the AOA Division Of Postdoctoral Training describing the basis for reconsideration and documenting the changes or discrepancies between reported deficiencies and fact. This request must be received within forty (40) days of the date of the letter of notification.

- C. Programs have the opportunity to provide error in fact documentation before specialty college evaluating committee review and before PTRC action. Programs may not file for reconsiderations. Programs may appeal to the Bureau of Osteopathic Education Appeal Committee.
- D. If after Site Review a continuing program receives a recommendation of approval with re-Site Review within one year, with or without the ability to recruit, the program may request a reconsideration by the PTRC with documentation to refute the reasons for the probationary action. This request must be received within forty (40) days of the date of the letter of notification.
- E. Upon receipt of the written request from an individual trainee, the Division of Postdoctoral Training shall forward this documentation to the Executive Committee of the PTRC for input. This input shall then be reported to the full PTRC
- F. Upon receipt of a written request for reconsideration on a program action staff will forward a copy of the request to the specialty affiliate evaluating committee for review with a report to the chair within thirty (30) days.
 - 1. Upon receipt of the report the PTRC chair may call a meeting of the executive committee or refer the reconsideration to the next regularly scheduled meeting of the PTRC.
- G. All actions on reconsiderations shall be reported to the full PTRC in the Secretary's Report for the next regularly scheduled meeting.
- H. Formal appeal of PTRC action
 - 1. Any action of the PTRC may be appealed to the BOE Appeal Committee. Notifications of PTRC actions from the AOA will include appeal procedures for all denials and for all probationary actions.
 - 2. A request for an appeal shall be made in writing within thirty (30) days of receipt of the letter of notification and must state the basis for the appeal according to the process outlined in the *Handbook of the Bureau of Osteopathic Education (BOE), Appendices A and B*.
 - 3. If an appeal is granted, the BOE Appeal Committee shall schedule a hearing at its next meeting in accordance with its appeal protocol.

VII. CONFLICT OF INTEREST POLICY

The following is an adaptation of a conflict of interest policy adopted by the AOA Board in October 1997 for the then Bureau of Professional Education.

This policy statement governs matters of conflicts of interest and appearances of impropriety as they may occur in the respective evaluations, deliberations, recommendations, and actions of the BOE and its subordinated Councils. These policies are applicable to members of the AOA Board, the BOE and its subordinated councils, and also to members of the administrative staff, appeals panels and evaluation teams, and to consultants.

It is intended that these policies establish a mechanism whereby all individuals make known situations of clear conflict and also those that may give rise to the appearance of impropriety. The goal is to make sure that discussions and actions are participated in only by those who have no conflict and, to the extent possible, that such discussions and actions avoid the appearance of conflicts.

It is stated that elected officers and trustees of the AOA cannot serve on the Bureau and Council. However, there is the further question of whether such individuals should be free to participate in discussions of matters such as accreditation. As an accreditation agency recognized by the U.S. Secretary of Education for both institutional and programmatic purposes, the AOA Bureau must exclude members of the AOA Board of Trustees from decision making in both of the areas of accreditation action and accreditation policy of colleges of osteopathic medicine.

The chair of the PTRC will be able to direct an AOA board member to exclude himself/herself from specific discussions in which a conflict may exist. If there is any question of undue influence arising from anything but purely disinterested motives, then discussion should simply be limited to members of the respective bodies.

Matters such as decisions on accreditation status of an AOA-Approved Postdoctoral Training Program and the particular findings leading to such status can have an enormous impact on institutions, so there should be no reluctance to employ executive session whenever a chair feels that discussion may involve sensitive matters. Executive sessions of the AOA, BOE, PTRC shall be limited to voting members of the PTRC, the AOA Executive Director, Secretary to the Bureau Council, and by invitation, to those participants deemed appropriate to the discussion.

Individuals asked to serve on the PTRC and its councils and other bodies will honestly examine their individual circumstances and determine whether they can render fair and unbiased service in general. Before the body sits down to serve, all of the members must have gone through this self-examination. This is also true for staff and team and panel members. Full disclosure of any doubtful situation to the other members of the body must be made. This is particularly true of situations where the individual may honestly feel that he or she can be fair, but the situation gives rise to, or may give rise to, an appearance of impropriety.

The decision to withdraw from discussions and/or not to vote should initially come from the individual, but the final decision must come from the chair or the majority of the other members. If the chair rules, such ruling should be subject to a call for a vote by other members. The chair may feel that he or she should not substitute his or her judgment for that of a majority and may want to call for a vote at the outset. It may be that one member may bring to the attention of the body a possible conflict situation involving another member. Needless to say, this can give rise to a certain amount of acrimony in some cases. Consequently, each member should keep in mind that he or she should disclose his own possible conflict, so as not to put

that sort of burden on a fellow member. It may be that the very presence of a member with a conflict would inhibit the discussions and actions of a body, so it is not unwarranted to ask a member to absent himself or herself from the deliberations in some circumstances. In some cases it may not be clear as to what particular body should be informed and make rulings. In case of doubt, matters should be brought to the Bureau.

It is often difficult to define matters involving conflicts. Clearly, a financial interest creates a conflict. However, some financial interests are indirect and it is here that a member must search his or her conscience, because such interest may not appear to the others. Anyone serving on a board or committee brings to the body the sum total of his or her experience and personal opinions. The key question is whether a particular opinion or belief can stand in the way of rendering a fair and unbiased discussion or decision based on the facts and the rules. This may be a highly subjective determination and it underscores that individuals should be required to make disclosure to the other members whenever there is a question.

In the accreditation area, examples of situations, which may or may not create conflicts are:

1. Being an alumnus or alumna of an OPTI under consideration;
2. Being an employee or board member of the OPTI (this would most likely create a conflict)
3. Being involved with a competitor of the OPTI (competition is often difficult to ascertain -- there is a question of direct or remote competition);
4. Having a family or business relationship with others affiliated with the OPTI under consideration.

This is not an inclusive list, but is intended to give some guidance.

It should be kept in mind that the integrity of the respective body is always at risk, so that each member should be constantly aware of creating an appearance of improper conduct even where there may not be such in fact. Connections with affected individuals and institutions cannot always be avoided. Such connections often bring a measure of experience and expertise to the process. However, when such connections exist, it is prudent to err on the side of greater caution and make full disclosure.

Appendix 1: Off-Cycle Site Review Procedure for Osteopathic Internship and Residency Programs

Postdoctoral training programs are inspected in cycles driven by PTRC-granted approval as described in the AOA Basic Document (Sec. VIII, C). The PTRC has the authority to call for inspections outside of this cycle when it is necessary to preserve the quality of training for an individual program or training institution, and may also consider requests for off-cycle site visits by a specialty college, OPTI or other stakeholder in the training of osteopathic physicians.

Requests for an off-cycle site review shall be submitted to the chair of the PTRC with supporting documentation from any of the following sources:

- DME, Program Director and or the attending of the program for which a site review is requested;
- Administrator of the OPTI partner of the training program institution;
- Administrator, faculty or other staff in a leadership position employed by an OPTI partner College of Osteopathic Medicine;
- Specialty College of the specialty associated with the program to be reviewed;
- Two or more trainees at the program to be reviewed.

Care shall be taken that requests for off-cycle site reviews will be based on verifiable data, and will not be based on unsupported narrative or verbal reports. The Chair will notify the OPTI and/or Specialty College at appropriate points in process, and when any intervention is required. AOA staff will maintain a file for documentation and will support the PTRC or OPTI in implementation of investigation of complaints or corrective actions.

If after document review the Chair of the PTRC determines that documentation shows sufficient evidence that deficiencies exist that threaten the completion of the training program in compliance with the Basic Document or Basic Standards, the Chair may take any of the following actions. The intent of the action will be to investigate and assist the program in resolving an existing problem as needed, while also reserving the authority to call an Site Review where required. The Chair may:

- Request an investigation by the OPTI with a written report to the chair of the PTRC within thirty (30) days;
- Request additional information from the program, the Specialty College, the OPTI, or other appropriate bodies;
- Notify the program director or DME that documentation has been presented that the program is in violation of the AOA Basic Document and/or Basic Standards of the specialty and request an interim report within ten (10) days and a final report within thirty (30) days;
- Refer the request for an off-cycle site review to the Executive Committee or full membership of the PTRC for consideration and consultation within 10 days.

In the event that the above actions do not answer the concerns addressed to the PTRC, or that documentation clearly supports the need for an on-site inspection, the PTRC will notify the program by certified mail that an off-cycle site review is called for cause and is to take place within sixty (60) days, or sooner for egregious cause. Authorization of any off-cycle Site Review will also require immediate notification to the Specialty College and the OPTI, with a report to the COPT and COPTI no later than their next scheduled meeting.