

# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

## *Handbook*



**AMERICAN OSTEOPATHIC ASSOCIATION**

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## **COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION TABLE OF CONTENTS**

Introduction-----	3
Statement of Purpose-----	3
COCA Responsibilities-----	3
COCA Membership-----	3
COCA Voting Members-----	4
Chair-----	5
Duties of the Chair-----	5
Vice Chair-----	5
Duties of the Vice-Chair-----	5
Accreditation Coordinator-----	5
Advisors-----	6
Observers-----	6
COCA Operating Procedures-----	6
Meetings-----	6
COCA Actions-----	6
Executive Session-----	7
On-Site Visit Process-----	7
Self-Study Review-----	7
Progress Report Review-----	7
Annual Report Review-----	7
Registry of Evaluators of Colleges of Osteopathic Medicine-----	8
Consultants on College Accreditation List-----	8
COCA Committees-----	8
Executive Committee-----	8
Committee on College Accreditation Training-----	9
CCAT Activities-----	9
CCAT Membership-----	9
Annual Report Review Committee-----	9
Conflict of Interest-----	10
Glossary-----	15
Appendices-available upon request-----	16
Chart 1: The United States Department of Education and the COCA and its Committees-----	17

## COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION *HANDBOOK*

### **Introduction**

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

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

### **Statement of Purpose**

The COCA is a representative body of both the osteopathic profession and the public. The COCA acts to assure the AOA Board of Trustees and the public that its accreditation actions of the colleges of osteopathic medicine are within the framework of the *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures* and the public interest.

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

### **COCA Responsibilities**

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

### **COCA Membership**

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

The COCA will conduct, at its fall meeting, an hour-long orientation and information program for all new members.

The COCA will have one non-voting secretary and one non-voting assistant secretary. AOA Department of Accreditation staff will serve in these positions.

### *COCA Voting Members*

COCA voting members are appointed by the AOA president and include the following:

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

Public college dean  
(Chief Academic Officer)                      One position; three year term. Must be a dean from one of the six public colleges of osteopathic medicine.

Private college dean  
(Chief Academic Officer)                      One position; three year term. Must be a dean from one of the 14 private colleges of osteopathic medicine.

Educators from the colleges of  
osteopathic medicine                      Two positions; staggered three year terms. Educators from the 20 colleges of medicine, but who is not the dean of the college of osteopathic medicine. However, educators may hold other academic administrative positions including associate dean, assistant dean, department chair, course director, course coordinator or other similar positions.

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

Hospital Administrator                      One position; three year term. Must be from a hospital approved by the AOA Health Care Facility Accreditation Program (HFAP).

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

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

### **Chair & Vice-Chair**

#### *Chair*

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

#### Duties of the Chair

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

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

#### *Vice-Chair*

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

#### Duties of the Vice-Chair

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

#### *Accreditation Coordinator*

This position will be appointed from within the voting membership, for a one-year term, but will not be the COCA chair or vice-chair. The COCA will provide three nominees, in rank order, to the AOA president for his/her consideration. The accreditation coordinator will work with the assistant secretary to schedule accreditation on-site visits, approve team members, and will approve COCA reviewers for self-study, progress reports, and annual report review activity.

### *Advisors*

The AOA president, president-elect, executive director, associate executive director, Department of Educational Affairs chair and vice-chair and the AOA General Counsel meet with the COCA as non-voting advisors on policies and procedures of the AOA as applicable to the COCA. As non-voting advisors they do not participate in the vote on individual college of osteopathic medicine accreditation actions. Advisors do not participate in executive sessions of the COCA that deal with college of osteopathic medicine accreditation actions, with the exception of the AOA General Counsel; advisors will absent themselves from the proceedings during the period that such actions or votes are under consideration by the COCA.

### *Observers*

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

## **COCA Operating Procedures**

### *Meetings*

The COCA holds three regularly scheduled meetings per year, ordinarily occurring on the weekends in late April, late August, and early December. All meetings, together with their topical agendas, are announced on the COCA website currently at <http://www.do-online.org>.

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

A simple majority of commission members will constitute a quorum, which is nine individuals.

The COCA operates on *Robert's Rules of Order*, newly revised, 10<sup>th</sup> edition.

### *COCA Actions*

The COCA will act to approve or deny accreditation within policies and procedures adopted in the *Accreditation of Colleges of Osteopathic Medicine: College Accreditation Standards and Procedures*. The COCA may defer, to a specific time, a decision and request additional information before making an accreditation decision. If such action is taken, this in no way jeopardizes or prejudices the college's current accreditation standing. The COCA may meet with individual colleges of osteopathic medicine personnel, the AACOM, or others, as appropriate.

The COCA and/or its Executive Committee will have authority to direct a COM or other entity under its jurisdiction to respond to an issue with a “Show Cause” letter. The Show Cause letter would be issued in circumstances where information that a COM may be out of compliance with an accreditation standard, procedure or requirement issued by the COCA appears to be accurate. The Show Cause letter will advise the COM or other entity of the alleged non-compliance and allow the COM or other entity an opportunity to appear at the next COCA meeting in order to present the COCA with factual and/or legal reasons why it should not be found to be out of compliance with an accreditation standard, procedure or requirement issued by the COCA. The Show Cause letter, if issued at the instruction of the Executive Committee, will be circulated to the entire COCA membership before or at the same time it is issued to the COM or other entity.

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

#### *Executive Session*

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

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

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

#### *Self-Study Review*

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

## **Progress Report Review**

Progress reports will be reviewed by two COCA members. These reviewers will provide the rationale for their findings utilizing the Progress Report Review Form. See Appendix B for the progress report review procedures.

## **Annual Report Review**

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

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

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

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

## **Consultants On College Accreditation List**

The COCA assists COMs in identifying potential consultants on college accreditation. The composition of the list of consultants on college accreditation will be reviewed and approved annually by the COCA.

## **COCA Committees**

### *Executive Committee*

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

The Executive Committee will provide the following:

- Review of COCA accreditation documents and its *Handbook*, with recommendation to the COCA for consideration of areas for revision
- Technical review of substantive change applications

- Technical review of applications for new COMs
- Technical review of branch campus applications
- Authorize focused visitations based upon information obtained between regularly scheduled meetings
- Standards interpretation
- Assist the AOA staff in COCA communication and participation.

Because the COCA functions in the interest of all stakeholders, including internal and external publics, decisions pertaining to an accreditation status – preaccreditation, provisional accreditation, accreditation – and decisions pertaining to approval of a substantive change request will ordinarily be made by the full COCA at a regularly scheduled meeting. The only exception to this will be that the COCA reserves the right to make such decisions in a special meeting by teleconference when those decisions are prompted by an action taken by a regional accrediting agency to place the COM's parent institution on probation, withdraw accreditation, or deny accreditation.

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

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

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

#### CCAT Activities

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

#### CCAT Membership

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

#### *Annual Report Review Committee*

This committee meets minimally at least on an annual basis, via teleconference, to review the tabular data collection form and the questions in the Annual Supplemental Report. Three COCA members serve on this committee. The COCA chair serves as ex-officio.

## **Conflict of Interest Policy**

### *Introduction*

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

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

### *Principles of Conflict of Interest*

#### What is a Conflict of Interest?

A conflict of interest arises where an individual on the COCA, COCA staff, members of the Evaluators Registry participating as site visit team members, or consultants, due to a financial, personal or other relationship with an entity under consideration, or an expression of bias / prejudice, may be unable to act based solely on an objective analysis of the information presented. From a legal perspective, the presence, or even the perceived presence, of conflict of interest suggests that the conflicted individual may not have acted consistent with the legal duties of loyalty and/or obedience. This, in turn, raises the question of whether the COCA's discussion and eventual decision were influenced by factors other than the information presented to the COCA. For example, bias may be present from consideration of information that is not entered into the record, but is known only to one or more members of the decision making body. More seriously, prejudice, a literal pre-judgment in advance of the proceeding itself, may have occurred with one or more members of the decision making body. Although courts typically

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<sup>1</sup> The duty of loyalty requires that an individual acting in the name of a corporate body will act with that organization's best interests in mind. For example, several members of a bureau, council or committee may also be officers or members of another organization or entity. In satisfying the duty of loyalty, those individuals would be expected to take actions based upon the best interest of the AOA's COCA rather than what might be the best interest of the particular organization of which he is also a member.

<sup>2</sup> The duty of obedience requires that an individual acting in the name of a corporate body will adhere to the standards, policies and procedures of that organization. Although individuals are expected to use good judgment when making decisions on behalf of a corporate body, they are expected to apply that judgment with respect to existing standards, policies and procedures of the corporate body. In making decisions that demonstrate duty of obedience, an individual will know, understand, consider, and follow the standards, policies and procedures appropriate to the matter to be decided.

grant considerable deference to the professional judgment used to reach substantive decisions made by private accrediting and certifying agencies, the presence of bias and/or prejudice or the failure to follow the defined procedures for handling conflicts of interest may provide the basis for overturning the decision of the accrediting or certifying body.

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

Unfortunately, there is no agreed upon taxonomy of conflict of interest. In simplest terms, a conflict of interest arises where an individual member of a bureau, council or committee may be influenced in her or his decision-making process due to a relationship with an individual or entity under consideration. Some examples of situations that could create conflicts of interest:

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

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

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

Disclosure represents the first step in addressing conflicts of interest.

1. The primary responsibility for disclosure of what may or may not be a conflict of interest rests with the members of the COCA. Beginning in July 2005, COCA staff will distribute a conflict of interest statement, similar to that currently used by AOA Board of Trustees, to all COCA members and members of the Evaluators Registry. Thereafter, COCA members will be asked to disclose potential conflicts of interest at the time the agenda is finalized in the beginning of each COCA meeting. Such disclosure may be made by the member directly or about another member. In the latter case, the member accused of a conflict of interest will have the opportunity to respond to that assertion.
2. A secondary responsibility rests with the COCA staff, to review the curricula vita and disclosure statements of the members and make potential conflicts known to the Chair prior to the meeting. COCA staff also has the responsibility to disclose stated conflicts of members of the Evaluators Registry to the Accreditation Coordinator when assembling teams who will conduct on-site evaluations.

3. Finally, the individuals and programs that have issues before the COCA will have the opportunity to present any concerns they may have with respect to conflicts of interest of the voting members either in advance of the meeting or at the meeting. With respect to composition of the on-site evaluators, the COM being visited will have the opportunity to reject a proposed evaluator whom it believes may have a conflict of interest with that COM.
4. Because these conflict of interest policies apply to staff of the COCA and its consultants, each of these groups will also fill out the conflict disclosure form. With respect to composition of staff for an on-site evaluation, or recommendation of a consultant to a COM, the affected COM will have the opportunity to reject a proposed staff member or consultant whom it believes may have a conflict of interest with that COM.

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

#### How are Conflicts of Interest Brought to Resolution before the COCA assembled?

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

In general, the level of resolution selected should be appropriate to the perceived degree of conflict. However, as noted above, the COCA should err on the side of precaution to avoid an appearance of impropriety. The three levels described below, represent attempts to clarify points in what is truly a continuum. Accordingly, just as it is not possible to list all conflicts, it is not possible to offer a complete listing of resolutions.

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<sup>3</sup> The AOA COCA operates under the most recent version of *Robert's Rules of Order, Newly Revised, Tenth Edition* (2000). The duties of the presiding officer are described in Chapter XV § 47. Officers, beginning at page 433.ff. and, **with respect to resolution of conflicts of interest**, include: (3) To recognize members who are entitled to the floor; (6) To enforce the rules relating to debate and those relating to order and decorum within the assembly; (8) To decide all questions of order, subject to appeal – unless, when in doubt, the presiding officer prefers initially to submit such a question to the assembly for decision. As described in Chapter VIII§ 23. Point of Order, when a member of the assembly believes the rules of the assembly are being violated, a point of order question may be raised. These duties provide the COCA Chair, or whoever else may be presiding at the time, with the authority to determine and take appropriate action regarding conflicts of action.

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

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

Selection of the level of resolution, i.e. progression from (a) to (b) to (c), must be determined based upon consideration of each instance of conflict of interest. Although it is not possible to offer a "cook book" approach that identifies every situation that may arise and the appropriate response to that situation, the following examples from current practice of the COCA collectively provide an empirical approach:

- ❑ Level (c) should be used when a COCA member is employed by or otherwise has a current affiliation with the COM involved in the matter under discussion.
- ❑ Level (c) should be used when the COCA is discussing a policy change, and the substance of the discussion could give a COCA member employed by or currently affiliated with a COM "insider" information that could offer a commercial advantage for that COM.
- ❑ Level (b) should be used when a COCA member is not able to limit his or her discussion to the findings presented before the COCA in its official record because s/he has material knowledge, beyond that in the official record, of the COM under discussion.
- ❑ Level (a) or (b) may be used when a COCA member's conflict is significant bias, sufficient to cause a prejudiced decision.
- ❑ The level of resolution should be great enough to allow the COCA to believe that it will be able to hear testimony, discuss and deliberate, and vote on the matter in question, free of bias and prejudice.

### How are Conflicts of Interest Brought to Resolution outside of the COCA assembled?

In general, it is preferable to resolve conflicts of interest at the meetings of the COCA assembled. This venue provides for discussion, and also for appeal of a decision of the COCA Chair or presiding officer to the entire COCA. However, because of their nature, some potential conflicts of interest require disclosure and resolution outside of or prior to a COCA meeting. As with the discussion of resolution of conflicts of interest by the COCA assembled (see immediately above), it is also not possible to offer a “cook book” approach, the following examples from current practice of the COCA collectively provide an empirical approach:

- ❑ In the previous section entitled, “What are the Elements of Disclosure of Conflicts”, numbered items 3 and 4 provide for a COM undergoing a site visit to reject participation by a member of the Evaluators Registry or by a member of the COCA staff.
- ❑ Matters may arise during the conduct of a site visit that, in the opinion of the COM being questioned, become a potential conflict of interest. In such cases, resolution by the site visit team, in consultation with the COCA staff and its general counsel if needed, will follow the same approach suggested for the COCA assembled (see immediately above). For example, the analogy to resolution level (c) would be that a team member withdraw from participation in a particular visit.

## Glossary

**External public** – In addition to public constituencies within the osteopathic profession, there are also "external publics" who by virtue of their relationship with an osteopathic physician or the osteopathic medical community have the perspective of someone outside the profession looking in. Examples of external publics would include: Employers of osteopathic physicians; federal, state, and municipal governments; media; public interest groups with healthcare missions; potential applicants to osteopathic medical colleges; parents of potential applicants to osteopathic medical colleges; and patients of osteopathic physicians.

**Public Member** – In order to qualify as a public member, the individual must comply with the US Department of Education regulation, §602.3:

*Representative of the public means a person who is not—(1) An employee, member of the governing board, owner, or shareholder of, or consultant to, an institution or program that either is accredited or preaccredited by the agency or has applied for accreditation or preaccreditation; (2) A member of any trade association or membership organization related to, affiliated with, or associated with the agency; or (3) A spouse, parent, child, or sibling of an individual identified in paragraph (1) or (2) of this definition.*

**Public Service** – An individual who has served on the boards of nonprofit organizations or has served in an elected position at the municipal government, state, or federal level.

## **Appendices**

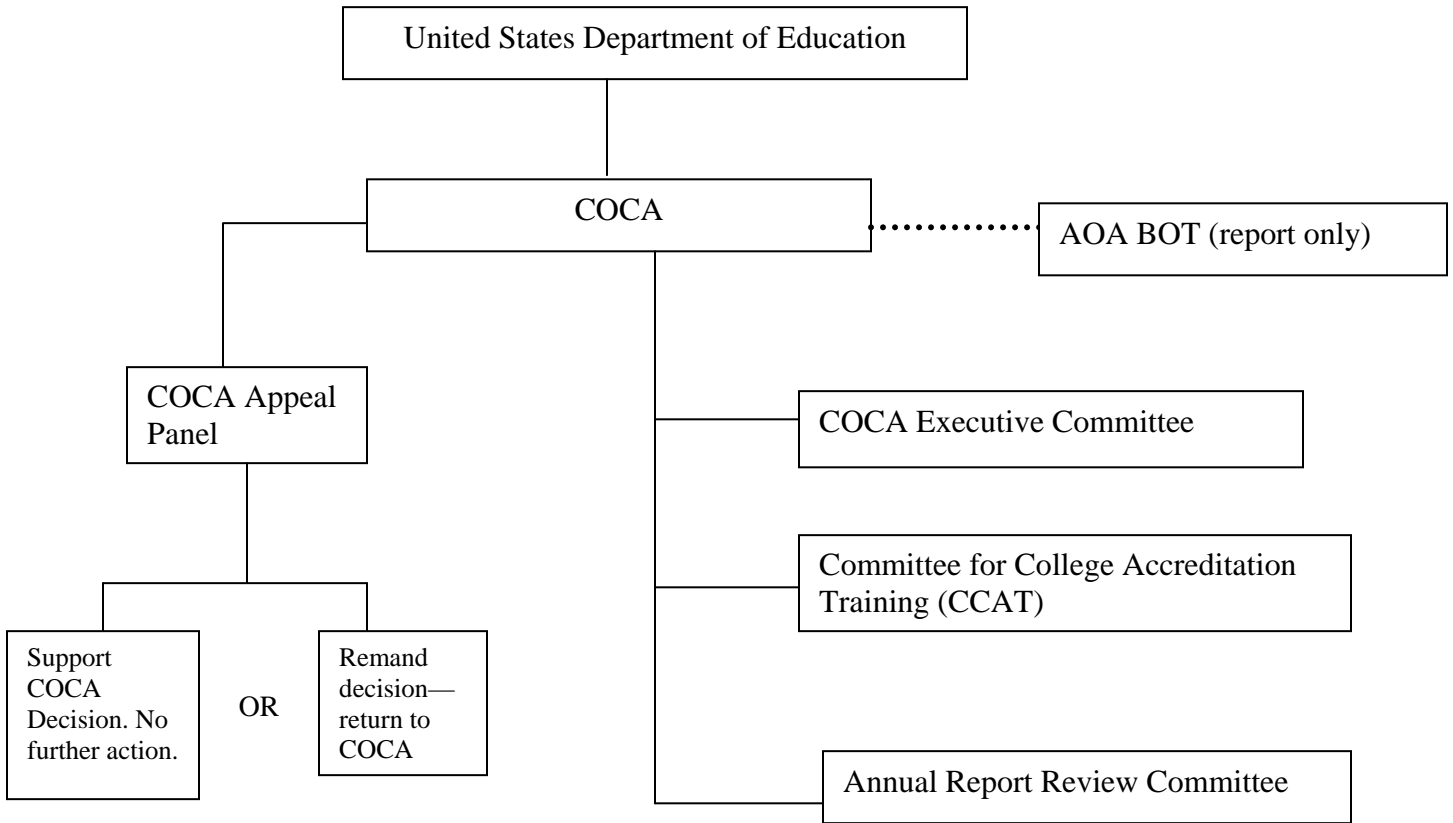
Appendix A. Self-Study Analysis Tool

Appendix B. Progress Report Review Procedure

Appendix C. Annual Report Review Procedure

Appendix D. AOA/COCA Memorandum of Understanding

Chart 1: The United States Department of Education and the COCA and its Committees



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# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

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## SELF-STUDY ANALYSIS TOOL

COM NAME: \_\_\_\_\_

REVIEWER NAME: \_\_\_\_\_

*Feel free to address any additional questions or comments to the Team Chair during regularly scheduled COCA meetings.*

**Standard One:     Mission, Goals, & Objectives**

Compliance with Mission, Goals, and Objectives refers to the COM developing and integrating its mission, goals, and objectives into all aspects of operational and administrative activities. In effect, a COM must connect its learning outcomes assessment to its mission plans and objectives; incorporate formative and summative reviews of student achievement in its strategic planning; contribute to the advancement of knowledge through research; serve as a community advocate; and address the development and planning of appropriate affiliations for the best possible predoctoral clinical experiences.

Does the COM Self-Study adequately address the above statement regarding Mission and Objectives?

Yes     No

Comments:



**Standard Two: Governance, Administration, & Finance**

Compliance with Standards for Governance, Administration, and Finance refers to the COM and/or its parent institution having the organizational, administrative, and financial resources necessary to accomplish its academic mission and objectives. Additionally, the COM and/or its parent institution must develop and implement bylaws that clearly define the governance and organizational structure and must have financial resources and reserves to fulfill its mission and objectives. The Chief Academic Officer and senior administrative leadership must demonstrate relevant training and experience.

Does the COM Self-Study adequately address the above statement regarding Governance, Administration, & Finance?

Yes     No

Comments:

**Standard Three: Facilities, Equipment, & Resources**

Compliance with Standards for Facilities recognizes that a COM has available the appropriate physical resources (i.e., classroom and laboratory space, library resources, and computer technology) necessary to fulfill the mission and objectives and to support the curriculum of the COM, including a review process for affiliated teaching sites.

Does the COM Self-Study adequately address the above statement regarding Facilities, Equipment, & Resources?

Yes     No

Comments:

**Standard Four: Faculty**

Compliance with Standards for Faculty acknowledges that a COM has employed a sufficient number and appropriately trained faculty qualified by education and experience to design, manage, evaluate, and deliver the curriculum of instruction for a doctoral degree in osteopathic medicine. In addition, the COM must develop and implement a faculty development program and have in place a faculty organization and policy and procedures relevant to faculty recruitment, responsibilities, and retention.

Does the COM Self-Study adequately address the above statement regarding Faculty?

Yes     No

Comments:

**Standard Five: Students**

Compliance with Standards for Students acknowledges that a COM defines and uses fair and equitable policies and procedures for the recruitment and admission of students capable of mastering the curriculum consistent with the college's mission. Additionally, the COM is required to have in place and publish appropriate policies and procedures for the transfer of credits; assessment of student academic performance and post-graduate career tracks; and services devoted to student affairs (e.g., financial aid, academic counseling, physical and mental health care).

Does the COM Self-Study adequately address the above statement regarding Students?

Yes     No

Comments:

**Standard Six: Curriculum**

Compliance with Standards for Curriculum refers to the development and implementation of curricula designed to achieve the COM's mission and objectives. The COM must integrate osteopathic principles and practices throughout the entire curricula, including its clinical instruction. The COM must also develop and implement an ongoing review and evaluation of the curricula based on specific educational objectives and educational outcomes. The COM must establish clinical competencies and a methodology to ensure that the competencies are being met. In addition, the COM must demonstrate sufficient clinical resources and an assessment process to review such resources.

Does the COM Self-Study adequately address the above statement regarding Curriculum?

Yes     No

Comments:

**Standard Seven: Research & Scholarly Activities**

Compliance with Standard Seven recognizes that the COM has made contributions to the advancement of knowledge and the development of osteopathic medicine through scientific research. Such contributions may include, but are not limited to: benchmarking research, clinical trials, patient care research, educational research, health services research, and scholarly publications.

Does the COM Self-Study adequately address the above statement regarding Research & Scholarly Activities?

Yes     No

Comments:

**Additional Questions**

**What are the COM's strengths explored in the self-study? How are these strengths measured?**

**What are the weaknesses/limitations/challenges reported by the COM in the self-study?**

**How are opportunities for improvement identified and explored by the COM?**

**What differences (if any) were found between the COM's self-study and what the site visit team reported?**



## Progress Report Review Policy & Procedures

### Distribution of the progress report material:

1. The COCA Chair, the assigned COCA reviewers, and AOA staff will receive copies of the COM progress reports and attachments.
2. All COCA members will receive a summary of all requirements from the official report. This summary is usually contained in the memorandum prepared by AOA staff.
3. Complete copies of all COM progress reports and attachments will be available for COCA members' review at its regularly scheduled meeting.

### Review and discussion of the progress report:

4. Two COCA reviewers will be assigned to each COM progress report.
  - a. AOA staff will provide reviewer contact information to each reviewer
  - b. AOA staff will provide contact information for the Team Chair to each reviewer
  - c. Each reviewer will share their reviews with the other
5. The COCA reviewers will write a report in a specific report format (*Attachment A*) on their assessment of the progress report and any attachments submitted. These reports will be distributed to all COCA members and will include:
  - a. The reviewers' rationale for recommending whether each requirement is met or not met.
6. Reviewers will present their findings and their recommendation to the entire COCA for discussion.
7. All COCA members will be given the opportunity, over the course of the meeting, to review all progress reports and attachments, as necessary.
8. The COCA vote on these reports will be scheduled at a later point in the agenda to allow COCA members time for additional review. The COCA will vote on the reviewers' recommendations following a thorough review of all COM progress reports and attachments.
9. AOA staff will generate a written report based on the reviewers' findings (*Attachment B*). The report will indicate why requirements were met or not met and further clarify what the reviewers believe are necessary to achieve compliance with the standards. After the COCA Chair and reviewers have approved the report, it will be marked as final and forwarded to the COM

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# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

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## ANNUAL REPORT REVIEW PROCEDURES

The Annual Osteopathic Medical School Questionnaire (Annual Report) is required for all colleges of osteopathic medicine (COM) with Pre-accreditation status, Provisional Accreditation status, or Full Accreditation status. According to the *Accreditation of Colleges of Osteopathic Medicine*, Chapter Five: Accreditation Procedures, Monitoring Accredited Programs:

*The AOA/AACOM Annual Report of a COM will be submitted to the AOA Department of Accreditation, Division of Predoctoral Education no later than December 15 for consideration by the Commission on Osteopathic College Accreditation at its Spring meeting.*

In order to facilitate this review, the following process has been developed:

1. Predoctoral Education staff will complete the Annual Statistical Report form with data from the combined AACOM/AOA Annual Osteopathic Medical School Questionnaire.
2. All members of the Commission on Osteopathic College Accreditation (COCA) are required to review the COM Annual Reports form and the COM Annual Supplemental Report.
3. COCA members will be paired to review either two or three different annual reports. A Primary Reviewer will be assigned for each report. See Annual Report Review Team List.
4. The Annual Report Review Form is provided to aid the team in their review of the annual reports and can be used to provide documentation of their review. See Annual Report Review Form.
5. Using the Annual Report Review form, each **Primary Reviewer in consultation with the Secondary Reviewer** will provide written feedback to the COCA by the due date indicated.

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# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

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## ANNUAL REPORT REVIEW TEAM LIST ACADEMIC YEAR 2007-2008

COM	PRIMARY REVIEWER	SECONDARY REVIEWER
ATSU-SOMA		
DMU-COM		
KCOM/ATSU		
KCUMB-COM		
LECOM and Bradenton		
LMU-DCOM		
MSUCOM		
MWU/AZCOM		
MWU/CCOM		
NSU-COM		
NYCOM		
OSU-COM		
OU-COM		
PCOM and GA-PCOM		
PCSOM		
TOUROCOM		
TUCOM-CA and TUNCOM		
UMDNJ/SOM		
UNE/COM		
UNTHSC/TCOM		
VCOM		
WesternU/COMP		
WVSOM		

**[SUBJECT TO CHANGE]**

COCA members are paired into teams. Due to the volume of material to be reviewed at the April COCA meeting, some team members will only be serving as primary reviewer on one annual reports because they will be reviewing other materials.

# MEMO



AMERICAN OSTEOPATHIC ASSOCIATION

Date:

To: **Primary Reviewer:**

**Name**

**Phone #; Email**

Secondary Reviewer:

**Name**

**Phone #; Email**

From: Andrea Williams, MA, Director, Division of Predoctoral Education

**2007-2008 Annual Report Review**

Re: **COM Name**

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Thank you in advance for reviewing the 2006-2007 Annual Report and the Annual Supplemental Report for COM Abbreviation. Please answer the questions on the Review Form on the following page and indicate your rationale for any additional review you think may be necessary.

When the **Primary Reviewer** has completed the review of the annual report and annual report supplement, it is his/her responsibility to contact the **Secondary Reviewer** to discuss their findings and complete the review. The discussion can be done by e-mail or phone. See above for contact information. The **Primary Reviewer** should submit the findings by e-mail or fax on the reviewer form no later than \_\_\_\_\_  
via fax or email to:

Michele Kendall  
Administrative Assistant  
Division of Predoctoral Education  
312/202-8097 (phone)  
312/202-8397 (fax)  
Michelek@osteopathic.org (e-mail **preferred**)

If the **Secondary Reviewer** also chooses to provide written comments on the assigned COM, he/she may use the attached Annual Report Review form and submit it as described above.

Please contact me if you have any questions at [awilliams@osteopathic.org](mailto:awilliams@osteopathic.org) or 312-202-8096.

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# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

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## ANNUAL REPORT REVIEW FORM [COM Abbreviation]

Reviewers: Primary Reviewer and Secondary Reviewer

1. Are there any data that need further clarification? If so, please indicate which data.

2. Does the reported tabular data suggest that further monitoring by the COCA is necessary? If so, please provide a detailed explanation of your rationale.

3. Does the supplementary information suggest that further monitoring by the COCA is necessary? If so, please provide a detailed explanation of your rationale.