

COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

May 15, 2020

This supplements the March 11, 2020 guidance for Colleges of Osteopathic Medicine (COMs) related to Coronavirus (COVID-19).

The Executive Committee of the Commission on Osteopathic College Accreditation (COCA) met on May 7, 2020 for a regularly scheduled meeting. During discussion of how COMs are responding to challenges of the pandemic, it was noted that the COCA's statement of March 11, 2020 provided limited approval for the use of distance learning and certain other suggested methods of instruction for students who were unable to complete scheduled clinical rotations in hospitals because the hospitals had been closed to students and other non-essential personnel. COMs were asked to provide a report to COCA on changes to their educational program by April 1, 2020 with further reporting on a monthly basis.

The guidance described above only provided authority through the end of the Title IV funding period. Many states and counties have extended their shelter-in-place and other restrictions on large group meetings beyond the end of the prior Title IV funding period. Subsequent to the COCA's March 11 guidance, the United States Department of Education Office of Postsecondary Education issued additional information on April 3, 2020 regarding the applicable timeline of the additional regulatory flexibilities available to postsecondary institutions. Specifically, the April 3 information noted the extension of those flexibilities to any Title IV payment period or term beginning between March 5, 2020 and June 1, 2020, with a further notation that the Department was extending flexibilities until and through June 30, 2020. Therefore, the COCA Executive Committee approved a motion to extend the flexibilities identified in its March 14 guidance consistent with the time period identified by the US Department of Education. During this time period, COMs should continue to report to COCA on a monthly basis regarding any changes to its previously reported curriculum.

Guidance from the US Department of Education also provided information concerning accreditors and policies related to distance education, noting that accreditors could waive distance education review requirements, while also encouraging accreditors to develop policies and procedures for timely approval of distance education programs for institutions that are working to accommodate students whose enrollment would otherwise be disrupted by COVID-19. Therefore, the COCA Executive Committee voted to instruct staff to develop appropriate distance education requirements and advise the US Department of Education of the COCA's intent to develop such standards. COMs utilizing distance education are encouraged to review the requirements set forth in 34 CFR 600.2 and make certain that the distance education model they utilize requires that instructors initiate substantive communication with students on a regular basis.

In addition, COCA wishes to inform COMs that they should check with the regional accreditors and state departments of education to ensure compliance with any distance education requirements they may have.