# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION John M. Ferretti, DO, FACOI, Chair

This report is for the period from June 1, 2008 through May 31, 2009. During this period the AOA Commission on Osteopathic Accreditation (COCA) met three times: September 6-7, 2008; December 13-14, 2008; and May 2-3, 2009. A workshop for members of the evaluators registry of the colleges of osteopathic medicine (COM) was conducted on January 10-11, 2009.

#### COCA meeting in September 2008

The COCA met on September 6-7, 2008 at the O'Hare Hilton Hotel (Chicago, IL). An orientation session was conducted for newly appointed members. Accreditation action items for the agenda included:

- One report from a full accreditation site visit was reviewed and accepted for the parent Touro University College of Osteopathic Medicine (Vallejo, CA) and its branch campus Touro University College of Osteopathic Medicine (Henderson, NV).
- Two reports for initial additional location site visits were reviewed and accepted: for the Lake Erie College of Osteopathic Medicine additional location at Seton Hill University (Greensburg, PA); and the two additional locations for Michigan State University College of Osteopathic Medicine at the University Center of the Macomb Community College (Clinton Township, MI) and Detroit Medical Center (Detroit, MI).
- □ Four reports from focused site visits were reviewed and accepted: Georgia Campus Philadelphia College of Osteopathic Medicine (Suwanee, GA); Kansas City University of Medicine and Biosciences-College of Osteopathic Medicine (Kansas City, MO); Lake Erie College of Osteopathic Medicine-Bradenton (Bradenton, FL) and Midwestern University/Arizona College of Osteopathic Medicine (Glendale, AZ).
- □ Two requests for substantive change additional location advanced in the approval process by receiving permission to begin operations, including recruiting and admitting students: for the Lake Erie College of Osteopathic Medicine additional location at Seton Hill University (Greensburg, PA); and the two additional locations for Michigan State University College of Osteopathic Medicine at the University Center of the Macomb Community College (Clinton Township, MI) and Detroit Medical Center (Detroit, MI).
- □ One request for substantive change change in legal status or form of control or ownership of the institution was approved for the Rocky Vista University-College of Osteopathic Medicine (Parker, CO).
- □ Three requests for substantive change class size increase were approved for: Midwestern University/Chicago College of Osteopathic Medicine (Downers Grove, IL); University of Medicine and Dentistry of New Jersey School of Osteopathic Medicine (Stratford, NJ); and University of North Texas Health Science Center Texas College of Osteopathic Medicine (Fort Worth, TX).
- Thirteen progress reports were reviewed and accepted for the following COMs: A.T. Still University-School of Osteopathic Medicine in Arizona (Mesa, AZ); Kansas City University of Medicine and Biosciences College of Osteopathic Medicine (Kansas City, MO); Lincoln Memorial University-DeBusk College of Medicine (Harrogate, TN); Michigan State University College of Osteopathic Medicine (East Lansing, MI); Midwestern University Arizona College of Osteopathic Medicine (Glendale, AZ); Nova Southeastern University-College of Osteopathic Medicine (Fort Lauderdale, FL); New York College of Osteopathic Medicine of New York Institute of Technology (Old Westbury, NY); Pikeville College School of Osteopathic Medicine (Pikeville, KY); Pacific Northwest University of Health Sciences-College of Osteopathic Medicine (Yakima, WA); Touro College of Osteopathic Medicine (New York, NY); University of North Texas Health Sciences College of Osteopathic Medicine of the Pacific (Pomona, CA); and West Virginia School of Osteopathic Medicine (Lewisburg, WV).

- ☐ The request for substantive change-class size increase for the Oklahoma State University Center for Health Sciences College of Osteopathic Medicine (Tulsa, OK) was changed in status from "conditionally approved" to "deferred" pending receipt of additional information.
- One special report was reviewed and accepted from the Midwestern University/Arizona College of Osteopathic Medicine (Glendale, AZ).
- □ Eight follow-up reports based upon review of the annual reports were reviewed and accepted for the following COMs: Lake Erie College of Osteopathic Medicine Bradenton (Bradenton, FL); Michigan State University College of Osteopathic Medicine (East Lansing, MI); Ohio University College of Osteopathic Medicine (Athens, OH); Oklahoma State University College of Osteopathic Medicine (Tulsa, OK); Touro College of Osteopathic Medicine (New York, NY); University of New England College of Osteopathic Medicine (Biddeford, ME); University of North Texas Health Science Center Texas College of Osteopathic Medicine (Fort Worth, TX); and the West Virginia School of Osteopathic Medicine (Lewisburg, WV).
- ☐ This meeting marked the first use of a "consent agenda" for those progress reports with recommendations that all requirements to be reported were satisfied.

#### Policy discussion items for the agenda included:

- □ The President of the National Board of Osteopathic Medical Examiners (NBOME) accepted the invitation to provide testimony on the COMLEX Part 2-PE examination experience at the September 2008 COCA meeting. At the meeting, the NBOME President spoke about the COMLEX process and introduced some of the proposed models in the upcoming changes, which may be implemented about 2014-2015.
- □ The draft Interim Policy Statement on Accreditation of International Colleges of Osteopathic Medicine was authorized to be distributed for public comment.
- ☐ The document containing the proposed revisions for *Appendix C: Telephone Interview and Questions for Affiliated Sites* was received and reviewed by the COCA.
- ☐ Membership on the COCA Appeal Panel was approved for the 2008-2009 year.
- □ Eight nominees to the Evaluators Registry were approved.

#### COCA meeting in December 2008

The COCA held its fall meeting on December 13-14, 2008 at the O'Hare Hilton Hotel (Chicago, IL). Accreditation action items for the agenda included:

- □ Two reports from a full accreditation site visit were reviewed and accepted for the New York College of Osteopathic Medicine of the New York Institute of Technology (Old Westbury, NY) and Oklahoma State University Center for Health Sciences College of Osteopathic Medicine (Tulsa, OK).
- Continuing accreditation was granted to the New York College of Osteopathic Medicine of the New York Institute of Technology (Old Westbury, NY) and Oklahoma State University Center for Health Sciences College of Osteopathic Medicine (Tulsa, OK).
- □ Three special reports were reviewed and accepted from the following COMs: one from Midwestern University/Arizona College of Osteopathic Medicine (Glendale, AZ) and two from Rocky Vista University College of Osteopathic Medicine (Parker, CO).
- One reconsideration was heard for the Kansas City University of Medicine and Biosciences College of Osteopathic Medicine (Kansas City, MO).

- □ Seven progress reports were reviewed and accepted for the following COMs: A.T. Still University-School of Osteopathic Medicine in Arizona (Mesa, AZ); Lake Erie College of Osteopathic Medicine − location at Seton Hill (Seton Hill, PA); Michigan State University-College of Osteopathic Medicine (East Lansing, MI); Michigan State University-College of Osteopathic Medicine additional locations in Greater Detroit at Macomb University Center (Clarion Township, MI) and Detroit Medical Center (Detroit, MI); Pacific Northwest University of Health Sciences-College of Osteopathic Medicine (Yakima, WA); Touro University College of Osteopathic Medicine (Vallejo, CA) and Touro University Nevada College of Osteopathic Medicine (Henderson, NV); and Western University of the Health Sciences-College of Osteopathic Medicine of the Pacific (Pomona, CA).
- One request for substantive change-class size increase was continued in "deferral" for the Oklahoma State University Center for Health Sciences College of Osteopathic Medicine (Tulsa, OK).
- One request for substantive change- curriculum was reviewed and approved for the University of Medicine and Dentistry of New Jersey School of Osteopathic Medicine (Stratford, NJ).
- One request for substantive change additional location and class size increase was reviewed and approved for the Western University College of Osteopathic Medicine of the Pacific (Lebanon, OR).

Policy discussion items for the agenda included:

- □ Commentary on the draft *Interim Policy Statement on International Accreditation of Colleges of Osteopathic Medicine* was received and discussed. Upon a motion duly made and seconded, the COCA voted to approve the policy document with amendments.
- □ Commentary was received on proposed revisions to the document Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures as circulated following the standards and procedures forum conducted on September 5, 2008. After discussion, the COCA voted for the Standards Review Committee to host a teleconference of the stakeholders in early 2009 to further discuss the proposed changes.
- □ A foot note was approved for standard 1.1.1 to clarify how the standard would be assessed.
- □ The initial report of the survey of COM standards and procedures, conducted in July 2008 was presented to the COCA. The COCA authorized its Standards Review Committee to prepare a work plan for revision and present it to the COCA for review at its April 2009 meeting.
- ☐ The COCA received testimony from the National Chair, Council of Osteopathic Student Government Presidents, on the topic of anti-discrimination in accreditation policies. The COCA voted to refer the resolution to COCA Standards Review Committee for consideration as part of its comprehensive standards review process.
- ☐ The COCA reviewed four nominees to the Consultants for College Accreditation listing. Two were approved for inclusion. Two were denied based upon their limited experience with COM accreditation.
- □ The COCA reviewed eight nominees to the Evaluator's Registry. The COCA voted to approve the eight (8) nominations to the Evaluators Registry. The COCA also voted to approve all three (3) nominations of Evaluators Registry members to the positions of team chairs.

# COCA meeting in May 2009

The COCA held its spring meeting on May 2-3, 2009 at the O'Hare Hilton Hotel (Chicago, IL). Accreditation action items from the agenda included:

- One report from an initial pre-accreditation on-site evaluation was reviewed and accepted for the William Carey University College of Osteopathic Medicine (Hattiesburg, MS).
- ☐ Initial pre-accreditation was granted to the William Carey University College of Osteopathic Medicine (Hattiesburg, MI).

- Five reports from comprehensive provisional accreditation on-site evaluations were reviewed and accepted for the following COMs: A.T. Still University, School of Osteopathic Medicine in Arizona (Mesa, AZ); Lincoln Memorial University-DeBusk College of Osteopathic Medicine (Harrogate, TN); Pacific Northwest University of Health Sciences, College of Osteopathic Medicine (Yakima, WA); Rocky Vista University College of Osteopathic Medicine (Parker, CO); and Touro College of Osteopathic Medicine (New York, NY).
- Continuing provisional accreditation was granted to the following five COMs: A.T. Still University, School of Osteopathic Medicine in Arizona (Mesa, AZ); Lincoln Memorial University-DeBusk College of Osteopathic Medicine (Harrogate, TN); Pacific Northwest University of Health Sciences, College of Osteopathic Medicine (Yakima, WA); Rocky Vista University College of Osteopathic Medicine (Parker, CO); and Touro College of Osteopathic Medicine (New York, NY).
- Two reports from focused site visits were reviewed and accepted for the following COMs: Georgia Campus Philadelphia College of Osteopathic Medicine (Suwanee, GA); and Midwestern University, Arizona College of Osteopathic Medicine (Glendale, AZ).
- Seven progress reports were reviewed and accepted from the following COMs: Kansas City University of Medicine and Biosciences College of Osteopathic Medicine (Kansas City, MO); Lake Erie College of Osteopathic Medicine at Seton Hill University (Greensburg, PA); Michigan State University, College of Osteopathic Medicine at Macomb University Center and Detroit Medical Center (Macomb, MI and Detroit, MI); Oklahoma State University Center for Health Sciences College of Osteopathic Medicine (Tulsa, OK); Pacific Northwest University of Health Sciences, College of Osteopathic Medicine (Yakima, WA); Pikeville College School of Osteopathic Medicine (Pikeville, KY); and Touro University College of Osteopathic Medicine (Vallejo, CA)
- Three special reports were reviewed and accepted from the following COMs: one from the Rocky Vista University College of Osteopathic Medicine (Parker, CO); and two from the University of North Texas Health Science Center Texas College of Osteopathic Medicine (Fort Worth, TX).
- One reconsideration was heard for the New York College of Osteopathic Medicine of New York Institute of Technology (Old Westbury, NY).
- One request for substantive change class size increase was removed from "deferred" status and given approval for the Oklahoma State University Center for Health Sciences – College of Osteopathic Medicine (Tulsa, OK).
- ☐ One request for substantive change class size increase was reviewed for the Pacific Northwest University of Health Sciences College of Osteopathic Medicine (Yakima, WA).
- Annual reports were received and accepted from all 25 COMs; additional information was requested from 10 of the COMs.

#### Policy discussion items for the agenda included:

- □ Commentary was received on proposed revisions to the document *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures* as circulated following the December 13-14, 2008 meeting of the COCA. After review of the commentary and discussion, the COCA voted to approve the proposed revisions as presented. The revisions become effective on July 1, 2009.
- An analysis of the recent standards survey was presented along with a proposed work plan for revision of the standards and procedures. After discussion, the COCA voted to accept the work plan.
- The COCA received a report on the legal basis for anti-discrimination law. The COCA directed that the resolution entitled, "Updating of Anti-discrimination Policies of Osteopathic Professional Organizations" submitted by the Council of Osteopathic Student Government Presidents (COSGP) be referred to the COCA Standards Review Committee for its review and recommendation.

#### COCA - Executive Committee (COCA - EC)

**December 2008 Report** – A report was given of the October 17, 2008 meeting of the COCA-EC by teleconference.

- ☐ Informational -- The COCA-EC reviewed one feasibility study and voted to request additional information prior to scheduling the initial pre-accreditation visit.
- ☐ Action in executive session -- After deliberation, the COCA-EC voted to continue investigation of the complaint by requesting the Dean provide additional documentation for presentation and consideration by the COCA in executive session at its December 13-14, 2008 meeting.
- Action by the COCA The COCA-EC was asked for interpretation of standard 5.2.1: "The minimum requirement for admission to a COM must be no less than 75 percent of the credits needed for a baccalaureate degree from a college or university accredited by an agency recognized by the United States Department of Education." After study, the COCA-EC recommended that: (1) an institution holding a recognition status from a regional accrediting agency, recognized by the U.S. Secretary of Education, and making that institution eligible to participate in Title IV student loan programs would meet the requirements of this standard; and (2) that COCA standards be revised during the current revision process to indicate the meaning of "accredited" as being eligible to participate in the Higher Education Act Title IV student financial programs of the U.S. Department of Education. The COCA approved this recommendation.
- Action by the COCA -- The COCA Procedures describe the process for progression from preaccreditation → to provisional accreditation → accreditation. There are only two statements about
  privileges (see Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures for
  Accreditation, effective July 1, 2008 available from <a href="http://www.aoacoca.org">http://www.aoacoca.org</a>): Requesting approval of a
  branch campus requires that a COM be free-standing and have accreditation status from the COCA as it
  institutional accreditor, and "Accreditation status is the highest level of accreditation awarded, and
  confers all rights and privileges of accreditation." The COCA Standards and Procedures do not address
  what privileges are held by COMs having provisional accreditation other than those related to operations,
  e.g. recruiting and admitting students and offering instruction. After deliberation, the COCA –EC voted
  to recommend to the COCA that it interpret the conferral of all rights and privileges of accreditation to
  generally apply to substantive change requests. The COCA approved this recommendation.

**MAY 2009 Report** – A report was given of the February 19, 2009 meeting of the COCA-EC by teleconference:

- ☐ Informational -- The COCA-EC reviewed one feasibility study and voted to authorize conducting an initial pre-accreditation site visit. The COCA-EC directed that selected specific information remained to be collected at the site visit.
- □ Action by the COCA The COCA received a letter from the OSU-COM asking for permission to reposition the Department of Behavioral Sciences from its current location in the Clinical Sciences Division to the Biomedical Sciences Division. After deliberation, the COCA-EC voted to recommend to the COCA that the OSU-COM be granted permission to reposition the Department of Behavioral Sciences from the Clinical Sciences Division to the Biomedical Sciences Division. The COCA approved this recommendation.
- Action by the COCA -- The COCA-EC was asked for interpretation of Standard 4.2.1. The specific question was whether an osteopathic physician with AOA certification in internal medicine could lead a department of family medicine and *vice versa*. After deliberation, the COCA-EC voted to recommend to the COCA that: the AOA board certification referred to in Standard 4.2.1 is expected to be specific to the disciplines described. This means that the chair or its equivalent in the family medicine discipline must have general certification from the American Osteopathic Board of Family Physicians (AOBFP); and, the chair or its equivalent in the internal medicine discipline must have general certification from the American Osteopathic Board of Internal Medicine (AOBIM). The COCA approved this recommendation.

#### Annual Report Review Committee

## September 2008 Report—No report

**December 2008 Report** – An informational report was given of the October 20 meeting by teleconference:

- ☐ The Committee members reviewed each question in the COCA Annual Supplemental Report form in order to make revisions as needed sending it to COMs for completion at the end of 2008. The proposed changes were communicated to the COCA.
- □ Standard 1.1.1 became effective on July 1, 2008. The committee approved the format of this mid-cycle report. A copy of the report instructions were communicated to the COCA.
- □ Because the 2008-2009 AACOM Annual Report was in the process of being distributed to the COMs, it was determined by the Annual Report Committee members that in the spring of 2009 they should meet with AACOM representatives to discuss and review the report for possible changes to the 2009-2010 AACOM Annual Report.

# May 2009 Report—No report

## COM Accreditation Appeal Panel

There were no appeals heard during this year.

Committee on College Accreditation Training (CCAT)

**September 2008 Report** – An informational report was given of the June 4, 2008 meeting by teleconference:

- □ Staff reported on development of the program content for the first Webinar to train new COM evaluators. At the time of the September 2008 COCA meeting, ten (10) evaluators were confirmed to participate in the program, which was conducted in two 1½ hours sessions in September 2008. Each session also included pre- and post tests and evaluation surveys. Participants were also be given reading assignments in preparation for each session.
- The CCAT Evaluators Training Workshop is scheduled for January 10-11, 2009 in Fort Lauderdale, FL at the Hyatt Regency Pier 66 Resort & Spa as part of the AOA OME/CME cluster meetings. The Committee has not yet reached a consensus regarding a theme for the program; however, based on the problematic areas identified during the review of the 2007-2008 site visits, it identified several potential topics to help address those issues. Committee members agreed that the program should include professional development for the site visit team chairs as they set the tone of the visit and should provide consistency throughout the process. The CCAT Chair noted that the AOA should define the role of evaluators and that best practices should be developed to ensure that the process is clear and transparent.

**December 2008 Report** – The Committee hosted its Web-based training program for new evaluators in September. The program consisted of two staff facilitated sessions, each lasting 1½ hours. Each participant was required to complete both sessions. The sessions were held on September 11 and September 25 from 4:00 p.m. to 5:30 p.m. CDT. Twelve new evaluators participated in the program. These interactive sessions included preand post tests, reading and/or case studies homework assignments, and group discussion and presentations. Part 1 of the program included introductions, an overview of accreditation, responsibilities of team members, types of visits, and the role of the evaluator during the site visit. Part 2 focused on utilizing the Documentation Pad in the report writing process, writing an evidence-based site visit report, and post site visit activities, such as how to complete the expense reimbursement voucher.

At the end of each program, participants were asked to complete an online evaluation survey. In addition, after a participant completes his or her trainee visit, they will receive another evaluation survey to assess how well the Web-based training prepared them for the visit.

Participants of the program provided excellent feedback and rated the overall program as "Excellent" or "Above Average." A written summary of the evaluation results was presented to the COCA.

**May 2009 Report** -- The Committee on College Accreditation Training (CCAT) held its biennial Evaluators Training Workshop on January 10-11, 2009, in Fort Lauderdale, FL. Fifty-nine evaluator attendees convened at the Hyatt Regency Pier 66 Resort for the 1½ day program, held in conjunction with the AOA OME/CME Conferences.

Patricia M. O'Brien, SND, Associate Director, Commission on Institutions of Higher Education, New England Association of Schools and Colleges delivered the keynote address on evidence-based report writing. Later, attendees participated in breakout sessions tailored to their respective areas of expertise and level of accreditation experience.

David Gensure, Director, Continuing Education, Nova Southeastern University, College of Osteopathic Medicine, facilitated a session on situational leadership designed for team chairs. The afternoon agenda included presentations on implementing competencies, linking student performance to curricular revision, and assessing and using learning outcomes. On Sunday, attendees had an opportunity to apply their collective knowledge as they worked through a case study simulating an on-site accreditation visit including writing the site visit report.

ad hoc Standards Review Committee (SRC)

September 2008 Report - No report

December 2008 Report – No report

May 2009 Report -- The SRC held a teleconference on March 2, 2009 to make modifications and clarifications of the proposed revised standards. The modifications and clarifications were sent to stakeholders and posted on the COCA website for review and commentary. A teleconference of stakeholders, SRC members and COCA members was scheduled to convene on April 3, 2009. Stakeholders not able to participate in the teleconference were able to submit their commentary in writing to the SRC by April 17, 2009.

The SRC held a forum by teleconference on Friday, April 3, 2009 at 11 a.m. CDT for stakeholders to discuss and offer commentary on the proposed standard revisions with modifications and clarifications. Twenty-five stakeholders and SRC members were represented on the teleconference and three staff. In addition to the comments from the stakeholders, written commentary was submitted by four stakeholders. All proposed revisions or changes in the standards and the written response comments were presented to the COCA for its review at its May 2009 meeting.

## Continuing Recognition of the COCA by the U.S. Secretary of Education

On May 1, 2006, the Honorable Margaret Spellings, Secretary of Education, granted five years of continuing recognition to the COCA. An interim petition with changes approved by the COCA in its conflict of interest procedures in the COCA *Handbook*, and in its procedures stated in the *COM Accreditation Standards and Procedures* was sent to staff of the U.S. Department of Education on December 7, 2006. The U.S. Department of Education staff analysis was that there were no remaining issues and the report should be accepted. This recommendation was presented to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its meeting held on May 30-31, 2007. The NACIQI recommendation to the Secretary was to accept the report with a finding of no issues. On August 15, 2007 Secretary Spellings accepted the recommendation of the NACIQI.