

American Osteopathic Association
Commission on Osteopathic College Accreditation

Evaluator Manual

Effective July 1, 2023



AMERICAN OSTEOPATHIC ASSOCIATION

This document should be read in conjunction with the current revision of the Commission on Osteopathic College Accreditation's (COCA) Standards which may be found at <https://osteopathic.org/accreditation/standards/>. The Association of Specialized and Professional Accreditors (ASPA) offers an informative, easy-to-follow overview of the accreditation process on its website at <http://www.aspa-usa.org/>. The website is a great resource for evaluators who are new to the accreditation process.

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About the COM Evaluator Manual

The American Osteopathic Association’s Commission on Osteopathic College Accreditation (COCA) Evaluator Manual (Manual) has been developed to provide information to assist site visit team members before, during, and after an accreditation site visit to a college of osteopathic medicine. In addition to the information in this manual, team members are responsible for thoroughly reviewing and understanding the COCA’s Standards, and Policies and Procedures.

Authority and Purpose

The AOA has a long history of accreditation of its COMs. In 1952, the American Osteopathic Association was initially recognized by the United States Department of Education (USDE) as an accreditor for osteopathic medical education programs. The COCA’s recognition was last reaffirmed in 2021. The COCA’s scope of recognition is defined as: “the accreditation and pre-accreditation (“Provisional Accreditation”) of freestanding institutions and distance learning education programs of osteopathic medicine and of osteopathic medical programs leading to the degree of Doctor of Osteopathy or Doctor of Osteopathic Medicine.”

USDE recognition establishes the COCA as an agency authorized to evaluate whether an osteopathic medical education program meets the standards established by the COCA. By assessing the compliance of osteopathic medical education programs based on the nationally accepted standards of the COCA, the interests of the public and the students are served.

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

Accreditation and Higher Education

Overview of Accreditation

As practiced in the United States today, accreditation is a process by which institutions and programs voluntarily submit to an extensive peer-based evaluation of their compliance with accepted standards for educational quality. Higher education in the United States relies on accreditation to ensure quality and to foster a culture of continuous improvement. Accreditation offers a mark of distinction for academic programs and institutions, signaling high quality and a commitment to excellence.

There are two distinct accreditations in higher education:

1. Programmatic (specialized and professional) accreditation conducts an in-depth assessment of specialized or professional programs at a college, university, or independent institutions.
2. Institutional accreditation reviews academic and organizational structures of a college or university as a whole.

Through accreditation, the COCA provides assurance to osteopathic medical students and graduates, the medical profession, healthcare institutions, and the public that: (1) educational programs culminating in the award of the DO degree meet reasonable, generally accepted, and appropriate national standards for educational quality; and (2) graduates of such programs have a complete and valid educational experience sufficient to prepare them for the next stage of their training. COCA standards for educational program quality are contained in the documents *Accreditation of Colleges of Osteopathic Medicine: COM New & Developing Accreditation Standards*” and *Accreditation of Colleges of Osteopathic Medicine: COM Continuing Accreditation Standards* available on the COCA’s website (www.aoacoca.org).

COCA Mission, Goals, and Objectives

The COCA serves the public by establishing, maintaining, and applying accreditation standards and procedures to ensure that the academic quality and continuous quality improvement of the education delivered by the COMs reflect the evolving practice of osteopathic medicine. The scope of the COCA's work encompasses the accreditation of COMs.

Goal One

To serve the public and interested communities (*e.g.*, colleges of osteopathic medicine, osteopathic medical community, etc.) by ensuring the continued effectiveness of the COCA.

Objectives:

1. Maintain an independent and objective accreditation process.
2. Inform the public and the communities of interest regarding the accreditation status of programs and institutions.
3. Develop and implement policies with integrity and high ethical standards.
4. Continue to seek the most cost-effective way to provide the services of the COCA.
5. Develop and disseminate information that demonstrates the effectiveness of the COCA's operations.
6. Maintain liaison between the COCA and its constituents.
7. Keep the community of interest informed of current trends and developments in specialized accreditation.
8. Serve as a resource on accreditation.

Goal Two

To develop, maintain, apply, and periodically review the COCA's accreditation processes and the accreditation standards for COMs.

Objectives:

1. Review COM programs and institutions and make accreditation decisions in accordance with COCA's standards and procedures.
2. Establish and disseminate standards, policies, and procedures for the COMs accredited by the COCA.
3. Comprehensively review the accreditation standards at least every five years.
4. Solicit suggestions from accrediting teams relative to standards, procedures, and processes.
5. Solicit suggestions from the community of interest relative to standards, procedures, and processes.
6. Identify competent individuals and provide appropriate training so they can participate in accreditation on-site visits.
7. Evaluate the performance of all evaluators and use the results of the evaluations to identify areas needing emphasis in the training process.
8. Inform the evaluators of their performance and how they can improve.

9. Monitor programs in the interim between on-site visits through annual reports, mid-cycle reports, progress reports, interim progress reviews, and focused visitations.

Goal Three

To foster continuous quality improvement of osteopathic medical education by encouraging innovation and creativity in COM programs and institutions.

Objectives:

1. Communicate to the community of interest that the COCA encourages innovation and creativity in the COM.
2. Ensure that the policies and the procedures of the COCA do not inhibit innovation.
3. Ensure that the COCA and *Evaluators Registry* members perceive innovation as a necessary and positive approach to foster continuous quality improvement in osteopathic medical education.
4. Create standards which tie institutional planning to ongoing assessment of a COM's effectiveness.

Goal Four

To assure the continued effectiveness of the accreditation process by the development and application of continuous quality assurance, self-assessment, and external review of the COCA.

Objectives:

1. Maintain recognition by the USDE, by meeting all federal regulations for accreditation as found in the Code of Federal Regulations.
Seek external review by organizations that recognize accrediting bodies and follow accepted codes of good practice.
2. Engage in planning and conduct periodic self-assessments.
3. Evaluate and test the validity and reliability of the COCA's processes.
4. Maintain a committee structure that involves COCA members, and other experts in planning, quality improvement, and self-assessment.
5. Seek regular input from the community of interest relative to planning, quality improvement, and self-assessment.

Accreditation action taken by the COCA means a college or school of osteopathic medicine has appropriately identified its mission, has secured the resources necessary to accomplish that mission, shows evidence of accomplishing its mission, and demonstrates that it may be expected to continue to accomplish its mission in the future. Accreditation of a COM means that the COM incorporates the science of medicine, the principles and practices of osteopathic manipulative medicine, the art of caring and the power of touch within a curriculum that recognizes the interrelationship of structure and function for diagnostic and therapeutic purposes; recognizes the importance of addressing the body as a whole in disease and health; and recognizes the importance of homeostasis and self-regulation in the maintenance of health.

Overview of COCA Accreditation Standards

The COCA's Accreditation Standards are organized into 12 standards, each with an accompanying set of elements and evidentiary submission requirements. All COMs must meet the first 11 standards to achieve full accreditation. Standard 12 is applicable only when COCA serves as the institutional accreditor for the COM.

Each of the standards includes a concise statement of the principles that represent the standard. The elements of each standard specify the components that collectively constitute the standard. They are statements that identify the variables that the COCA considers in evaluating a medical education program's compliance with the standard.

Each element includes a list of evidentiary submission requirements that outline documentation that must be provided to demonstrate compliance with the element.

Within each standard, there are elements that are identified as "CORE" elements. A CORE element is critical to maintain the educational quality of the program. Therefore, a COM will be found out of compliance with the standard if it fails to meet any core element within that standard. The COCA will consider other non-core elements, which, while important, are considered in the context of the totality of a COM's response to each of the elements associated with a specific standard in the determination of the compliance with that standard.

In the event a COM fails to meet any standard or element, the COCA will monitor the COM through progress reporting at specified intervals. The COM must come into compliance with each standard or element within 24 months of the initial determination. The USDE requires all standards and all elements to be met within this timeframe or the COCA may take an adverse accreditation action against the COM.

The COCA makes the final determination of whether elements are met, and if COM is compliant with all standards. Accreditation decisions are defined in the COCA standards available on the COCA website <https://osteopathic.org/accreditation/standards/>.

Accreditation for New and Developing COMs

New and developing COMs proceed through a three-stage process before reaching full accreditation:

1. Applicant Status
2. Candidate Status
3. Pre-Accreditation Status

Applicant Status

Applicant status is the initial step in seeking accreditation. This status is offered without rights or privileges of accreditation and does not establish or imply recognition by the COCA. Applicant status is granted upon the formal request for evaluation submitted by the Chief Executive Officer

of the applicant COM. Applicant status is not made public by the COCA and may not be advertised or publicized by the applicant status COM. A school at this stage should identify itself as “XCOM (applicant status – seeking accreditation).” No site review is required for Applicant Status.

Candidate Status

Candidate status is the second step in seeking accreditation and is granted to applicant COMs that demonstrate compliance with the Candidate standards. When an Applicant COM is granted Candidate Status it must use the word “proposed” as part of its name (e.g., proposed XCOM). A proposed COM’s Candidate Status is publicly recognized by the COCA. The proposed COM holding Candidate Status may not recruit students, accept applications or fees, admit prospective students, or offer instruction. No site review is required for Candidate Status.

Pre-Accreditation Status

Pre-Accreditation Status may be granted to proposed COMs that have achieved Candidate Status and meet the standards of Pre-Accreditation Status. An on-site review will be held for a proposed COM that demonstrates compliance with the Pre-Accreditation standards.

Pre-Accreditation Status is awarded by the COCA after the review of the self-study materials and the Pre-Accreditation Site Visit Report. Upon being granted Pre-Accreditation Status, the COM will have the right and privilege to announce its Pre-Accreditation Status, recruit students, accept applications and fees, and admit students. Instruction within the approved osteopathic medical curriculum may not begin until the COM has passed a pre-operational site visit approximately six months prior to matriculation of the first class. Pre-Accreditation Status may not be designated as Accreditation until the COM has received Accreditation from the COCA.

Due to Department of Education regulations, a COM cannot remain in Pre-Accreditation Status for longer than five years – generally, the year prior to matriculation through OMS-IV. During year four of the COM’s operation, the COCA will conduct a comprehensive site visit to grant the COM Accreditation Status. Should a COM be approved to recruit students more than a year prior to matriculation, the COCA will grant a status of Candidate Status with the Right to Recruit.

Accreditation Status

Accreditation Status is the highest level of accreditation awarded and confers all rights and privileges of accreditation. An educational program leading to the DO degree, once accredited, remains accredited until the program voluntarily terminates its accreditation status, or the COCA terminates the program’s accreditation through a formal accreditation action. A COM’s accreditation status is reviewed at a pre-determined schedule depending on the accreditation status granted. Accreditation statuses are defined in the COCA Standards available on the COCA website <https://osteopathic.org/accreditation/standards/>.

COCA Substantive Change Policies and Procedures

A substantive change is any modification in a COM's operations, governance, or legal status that does not have a material adverse effect that could impact the COM's capacity to continue to meet the COCA's accreditation requirements for the delivery of the osteopathic medical education curriculum. Some substantive change processes involve on-site reviews as part of the application or monitoring activities. Substantive Change Policies and Procedures are posted on the COCA's website <https://osteopathic.org/accreditation/standards/>.

The Accreditation Evaluation Process

Overview

The evaluation process for COMs which are fully accredited or in the process of seeking accreditation includes the completion of a self-study, a site evaluation by a team of site evaluators, and a review of the self-study and site visit report by members of the COCA.

For programs in one of the continuing accreditation statuses, the COCA accreditation staff will contact the institution approximately 12 months before the anticipated date of the accreditation site visit to establish specific dates for the site review. The COM's self-study is due 90 days prior to a site visit, or a COCA review if a site visit is not required.

Comprehensive site visits are typically completed in two to three days. Focused site visits may be completed in one or two days, depending on the nature of visit.

COM Self-Assessment and the Self-Study Document

The primary purpose of the self-assessment activity and culminating self-study is to enable COMs to devise a system for self-appraisal and improvement consistent with both the COM's mission and the COCA's standards and procedures. Self-appraisal involves a collaborative process with all areas of the COM to identify the strengths and weaknesses within the COM. In turn, the COM can then use the self-assessment process and its results as tools for continuous, on-going assessment and improvement. This process is one that provides both summative and formative evaluation. COMs must submit their self-study to the COCA at least 90 days before the scheduled site visit.

Scheduling the Site Visit

Site visits are generally scheduled 12 months in advance. Pre-accreditation monitoring site visits are scheduled during the first and fourth year of class offerings, and interim progress reviews and focused visitations are scheduled on an as-needed basis. Comprehensive site visits for COMs already accredited occur between 3 and 10 years, depending on a COM's accreditation status.

Team Member Selection and Composition

The US Department of Education requires that a site team consists of academic and administrative personnel, as well as educators, practitioners or employers.

Site team selection typically begins eight months in advance of a scheduled site visit. The COCA staff considers several criteria in selecting team members, including the area of expertise, availability, geographical location, conflict of interest, and level of experience. Team members are multi-faceted individuals who have broad knowledge and experience in higher education, COM administration, or osteopathic medicine.

Depending on the nature of the site visit, the site visit team is comprised of an evaluator from each of the following categories.

Administrative Evaluator - Individual engaged in the direction or senior leadership of administrative operations in an institution with an osteopathic medicine degree program. Sample titles: president, vice president, provost, dean, or associate dean.

Pre-Clinical Evaluator - Individual engaged in a significant manner in directing or teaching pre-clinical curriculum (generally the first two years) in an osteopathic medical education program. A minimum of a master's degree is required. Sample titles: faculty member, department chair, or associate/assistant dean.

Clinical Evaluator - Individual engaged in directing or teaching clinical medicine curriculum (generally the last two years) in an osteopathic medical education program. Requires a Doctor of Osteopathic Medicine degree. Sample titles: clinical faculty member, department chair, or associate dean/assistant dean.

Student Services Evaluator - Individual engaged in the direction of or senior leadership in student services operations (academic affairs, registrar, admissions, financial aid services, etc.) in an institution with an osteopathic medicine degree program. Sample titles: department head, director, or associate/assistant dean.

Team Chair - Individuals with experience in any of the above positions, with a DO, PhD, EdD, or JD degree, may serve in the role of a team chair. The team chair is responsible for the overall leadership and direction of the site visit and therefore must have proven leadership and communication skills and an extensive knowledge of the COCA standards and site visit processes. Team chairs are selected by the COCA based on expertise, and past experience as a COCA evaluator.

Team Secretary – an accreditation staff member accompanies the site team to assist with logistical arrangements during the site visit.

A site visit team may also include a site visit evaluator trainee and/or an observer. Observers may, upon formal request and approval by the COCA Secretary, accompany site visit teams. Each observer must not be in violation of the conflict-of-interest standards as adopted by the COCA. Observers from the USDE, and those who represent Federal or State agencies or organizations which

may have a legitimate accreditation responsibility, may also accompany site visit teams. Costs incurred by this observer will be paid by the observer's organization.

COM Approval of Site Visit Teams

The list of proposed team members is submitted to the COM for approval prior to any site visit. . The COM will have an opportunity to request a change in personnel if a conflict of interest is suspected. The COCA Secretary will make the final determination as to whether a change in site visit personnel will be permitted.

Once the site team has been assigned and confirmed, accreditation staff will send details to the team members to assist them in preparing for the visit.

Site Visit Agenda

A site visit based on the type of site visit and the standards being reviewed is developed by accreditation staff in conjunction with the Team Chair and the COM. The site visit agenda lists all the activities that will occur during a site visit and a list of parties that will be interviewed as part of the evaluation process.

Review of Pre-Site Visit Materials

Depending on the nature of the site visit, the following materials are provided to the site team:

1. COM's self-study
2. Snapshot report compiled by accreditation staff with key information about the COM
3. Student survey results
4. Site visit agenda
5. Contact information for team members
6. Expense voucher
7. Team evaluations
8. Instructions for arranging travel
9. Information regarding housing
10. Team member assignments
11. Site visit report template

All information for the site visit is shared with evaluators through SharePoint and will be communicated to the evaluators 30 to 60 days prior to a site visit. While a site team member is only responsible for reviewing sections assigned to them, all site team members are expected to be familiar with all the information provided.

Each site team member is expected to thoroughly review all materials before the site visit. If a team member would like information that is not included, they should contact the site visit team secretary and team chair for assistance. All correspondence should be communicated through the site visit team secretary. There should be no interaction between the site team evaluators and the COM except during the time of the interviews.

In addition to reading the information provided by the COM, each team member must thoroughly review and understand the COCA standards and procedures to assess the COM's compliance accurately and consistently. A copy of the standards may be found on the COCA's website. <https://osteopathic.org/accreditation/standards/>.

Steps to reviewing site visit materials:

1. Review language in the standard and the element as published in the COCA Standards
2. Review evidentiary submission requirement for each element
3. Review documentation submitted by the COM in response to each element
4. Indicate findings on the site visit report
5. Note questions to be asked during the site visit

Team Planning Session

The team secretary will schedule a team planning session about two weeks prior to the site visit to be led by the team chair. During the session, the team chair will discuss the purpose of the visit, the documents reviewed, and the site visit agenda. During this meeting evaluators should be prepared to discuss their preliminary findings from their assigned standards and elements and identify any areas of concern. If there is any need for additional documentation from the COM, the evaluators should be prepared to ask the team secretary for them at this meeting.

The Site Visit

Pre-Visit Meeting and Dinner

Site teams typically arrive at the COM's location in the late afternoon on the day before the site visit begins. The team will have a brief meeting to discuss any last-minute plans before going to dinner.

Entrance Interview

Each site visit begins with an entrance interview for the team to meet COM senior leadership and for the dean to provide an overview of the COM.

Facilities Tour

Each site visit includes a tour of the COM's on-campus facilities. This provides an opportunity for site evaluators to assess key components of the COM's operations such as classroom and laboratory space, student services areas, student lounges, and study spaces, building security, etc. Visits to off-campus clinical rotation sites may also be scheduled for the clinical evaluator.

COM Leadership Interviews

Throughout the site visit, evaluators will meet with various COM representatives to discuss COM operations, e.g., pre-clinical education, clinical education, student services, health services, faculty

committees, finance, facilities, etc. These interviews are used to corroborate the information provided in the COM's self-study and for the evaluator to learn more about the COM's operations. The interview scheduled and the parties being interviewed are arranged in advance by the team secretary and listed on the site visit agenda. If a follow up interview is needed, the evaluator should consult with the team secretary.

Note: During the interview process and throughout the site visit, site evaluators must refrain from discussing issues that are not part of the site visit agenda, and providing advice or personal opinions about COM operations.

Student Interviews

Interviews are scheduled with students from all four years of the program (when available). Interview sessions are generally split into two sessions, OMS I and OMS II in one group, and OMS III and OMS IV in another group. All students are invited to participate in these interviews. When possible, an option for students to participate virtually is provided.

Student interview sessions are led by the team chair and typically begin with the team chair introducing the site team members who ask questions related to their areas of expertise. Students may also request a private meeting with the team chair if they cannot attend the group session or wish to discuss something privately.

Requests for Additional Documentation

At times it may be necessary for an evaluator to request additional documentation. Requests for additional documentation should be made judiciously and in advance of the site visit. The COCA has already defined the submission requirements needed to determine compliance with an element. Any requests should be made through the team secretary, or if the request is made during an interview, the evaluator should notify the team secretary after the meeting so the request can be tracked and added to the site visit record.

Team Dinners

Team dinners are scheduled for each night of the site visit and provide an opportunity for team members to interact in a social setting. Team dinners do not include any COM officials. As team dinners will usually be held in a public setting, the team should refrain from discussing elements of the site visit. Each team member is expected to pay for their own meal and will be reimbursed by the AOA at the conclusion of the visit.

Team Discussions - Building Consensus

During each day of the site visit, the site visit team will have several opportunities to meet in private and discuss their findings, to identify areas requiring additional review, and to begin writing the site visit report.

Once all interviews have been concluded, the team will meet for a final time to review its findings. While the site team does not make the final determination of a COM's compliance with the requirements of an element or standard, it does record its recommendation which must be done before the site visit ends.

It is important at this point in the process that the team has an understanding of how the report will reflect the team's overall findings to ensure that the focus of the report is appropriate for the visit conducted, that all necessary accreditation standards have been reviewed, and the report is clear.

Exit Conference

The exit conference is the final meeting of the site visit, and usually involves the team chair, the team secretary, and the dean and other senior COM administration, as requested by the dean. This meeting provides an opportunity for the team chair to thank the COM for its hospitality and review all subsequent accreditation processes. The team chair can provide a general overview of the site team's findings but must not make any statements to whether a particular element or standard is met or not met. COCA makes that determination.

The Site Visit Report

The site visit report is a critical element of the accreditation process as it is the official record of what was learned by the site team during the visit.

While team members are assigned individual elements to review, discussion among the whole team is critical to sharing insights regarding whether the requirements of an element are met. It is the responsibility of the team chair to build consensus among the team when differences in findings or conclusions exist.

Each evaluator is responsible for writing their findings as to whether each of their assigned elements are met or unmet. This is based upon the review of the documentation provided through the self-study and during the site visit, as well as information learned during interviews.

Findings should be summarized concisely by the team member in the Evaluator Findings section for each element in the site visit report. Evaluators should not copy and paste language from the COM's self-study into their findings. An evaluator's comments should be written in such a way as to convey their finding of compliance, without expressly using the terms "met" or "not met." Evaluators should not add any recommendations or suggestions to the COM in their findings.

Site visit schedules are developed to allow for most of the site visit report to be completed prior to the team leaving the COM. Most evaluators find it helpful to begin writing their site visit findings from the information provided in the COM's self-study. Beginning the site visit report early will help identify areas that need to be addressed during the site visit interviews.

Post Site Visit Activities

Following the site visit, the team chair, in cooperation with the team members, is responsible for submitting the completed site visit report to accreditation staff. Within two weeks, the site visit team secretary sends the report to the COM for review of the accuracy of the information contained in the report. The COM is given 30 days to comment on the draft report. Following receipt of the COM's comments, the report, the self-study, and the supplemental documentation are forwarded to the COCA for review.

Important Note: At the conclusion of the site visit, evaluators should delete any files downloaded onto their computers in preparation for the site visit.

Site Team Responsibilities

1. Disclose any potential conflict of interest as described in the COCA Conflict of Interest Policy (Appendix A) or the COCA Consultant Policy (Appendix B).
2. Exhibit professionalism at all times:
 - Accept the invitation to serve on the team readily and begin preparations
 - Review the accreditation standards in their entirety with particular attention paid to the standards which you are assigned for the site visit
 - Review all pertinent documents (e.g., self-study report, prior site visit reports, progress reports, annual reports, etc.)
 - Routinely monitor e-mail for communications from staff and other members of the team and respond to inquiries promptly
 - Review the agenda; prepare ahead for an effective and efficient visit
 - Protect confidentiality of the COM, before, during, and after the visit; return documents, notes, etc., to team secretary or destroy them before departing the COM; delete any documents that were created on your computer
 - Do not discuss findings with COM personnel.
 - Direct all document requests through the COCA staff team member. Allow the COM enough time to locate the documents and provide them to the site visit team
 - Dress in business attire
 - Begin and end meetings promptly according to the agenda
 - Exhibit collegiality with teammates and representatives of the COM
 - Promote and maintain peer review perspective
 - Maintain objectivity, consider all perspectives, base conclusions on evidence
 - Practice the best judgment to build team consensus when making decisions on compliance
 - Conduct your review based on the requirements of the standards, not how things are done at your institution
3. Practice effective interviewing techniques

- Formulate and review questions before the interview
- Identify ahead of time the specific individuals to whom the questions will be posted
- Allow the interviewee to talk most of the time
- Be a good listener!
- Provide the opportunity for the interviewee to describe the goals of the COM and the strengths and weaknesses in meeting the goals
- Ask questions that will verify documentation reviewed
- Request clarification on issues of concern
- Always practice objectivity during the interview process
- Acknowledge the autonomy of the COM in developing policies and procedures required to meet its mission and comply with the accreditation standards
- Allow enough interview time to elicit responses that provide all information necessary to determine compliance with the standards under review

4. Participate willingly in team planning and discussions

- Participate in team discussions during the site visit
- Listen to all team members' reports on information gathered
- Review preliminary conclusions from current findings
- Request additional interviews, if necessary
- Request additional documents for review and verification, if necessary
- Build consensus – work to develop agreement on current findings and standards compliance
- Stay objective; support the peer review process
- Alert the team chair and team secretary of issues requiring attention.

5. Apply skilled approaches to communication when writing the report

- Concisely report your findings on the site visit report for each of the assigned standards and elements. When an element is found to not be met, be sure to provide sufficient detail to explain this outcome.
- List documents and web links referenced or reviewed during the visit on the site visit report, being sure to include those documents which were requested from the COM beyond what had originally been provided in the self-study.
- Consult with team secretary for questions on reporting site-visit findings on the site visit report.

Confidentiality

The proper care and handling of confidential information and documents provided through the course of executing one's responsibilities as a COCA evaluator must be acknowledged and adhered to. Any information provided as part of one's participation in a site visit shall not be shared, forwarded, copied, distributed or discussed with individuals outside of its intended audience and the purpose for which it was provided. Nor should an individual utilize confidential information for their personal advantage or the advantage of any other entity. (See the COCA Confidentiality and Conflict of Interest Policy for additional information.)

Conflict of Interest

With respect to conflicts of interest, the policy of the COCA shall be to err on the side of precaution to safeguard the integrity of the COCA and the site review process. COCA evaluators should be sensitive not only to the existence of a conflict of interest, but also to the possible appearance of improper conduct or conflict of interest where no conflict of interest may exist.

In simplest terms, a conflict of interest arises where an individual 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 include:

- A business or financial relationship with an individual or program under consideration
- A direct familial relationship with an individual under consideration or with an officer of an entity under consideration
- An employment, student, or consulting (current or within the last 5 years) relationship with an entity under consideration
- Employment, student, or other relationship with a competitor of a program under consideration

The primary responsibility for disclosure of a potential conflict of interest rests with the individual COCA evaluator. COCA evaluators must report a potential conflict of interest to the COCA staff member or site visit team chair prior to any meeting or assignment to participate in a COCA site review. The determination if a conflict of interest exists and any required resolution (e.g., recusal from a discussion or survey activity) will be determined by the COCA Chair or the COCA Secretary, or the team secretary while on a site visit.

Evaluators Serving as Consultants

Past and current COCA site evaluators may act, serve, or be retained as consultants as outlined in the Consultant Policy. However, Evaluators must self-report any past or present consultative relationships to the COCA according to the guidelines outlined in the COCA Conflict-of-Interest Policy.

Individuals who work with and are reimbursed by a COM as visiting professors, speakers at COM educational activities (e.g., CME, conferences, lectures), faculty development programs, and other similar scholastic events that are not related to COCA accreditation are not considered consultants under this policy.

Travel Arrangements and Expense Reimbursement

Travel Planning

Evaluators are responsible for making their travel arrangements to the site visit location. The team secretary will provide information about the closest airport to the COM and an approximate arrival time to coordinate ground transportation from the airport to the hotel.

Evaluators must use the official AOA's travel agency to book their travel. The site visit team secretary will provide instructions. If that is not possible, contact the team secretary to make alternate arrangements.

Guidelines for travel arrangements:

- It is recommended you make the reservation 30 days before the site visit.
- It is recommended you select direct flights when possible.
- If you intend to drive to the site or use an alternate method of transportation, the COCA reimburse the cost of travel at the IRS-approved mileage reimbursement rate no more than the fee for a coach airline ticket from your home and the closest airport to the COM.
- If you are traveling to an alternate location after the site visit, the COCA will only reimburse you for a round trip coach ticket from your home to the COM.
- The AOA does not pay for first class or upgraded seats.
- The AOA will pay for one checked bag.
- The AOA will not pay for canceled flights or rebooking fees unless rebooking is required due to a change in the site visit schedule. If you must change or cancel your flight, please contact the site visit team secretary.
- Airfares are direct billed to the AOA. You must submit your itinerary to the team secretary, but do not include the fee on your expense voucher unless you paid for the ticket yourself.
- Rental cars may not be used unless prior approval is received from the team secretary.

Hotel Accommodations

The COM is responsible for making hotel arrangements for all members of the team. COMs are directed to have hotel room costs directly billed to the COM. Team members should check on this arrangement when they check in at the hotel. Incidentals, such as snacks or breakfast, may be billed to the team member. Team members will receive information on the hotel accommodations from the site visit team secretary prior to the site visit.

Meal Arrangements

Depending on whether the host hotel provides breakfast, the COM may provide breakfast for the team and the COM will provide lunch for those team members. Team members should inform the team secretary of any special dietary requirements. The team secretary will make dinner arrangements for the team.

Reimbursement Policies

Site visit team members must submit expense voucher to COCA via predoc@osteopathic.org within two weeks of the conclusion of the visit.

AOA reimbursement policies provide for reimbursement for each day of the site visit and any travel days to and from the site visit. An honorarium is provided for each team member for each day of the site visit (including the travel days). An honorarium is not provided for time spent preparing for a site visit or for work completed after the visit. Meals, ground transportation, and other expenses are reimbursed according to the AOA's travel policy which will be provided by the team secretary.

Evaluators must submit their expense voucher, along with any relevant receipts, to the Accreditation Department within two weeks after the site visit.