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Commission on Osteopathic College Accreditation 2023 Continuing Accreditation Standards Crosswalk

The following guidelines were developed to provide clarity on the requirements of the Commission on Osteopathic College Accreditation (COCA) Standards. Each Standard and Element is defined with an accompanying guideline to help clarify requirements, a list of evidentiary submission requirements, when required to be submitted, and a list of interviews that may take place during a site visit.

This information is provided for guidance purposes only. Decisions regarding compliance with COCA standards are made by the Commission following a review of all relevant materials.

COCA 2023 Continuing Standards Crosswalk

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Standard 1: Mission and Governance

A College of Osteopathic Medicine (COM) must have a written statement of mission and goals for the osteopathic medical education program, conduct ongoing planning and assessment, and have written bylaws that describe an effective organizational structure and governance processes. In the conduct of all internal and external activities the COM must demonstrate integrity through its consistent and documented adherence to fair, impartial, and effective processes, policies, and practices.

Element 1.1: Program Mission (CORE)

A COM must have a mission statement that: 1) explains the overall purpose of the COM's program; and 2) serves as a guide for program planning and assessment. A COM must include a commitment to advancing diversity, equity, and inclusion (DEI) in its mission, values, vision, goals, or objectives. Where the COM is part of a larger educational institution or parent institution, the COM's mission must be consistent with the institution's mission. The COM must review its program mission at least once every five years and upon review, if the COM deems it to be appropriate to do so, the COM should revise its mission to meet the COM's growth and continued development. The COM must consider the input of its students, faculty, and staff, with representation from all additional locations and branch campuses (unless the branch has a separate mission) when reviewing and revising its mission and any value, vision, goal, or objective statements.

Guideline: The mission statement should be clear and concise and provide in a few short sentences the COM's purpose. The mission statement must be communicated to faculty, staff, students, and other communities of interest. The mission statement must be reviewed every five years and revised as necessary with the input of faculty, staff, and students.

Documents to review for verifying compliance

- 1. COM program mission
- 2. Vision, and goals or objectives
- 3. Public link to where mission statement, vision, objectives are published.
- 4. Parent institution's mission statement (if applicable)
- 5. Documentation of mission review and revision process and its participants
- 6. Meeting minutes documenting most recent governing board approval of the COM's mission

Interviews to conduct for verifying compliance

President/CEO

Dean/Chief Academic Officer

Board Members

Senior Leadership

Element 1.2: Strategic Plan

A COM must produce and publish a current strategic plan addressing all core aspects of the COM's mission, including the advancement of diversity, equity, and inclusion (DEI). The strategic plan must include all additional locations. The strategic plan may include a COM's branch campus, or a branch campus may have a separate strategic plan. Students, faculty, and staff, from each additional location and branch campus (unless the branch has its own plan) must be included in the strategic plan development, review, and revision.

Guideline: The strategic plan should align with the COM's mission and include discernable goals and a means of assessing achievement of those goals. The COM's DEI objectives should be included in its strategic plan. The COM must publish its strategic plan on a public facing website (not behind a password protected firewall). A strategic plan should be periodically reviewed by students, faculty, and staff.

Documents to review for verifying compliance

- 1. COM's strategic plan
- 2. A list of individuals involved in the strategic plan's creation or revision.
- 3. A public link to where the strategic plan is published.

Interviews to conduct for verifying compliance

President/CEO

Dean/Chief Academic Officer

Board Members

Faculty

Staff

Students

Element 1.3: Licensing and Regional/Institutional Accreditation (CORE)

A COM must maintain in effect any charter, licenses, or approvals required for it to function as an institution of higher education, including the provision of degree programs beyond the secondary level.

The parent/sponsoring institution under which the COM operates (or the independent COM itself) must be recognized by an institutional accrediting agency that is recognized by the United States Department of Education (USDE). A COM must report to the COCA any adverse actions that are taken against it or its parent institution by its institutional accreditor within five business days of notification of such action.

Any COM, branch campus, or additional location on or adjacent to another institution's campus must clearly state that the DO degree is not affiliated with the host institution.

Guideline: The charters/licenses/letters of approval must be current. Any adverse actions should be noted, and the COM must provide a plan to comply with the stated requirements. COMs that conduct core or required clinical rotations outside of their state of licensure must demonstrate the required authorization for their students to train in those states. The COM must publish its accreditation status on a public facing website. Charters/licenses/approvals should be verified for all additional locations and branch campuses.

Documents to review for verifying compliance

- 1. A copy of the charter, license, or letter of approval from all agencies issuing such approvals
- 2. A public link to where the most recent institutional accreditation documents are published.

Interviews to conduct for verifying compliance

President/CEO Chief Academic Officer/Dean

Element 1.4: Governance & Program Policies (CORE)

A COM must have a governing body or be part of a parent institution with a governing body which defines COM's mission, approves the strategic plan, provides financial oversight, and approves requisite policies. The majority of the members of the governing body must be independent of financial interest/benefit from the COM. The COM must publish and abide by policies regarding conflict of interest for board members, employees, and institutionally employed faculty; due process for employees, students, and credentialed instructional staff; confidentiality of employee, student records and medical records; fiscal management; and ethics. The American Osteopathic Association Code of Ethics must be incorporated (written into) the ethics policy.

Guideline: Governing documents should reflect a deliberative and informed process which abides by the policies provided. During interviews, governing body members should be able to affirm the types of information they receive from COM leadership. Additional locations must have the same policies as the parent COM. Branch campuses may have different policies than the parent COM.

Documents to review for verifying compliance

- 1. The bylaws of the governing body
- 2. A list of members, including titles, of the body
- 3. Policies for:
 - a. Conflict of interest for board members, employees, and institutionally employed faculty.
 - b.Due process for all employees, students, faculty, and credentialed instructional staff.
 - c. Confidentiality of student and employee records
 - d.fiscal management and accountability
 - e. Ethics, incorporating the AOA Code of Ethics.
- 4. Copy of annually signed COI statement for governing body members.

Interviews to conduct for verifying compliance

President/CEO, Chief Academic Officer/Dean, Board of Trustees

Students and Faculty (due process policies)

Element 1.5a: Non-Discrimination (CORE)

A COM must have a policy of non-discrimination and anti-sexual harassment with regard to students, administrative personnel, faculty, and staff, based on race, ethnicity, color, sex, sexual orientation, gender, gender identity, national origin, age, disability, and religion. This must apply to all COM actions.

A COM, or its parent institution, must develop a mechanism for students, faculty, and staff to report alleged discrimination incidents and track their resolution.

Guideline: The COM's non-discrimination policy must specifically reference each of the protected classes listed in this element. The process for filing and adjudicating any complaint regarding discrimination alleged under this policy must be fully described within the policy. Staff should be able to articulate the process for reviewing allegations of discrimination.

Documents to review for verifying compliance

- 1. The non-discrimination/anti-harassment policy
- 2. A public link to the non-discrimination policy
- 3. A description and flowchart of the process for reporting alleged incidents of discrimination or sexual harassment and tracking their resolution.

Interviews to conduct for verifying compliance

Registrar

Admissions Leadership

DEI Leader

HR leadership

Associate/Assistant Dean

Director of Faculty Affairs

Element 1.5b: Non-Discrimination for Faith-Based Institutions (CORE)

The COCA respects the religious mission of faith-based schools. A COM having a religious affiliation or purpose must have a policy of non-discrimination anti-sexual harassment with regard to students, administrative personnel, faculty, and staff but need not apply all selection criteria listed in Element 1.5a if each omission is directly related to that affiliation or purpose, and so long as the policies are made known to applicants and the public and do not contravene any other COCA standard. This must apply to all COM actions at all campus locations.

A COM, or its parent institution, must develop a mechanism for students, faculty, and staff to report alleged discrimination incidents and track their resolution as appropriate for the COM's faith-based mission.

Guideline: The COM's non-discrimination policy must specifically reference each of the protected classes listed in this element except for those classes omitted based on the COM's faith-based mission. COMs must demonstrate that the omitted classes are directly related to their affiliation or purpose. The faith-based mission and policies should be publicly available online. The process for filing and adjudicating any complaint regarding discrimination alleged under this policy must be fully described within the policy or language.

Documents to review for verifying compliance

- 1. The faith-based mission of the COM
- 2. The non-discrimination/anti-harassment policy
- 3. A public link to where the policy and procedures are published.
- 4. A description and flowchart of the process for reporting alleged incidents of discrimination and tracking their resolution

Interviews to conduct for verifying compliance

Registrar

Admissions Leadership

DEI Leader

HR leadership

Associate/Assistant Dean

Director of Faculty Affairs

Element 1.6: Degree-Granting Body

The governing body of the COM and/or parent institution must confer the degree Doctor of Osteopathic Medicine (DO) upon those students who have satisfactorily completed the requirements for graduation and have been recommended for graduation by the COM's faculty.

Guideline: The governing body's bylaws should outline how degrees are conferred to students. The COM's policies should indicate who is responsible for degree conferral. The minutes from the most recent faculty association (or approval body) meeting where degrees were conferred must be provided. COCA policies prohibit awarding honorary Doctor of Osteopathic Medicine degrees.

Documents to review for verifying compliance

- 1. The bylaws or governing documents that demonstrate the conferral of degree.
- 2. The COM policy that demonstrates that the faculty association (or approved body) must recommend candidates for graduation.
- 3. Minutes from the faculty association meeting where this occurred for the most recent graduates.

Interviews to conduct for verifying compliance

Board of Trustees

Promotion Committee

Faculty Association (or the approved body)

Standard 2: Leadership and Administration

A COM must have leadership and senior administrative staff with the knowledge, skills, time, and support necessary to achieve the goals of the osteopathic medical education program and to ensure the functional integration of all programmatic components.

Element 2.1: Dean Qualifications (CORE)

A COM and any branch campus must have a dean who is qualified for the position by education, training, and experience to provide effective leadership in education, scholarly activity, and patient care. The dean must have:

- 1. An earned DO degree from a COCA-accredited college of osteopathic medicine;
- 2. An unrestricted medical license at some time in their career, free of disciplinary actions or sanctions while licensed;
- 3. AOA or ABMS board certification at some time in their career; and
- 4. At least five years of proven experience within the last ten years in academic leadership roles that includes budget management authority.

Guideline: The extent of the dean's leadership activities in previous positions should be determined when assessing the dean's experience. The dean should have knowledge of and experience in higher education, critical decision-making, financial management, and directing high functioning teams to create and execute strategic initiatives. A branch campus must have a dean that meets these requirements.

Documents to review for verifying compliance

- 1. Dean's diploma from COCA-accredited college of osteopathic medicine.
- 2. Dean's current or most recent medical license
- 3. Dean's AOA or ABMS board certification
- 4. Dean's current and complete CV
- 5. Dean's job description (with evidence of budgetary authority)
- 6. Dean's current Practitioner Profile report from the Federation Credentials Verification Service.

Interviews to conduct for verifying compliance

Dean

President or Provost

Element 2.2: Full Time Dean (CORE)

The dean must be employed full-time by the COM and/or its parent institution.

In carrying out the full-time responsibilities of the dean, the dean of a COM is administratively responsible for the conduct and quality of the medical education program and for ensuring the adequacy of faculty at the COM and each of its additional locations.

This element requires a dean to be employed full-time without any conflicting, secondary employment. Any secondary employment for which remuneration is given must be: 1) under the auspices of the COM, or its parent institution's authorization; and 2) not in conflict with the time commitments required to carry out the full-time responsibilities of the dean.

Guideline: Secondary activities, including clinical practice and research, must not detract from the dean's attentiveness and availability to the responsibilities customarily accorded to the Chief Academic Officer of the degree program.

	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1.	Employment contract (compensation redacted) demonstrating that the dean is employed full time.	Dean President or Provost

Element 2.3: Academic and Administrative Leadership

A COM and any branch campus must have academic and administrative leadership to accomplish the COM's mission. Assistant/associate deans must have proven experience in teaching, educational design and evaluation, scholarly activity, and academic leadership in a medical education setting appropriate for the position.

A COM and any branch campus must have at least one leadership position at an assistant/associate dean level or higher with oversight of the entire clinical education curriculum and assessment.

Each additional location must have an osteopathic physician at the level of associate dean or higher with responsibility for the day-to-day operations at the additional location who reports directly to the dean at the main campus.

Guideline: The organization chart must indicate that the dean has oversight authority over the COM. For assistant/associate deans reporting to the dean, compare their credentials to their job descriptions to determine their experience and preparation. Interviews will reveal the alignment with position titles held in the past with actual scope of experience.

For COMs with an additional location, each location must employ a DO at the level of associate dean or higher (may hold any title, including but not limited to Dean or Campus Dean), with responsibility for the day-to-day operations at the additional location who reports directly to the Dean at the main campus.

A COM dean may have their office at the main campus or an additional location.

Documents to review for verifying compliance

- 1. An organizational chart that shows the COM's leadership positions, names, and reporting structure.
- 2. The job description for each member of the administrative leadership team.
- 3. The CV for each member of the administrative leadership team.
- 4. The employee's medical license (if a DO or MD).
- 5. The employee's AOA or ABMS board certification.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Deans

Element 2.4: Accreditation Standard Complaint Policies and Procedures (CORE)

A COM and any branch campus must publish policies and procedures that include a confidential accreditation standard complaint resolution process that includes a description of how these complaints are filed with the COM, resolved through an adjudication process, without retaliation, and maintained through the COM's records retention system. The accreditation standard complaint filing process must also include a process for filing confidential complaints with the COCA and the contact information of the COCA.

Guideline: The complaint policies and procedures must include how the complainant's confidentiality is maintained throughout the complaint process, a description of how complaints are adjudicated, and a policy of non-retaliation. The element does not require anonymity. The procedures must be posted on a public webpage. Faculty and staff should be able to describe the COM's complaint procedures and how students are informed of this policy. The COM's policies must include a statement that complaints may be submitted directly to the COCA and the COCA's contact information must be provided. Samples of complaint, if applicable, should demonstrate how the COM followed its policies to adjudicate and resolve complaints.

Documents to review for verifying compliance

- 1. Policies and procedures regarding accreditation standard complaints and their adjudication including an explanation of how the complainant's confidentiality is maintained throughout the process.
- 2. Sample records of accreditation standard complaints that have been received, adjudicated, and resolved.
- 3. Link to a public webpage where the accreditation standard complaint policies and procedures are published.

Interviews to conduct for verifying compliance

Dean/Associate/Assistant Deans Students Faculty Staff

Element 2.5: Diversity, Equity, and Inclusion (DEI) Leadership (CORE)

A COM and any branch campus or its parent institution must designate an individual with responsibility for oversight of diversity, equity, and inclusion (DEI) initiatives of the COM to the extent permitted by law.

Guideline: This position informs the COM on current statutes and best practices in support of students, faculty, and employees to meet diversity goals in alignment with the COM's mission. A job description can be used to verify responsibilities. The connection between the COM's DEI mission and strategic plan to its related activities and support services should be ascertained.

	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1.	DEI leader's job description	Dean
2.	DEI leader's CV	DEI Leader
		Students
		Faculty and Staff

Standard 3: Finances

A COM must have sufficient financial resources readily available to meet the needs of the COM and to achieve the COM mission, consistent with its projected and authorized student class size.

Element 3.1: Financial Resources (CORE)

A COM and any branch campus must ensure that the financial resources of the school are adequate to sustain a sound program of osteopathic medical education and to accomplish the programmatic and institutional goals. Because of the potential financial consequences, if any COM or its parent institution experiences a change in status regarding its participation in the Title IV programs following its initial establishment of participation, it must notify the COCA.

Guideline: The institution's budget and audited financial statements should reflect sufficient financial resources for the COM to meet its mission. Any outstanding risks such as maturing loans, deteriorating physical facilities, or recurring losses to reserve investments should be identified. A pro-forma or profit or loss statement is not a substitute for an operational budget. The budget should include line items for research and GME support/development, or an explanation should be provided if those expenses are incorporated into other line items.

Documents to review for verifying compliance

- 1. Operational budget (income, revenue sources, and expenses) for the COM, including any additional location, covering at least three years of data.
- 2. Institution's most recent approval to participate in the Title IV student loan program.

<u>Interviews to conduct for verifying compliance</u>

Dean

President

Chief Financial Officer/Comptroller

Associate/Assistant Deans

Department Chairs

Faculty

Title IV Officer

Element 3.2: Financial Planning and Budgeting

A COM and any branch campus must have a budgetary process that is designed to support the mission of the COM, including at any additional locations.

Guideline: The flowchart should depict how department heads and others contribute to the COM's budgeting processes. The flowchart must indicate where the dean is in the budget approval process.

Documents to review for verifying compliance

- 1. A flowchart and timeline demonstrating the budget development process for the budget covering the parent COM and any additional location(s), indicating where the final budget approval occurs and clearly reflecting the dean's role in the process.
- 2. A list of all people with budgetary management and oversight at the COM.

Interviews to conduct for verifying compliance

Dean

President

Chief Financial Officer/Comptroller

Associate/Assistant Deans

Chairs

Element 3.3: Budgetary Authority

A COM or parent institution must provide the dean (and the dean of any branch campus) with the resources and budgetary authority necessary to fulfill their responsibility for the management of the COM.

Guideline: The dean must have authority over direct expenditures for the COM. Some institutions will apportion costs to the COM that are budgeted centrally. If so, the dean should be active in the budgetary discussions that determine those costs along with the formula for distribution of tuition revenues from COM students. The budget flowchart submitted under Element 3.2 must show the Dean at the highest of approval before submission to the parent institution.

Documents to review for verifying compliance

- 1. Current job description demonstrating the dean's budgetary authority for the COM.
- Employment contract (compensation redacted) demonstrating the dean's budgetary authority for the COM.

Interviews to conduct for verifying compliance

Dean
President
Chief Financial Officer/Comptroller
Associate/Assistant Deans
Department Chairs

Element 3.4: Financial Audit (CORE)

A COM or its parent institution must commission an annual independent audit confirming financial viability and provide evidence of resolution of concerns cited in the audit's accompanying management letter.

Guideline: All institutions operating a COM must secure an annual independent audit. Documentation must be provided to demonstrate that the COM has addressed any findings indicated in the management letter.

Documents to review for verifying compliance

- 1. Annual financial statement and audit report for the COM or its parent institution for the latest complete fiscal year.
- 2. Evidence of resolution for any concerns cited in the audit's management letter.

Interviews to conduct for verifying compliance

Chief Financial Officer/Comptroller
Title IV Officer

Standard 4: Facilities

A COM must have sufficient physical facilities, equipment, and resources for clinical, instructional, research, and technological functions at all locations/campuses of the COM. These resources must be readily available and accessible across all COM locations to meet the COM's needs and the needs of the students consistent with the approved class size, allowing the COM to achieve its mission.

Element 4.1: Facilities (CORE)

A COM (and any branch campus) and its additional location must have facilities for the program of instruction that enable the authorized class size of students and faculty to pursue the mission, curriculum content and delivery, and research/scholarly activity of the COM.

A COM (and any branch campus) must have access to facilities for simulation and standardized patient encounters and must demonstrate how the facilities contribute to student achievement of learning outcomes of its curriculum.

A COM (and any branch campus) must assess the adequacy of the core clinical rotation facilities and involve students in the assessment.

The COM must have space available for use by students in a manner intended to support diversity, equity, and inclusion to the extent permitted by law, and must consult with students in the process of establishing such a space.

Guideline: An understanding of the COM's curriculum and instructional design is needed to determine the adequacy of available facilities. Workflow and schedules must be correlated with the class size; capacities of lecture halls and laboratories; and availability of faculty facilitators and workstations in labs, and standardized patient and simulation facilities. Sufficient individual and small group study space must be available. Students, faculty and staff should be able to describe what spaces are intended to provide a supportive environment for students. The COM must demonstrate how students were consulted in establishing this supportive space.

Documents to review for verifying compliance

- 1. Table 4.1, with separate tables for additional locations and branch campuses (if applicable).
- 2. Facility floor plans with designations of how the space will be utilized.
- 3. A description of and indications on floorplans the facilities used for simulation and standardized patient encounters to students.
- 4. A description for how the COM assesses adequacy of core clinical rotation facilities, including how students are involved.
- 5. A description of how the COM assesses the adequacy and efficacy of facilities intended to support diversity, equity, and inclusion, including how students are involved in the assessment.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Deans Facilities/Operations Director Laboratory/Research Director Librarian

Students

Faculty/Staff

Element 4.2: Security and Public Safety

A COM must ensure that adequate security systems are in place and publish and follow policies and procedures for security; student, faculty, and staff safety; and emergency and disaster preparedness at all COM-operated teaching locations and core training sites.

The COM's policy must include methods of communication with students, faculty, and staff at all teaching and training locations.

Guideline: A COM is expected to comply with all local building safety codes. A COM should demonstrate in its policies how it ensures a safe environment during all hours that the COM or offsite rotation facilities are open to students and employees. COMs must make their most recent annual security report publicly available

Documents to review for verifying compliance

- 1. All security and safety policies and procedures and the link to where they're published.
- 2. Most recent report under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, 20 U.S.C. §1092, et al., as amended, and the link to where it is published.

Interviews to conduct for verifying compliance

Security Director Clinical Rotation Site Directors Students Faculty/Staff

Element 4.3: Information Technology

A COM must ensure access to information technology to support its mission at all locations and ensure Wi-Fi availability at all core rotation sites. Students, faculty, and staff must be involved in the assessment of information technology services.

Guideline: Wi-Fi must be available at the main campus and all rotation sites with sufficient bandwidth to accommodate the number of students at the location and planned curricular activities. COMs should have a mechanism to assess adequate Wi-Fi and IT service on campus and at clinical rotation sites. IT assessment reports must include student and faculty input. For COMs operating additional locations with synchronous learning activities, video connectivity should be reliable with opportunity for two-way communication. Help Desk services should be available to assist students and faculty with technology issues.

Documents to review for verifying compliance

- 1. COM's information technology strategic plan.
- 2. A description of student, faculty, and staff involvement in the assessment of information technology services.
- 3. Most recent technology assessment report, including all locations/campuses/and Wi-Fi availability at core clinical rotation sites.

Interviews to conduct for verifying compliance

Association/Assistant Deans
Department Chairs
IT Director
Clinical Rotation Site Directors
Students
Faculty/Staff

Element 4.4: Learning Resources

A COM and any branch campus must ensure students and faculty have access to in-person and electronic learning resources at all campus locations that support pre-clinical and clinical education that achieve program objectives and support the COM's mission.

Guideline: Required learning resources are determined by the curriculum and include more than just access to a library or electronic publications. High fidelity simulators, models for training clinical skills and anatomy, examination and OMM tables, and hand-held ultrasound are examples of resources that may be utilized by the unique curriculum of the COM. COMs with learning resources that are utilized by non-DO students must indicate how the needs of COM students accommodated.

Documents to review for verifying compliance

1. Table 4.4, which describes the COM's learning resources at all campus locations.

Interviews to conduct for verifying compliance

Associate/Assistant Deans
Department Chairs
IT Director
Librarian

Clinical Rotation Site Directors

Students Faculty/Staff

Standard 5: Learning Environment

A COM must ensure that its educational programs at all teaching locations occur in professional, respectful, non-discriminatory, culturally sensitive, and intellectually stimulating academic and clinical environments.

The COM must promote students' attainment of the osteopathic core competencies required of future osteopathic physicians

Element 5.1: Professionalism (CORE)

A COM and any branch campus must ensure that the learning environment of its osteopathic medical education program is conducive to the ongoing development of professional behaviors in its osteopathic medical students, faculty, and staff at all locations and is one in which all individuals are treated with respect.

A COM must have a committee, or other approved body, which oversees professionalism. A branch campus may have its own committee/approved body.

Guideline: The COM should demonstrate how it follows its policies and procedures regarding professionalism and how it adjudicates and resolves issues. This is usually done through a committee or other approved body. The COM must provide the roster and a description and charge of this committee or approved body. The policies and procedures must be publicly published.

Documents to review for verifying compliance

- 1. The COM's professionalism policies and procedures and a link to the webpage on which they're published.
- 2. A roster for the committee or approved body with representations from all campuses that oversees issues of professionalism and ethics.
- 3. A description and charge of the committee or approved body.

Interviews to conduct for verifying compliance

Associate/Assistant Deans Department Chairs Faculty/Staff Students Professionalism Committee

Element 5.2: Diversity

A COM must publish policies on and engage in ongoing, systematic, and focused recruitment and retention activities to the extent permitted by law, to achieve mission-appropriate diversity outcomes among its students, faculty, senior administrative staff, and other relevant members of its academic community.

A COM must include in these activities the use of programs and/or partnerships with other institutions and organizations aimed at achieving diversity among qualified applicants for medical school admission and the evaluation of program and partnership outcomes.

A COM must make available by request three years of student, faculty, and staff demographics, at a minimum including race/ethnicity and gender. The mechanism to request this data must be published and easily identifiable on the COM's website. When applicable, for any value less than ten, the COM should indicate that value as "less than 10" in place of the value.

Guideline: The COM's policies and procedures should describe its strategies for the recruitment and retention of students, faculty, , and staff to support its mission-appropriate diversity goals . Any agreements with partner organizations should describe the goals of the partnership. Events that support those partnerships should be noted. The COM's website should be reviewed to confirm instructions to request demographic information are available.

Documents to review for verifying compliance

- 1. COM's policies that demonstrate its current practice of systematic and focused recruitment and retention activities to achieve mission-appropriate diversity outcomes among its students, faculty, senior administrative staff, and other relevant members of its academic community.
- 2. A description of the COM's programs and partnerships with other institutions and organizations aimed at achieving diversity among qualified applicants for medical school admission and the COM's evaluation of program and partnership outcomes.
- 3. A public webpage where student, faculty, and staff demographics can be requested.

Interviews to conduct for verifying compliance

Dean
Associate/Assistant Deans
Department Chairs
DEI Leader
Admissions Leadership
Faculty/Staff
Students

Element 5.3: Safety, Health, and Wellness

A COM must publish and follow policies and procedures at all campus locations that effectively mitigate student, faculty, and staff exposure to infectious and environmental hazards, provide education on prevention of such exposures, and address procedures for care and treatment after such exposures.

A COM must publish and follow policies related to student, faculty, and staff mental health and wellness, and fatigue mitigation in the clinical learning environment.

Guideline: A COM must publish its safety policies and procedures and demonstrate how its policies are communicated to students, faculty, and staff. It must show that it provides prevention education and addresses procedures for care in the event of an exposure to infectious and environmental hazards. A COM should likewise show how it follows its published policies on mental health and wellness and fatigue mitigation.

Documents to review for verifying compliance

- 1. COM's policies and procedures addressing safety and health issues, and a link to the webpage where this information is published.
- 2. A description of how this information is provided to students, faculty, and staff.

Interviews to conduct for verifying compliance

Associate/Assistant Deans
Department Chairs
Rotation Site Directors
Laboratory Director
Students
Faculty

Element 5.4: Patient Care Supervision (CORE)

A COM must ensure that osteopathic students in clinical learning situations involving patient care are under direct supervision by a licensed health care professional at all times in order to ensure patient safety. The COM must ensure that all supervised activities are within the scope of practice of the supervising health care professional. Students must have clear guidelines on their role in care and the limits of their scope of authority.

Guideline: The COM's policies must address student supervision during the provision of patient care (including telemedicine), ensuring that students in clinical settings are always under direct supervision. Direct Supervision is defined as observation of a student in the clinical learning environment that can occur while the supervisor is physically present with the student and the patient, or when the supervisor allows the student to interact with the patient without being present but is immediately available. In both cases the supervisor must physically see the patient during the key portions of the interaction and is responsible for student and patient safety. Supervised activities must be within the scope of practice of the supervising health care professional. The COM must explain how this information is provided to students, faculty, and staff.

Documents to review for verifying compliance

- 1. COM's policies addressing student supervision during the provision of patient care, including those on telemedicine, if applicable.
- 2. A description of how this information is provided to students.

Interviews to conduct for verifying compliance

Clinical Associate Dean Clinical Department Chairs Rotation Site Directors Students

Element 5.5: Office of Diversity, Equity, and Inclusion (CORE)

A COM and any branch campus, or its parent institution, must have an Office of Diversity, Equity, and Inclusion (DEI) (or similar) to the extent permitted by law that supports students, faculty, and staff, and the COM's efforts to promote recruitment, retention, and success of its students, faculty, and staff throughout the osteopathic medical education program. The DEI Office must have a strategic plan that is developed with input from students, faculty, and staff

Guideline: The COM must demonstrate how the DEI Office (or similar) engaged students, faculty, and staff in the development of its strategic plan that includes discernable goals and a means of assessing achievement of those goals. This strategic plan can be a part of the COM's or parent institution's strategic plan. The COM should demonstrate its efforts to promote recruitment, retention, and success of its students, faculty, and staff. Personnel should be able to discuss how the operations of this office are integrated with other departments within the COM.

Documents to review for verifying compliance

- 1. COM's DEI Office's strategic plan.
- 2. A description of student, faculty, and staff involvement in its development and review.

Interviews to conduct for verifying compliance

Dean DEI Leader Students Faculty Staff

Standard 6: Curriculum

The faculty of a COM must define how the students will achieve the educational program objectives, including osteopathic core competencies, and is responsible for the detailed design and implementation of the components of a curriculum that enables its students to achieve those competencies and objectives. Educational program objectives are statements of the knowledge, skills, behaviors, and attitudes that osteopathic medical students are expected to demonstrate as evidence of their achievement prior to successful completion of the program.

The faculty of a COM must periodically and regularly review and revise the COM's curriculum and evaluate the COM's educational program to ensure that the quality of the program meets the current standards of osteopathic core competencies and that students achieve all program objectives and participate in required clinical training experiences and environments.

An additional location must offer at least 50% of the same curriculum as its parent campus. All design, development, and management of the curriculum must include representation of students, faculty, and staff from the additional location.

The curriculum at the branch campus may be the same or different as the curriculum at the parent COM but the dean and leadership at the branch campus is responsible for developing and managing the curriculum. If the curriculum at a branch is different than the curriculum at the parent COM, provide the following information requested in the following elements for the branch campus.

Element 6.1: Curriculum Design and Management (CORE)

A COM and any branch campus must have in place an approved body (e.g., curriculum committee) that exercises collective responsibility for the education program as a whole, and has responsibility for the development, management, evaluation, and enhancement of the curriculum. This committee must include student and faculty representation from the pre-clinical and clinical education years, including representation from any additional campus locations. The curriculum must ensure that students attain the skills, including osteopathic core competencies, interprofessional education and humanistic skills, necessary to demonstrate GME readiness and meet the mission of the COM.

Guideline: The Curriculum Committee must include faculty and students from any additional locations, if applicable. A branch campus must have its own Curriculum Committee. Meeting minutes of the Curriculum Committee should demonstrate regular participation by students and faculty in critical decision making that includes determination of curriculum content, instructional methods, and assessment strategies appropriate for the learning objectives. The committee should be receiving performance and evaluation data to inform curricular modifications. Students must be voting members of the curriculum committee and should attend meetings regularly. The COM should demonstrate that it is assuring that its curriculum is adequately preparing students for graduation, COMLEX-USA exams, and GME.

Documents to review for verifying compliance

- 1. The charge and responsibility of the curriculum committee
- 2. A roster of the current members of curriculum committee and their titles
- 3. A list of meeting dates and meeting minutes for the past academic year.
- 4. Examples of enhancements in the curriculum resulting from continuous quality improvement.

Interviews to conduct for verifying compliance

Dean
Associate/Assistant Deans
Department Chairs
Course Directors
Curriculum Committee
Students
Faculty

Element 6.2: Programmatic Level Educational Objectives (CORE)

A COM and any branch campus must define and make all programmatic level educational objectives known to students, faculty, and others with responsibility for student education and assessment.

Guideline: The COM must state what it seeks to accomplish in offering its Doctor of Osteopathic Medicine degree program. Programmatic objectives must clearly articulate the broad knowledge and skills graduates of the program will have acquired in earning their degree. These objectives should align with the mission of the COM and inform the deliberations of the Curriculum Committee. The COM must verify how these objectives are communicated to students, faculty, and staff, and demonstrate how achievement of the program-level objectives is assessed and used for program improvement.

Documents to	review	for	verify	ying	comp	oliance

1. The programmatic level educational objectives and the link to the public webpage to where they are published.

Interviews to conduct for verifying compliance

Associate/Assistant Deans

Department Chairs
Course Directors

Curriculum Committee

Students

Faculty

Element 6.3: Maximum Length of Completion

A COM and any branch campus must have a policy that requires that each single degree student completes the DO degree within 150% of the standard time to achieve the degree (six years following matriculation) and describes any exceptions to the 150% time limit.

Guideline: Students are expected to complete the single degree program within six years of initial matriculation for programs that are designed for completion in four years. The dean may grant exceptions to this requirement for students with required military commitments, extended FMLA, or other reasons at their discretion. All exceptions must be documented and provided to the COCA on request. Upon transferring to a new COM, the time spent in a previous osteopathic medical education program does not count towards a student's six years at the current COM.

Documents to review for verifying compliance

- 1. The policy that describes that single degree DO students must complete their educational program within the 150% time limit.
- 2. Provide the link to the public webpage where this policy is published.
- 3. Provide a list that identifies any single degree student(s) who graduated beyond the 150% of the standard time allowed that includes a detailed explanation as to the reason for allowing the student(s) to graduate past the 150% of the standard time.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Deans

Students

Registrar

Element 6.4: Osteopathic Core Competencies (CORE)

A COM and any branch campus must teach and educate students to ensure the development of the seven osteopathic core competencies of medical knowledge, patient care, communication, professionalism, practice-based learning, systems-based practice, and osteopathic principles and practice/osteopathic manipulative treatment.

Guideline: The COM's curriculum model must demonstrate pedagogic validity and specifically address each of the osteopathic core competencies. The curriculum map can take many forms but must clearly identify where each of the seven core competencies are delivered and assessed in each year of the curriculum.

Documents to review for verifying compliance

- 1. A description of the COM's delivery of its curriculum including teaching and educating its students to ensure the development of the seven osteopathic core competencies of medical knowledge, patient care, communication, professionalism, practice-based learning, systems-based practice, and osteopathic principles and practice/osteopathic manipulative treatment.
- 2. A curriculum map that demonstrates where the osteopathic core competencies are delivered. The same curriculum map may be used in Elements 6.4-6.8 and Element 6.12.

Interviews to conduct for verifying compliance

Associate/Assistant Deans
Department Chairs
Course Directors
Curriculum Committee
Students
Faculty

Element 6.5: Scientific Method

A COM and any branch campus must ensure that the curriculum includes instruction in the scientific method including data collection to test and verify hypotheses or address questions regarding biomedical phenomena and in the basic scientific and ethical principles of clinical and translational research. The curriculum must include the methods by which such research is conducted, evaluated, explained to patients who are part of clinical studies, and applied to patient care.

Guideline: Scientific method content may be offered en bloc within a single course or individual elements may be identified on the curriculum map as occurring at various times throughout the degree program. All students must receive this instruction with uniform assessment of learning.

Documents to review for verifying compliance

- 1. A description of the COM's delivery of its curriculum including instruction in the scientific method
- 2. A curriculum map that demonstrates how the content of these courses is delivered.

Interviews to conduct for verifying compliance

Associate/Assistant Deans Department Chairs Course Directors Curriculum Committee Students Faculty

Element 6.6: Principles of Osteopathic Medicine (CORE)

In each year of the curriculum, a COM and any branch campus must provide each student with instruction in osteopathic principles and practice (OPP), including both observation and hands-on application of osteopathic manipulative medicine (OMM) supervised by COM-credentialed DO or MD.

Guideline: The COM must provide evidence that discreet learning activities (facilitated labs, workshops, clinical encounters, and hands-on training) are conducted in each year of the curriculum with participation required of every student. Faculty and senior academic leadership should be able to discuss how the effectiveness of OPP/OMM instruction is assessed and the process for making necessary changes to the curriculum. A COM may use non-DO/MD teaching assistants for hands-on training but all hands-on instruction must be supervised by a COM-credentialed DO or MD.

Documents to review for verifying compliance

- 1. A description of the COM's delivery of its OPP and OMM curricula throughout the four-year curriculum.
- 2. A curriculum map that demonstrates how the content of these courses is delivered.

Interviews to conduct for verifying compliance

Dean Associate/Assistant Deans OMM Department Chair Curriculum Committee Students OMM/OPP Faculty

Element 6.7: Self-Directed Learning

A COM and any branch campus must ensure that the curriculum includes self-directed learning experiences and time for independent study to allow students to develop skills for lifelong learning. Self-directed learning includes students' self-assessment of learning needs; independent identification, analysis, and synthesis of relevant information; and appraisal of the credibility of sources of information.

Guideline: Self-directed learning is not just a blank space in the curriculum map or schedule for study but involves the student taking the initiative and responsibility for their own learning. The curriculum must identify content for which the COM provides learning objectives and scheduled time for students to accomplish knowledge creation and acquisition (guided discovery). The COM must include this content in its assessment of student learning and may provide opportunities for knowledge application through classroom or small group exercises.

Documents to review for verifying compliance

- 1. A description of the COM's delivery of its curriculum self-directed learning experiences and time for independent study.
- 3. A curriculum map that demonstrates how the content of these courses is delivered.

Interviews to conduct for verifying compliance

Dean Associate/Assistant Deans Department Chairs Curriculum Committee Students Faculty

Element 6.8: Interprofessional Education for Collaborative Practice (CORE)

In each year of the curriculum, a COM and any branch campus must ensure that the core curriculum prepares osteopathic medical students to function collaboratively on health care teams, adhering to the Interprofessional Education Collaborative (IPEC) core competencies, by providing learning experiences in academic and/or clinical environments that permit interaction with students enrolled in other health professions degree programs or other health professionals.

Guideline: Students are required to have formal interaction with other health professionals. A prescribed curricular requirement must appear in each year of the curriculum. Pre-clinical years are usually on-campus activities with allied health students. Clinical years may satisfy this requirement with scheduled group activities on-campus or at rotation sites in each year that brings students together with allied health students/professionals.

Documents to review for verifying compliance

- 1. A description of the COM's delivery of its curriculum, which includes the COM's preparation of students to function collaboratively on health care teams, adhering to the IPEC core competencies.
- 2. A curriculum map that demonstrates how the content of these courses is delivered.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Deans

Department Chairs

Director of IPE

Curriculum Committee

Students

Faculty

Element 6.9: Clinical Education (CORE)

A COM must:

- 1. Describe how clinical skills are taught and assessed throughout its curriculum;
- 2. Define eligibility requirements, including clinical skills, for a student to enter clinical rotations;
- 3. Define its core clinical rotations, core clinical rotations must include family medicine, internal medicine, general surgery, and pediatrics (all core clinical rotations must be a minimum of four weeks long and must include in-person patient care);
- 4. Define its required clinical rotations, required clinical rotations must include psychiatry, obstetrics and gynecology, and emergency medicine (all required clinical rotations must be a minimum of four weeks long and must include in-person patient care);

Note: Critical care medicine can be substituted for emergency medicine.

Note: Psychiatry and obstetrics and gynecology will change from a required to a core rotation by July 1, 2027.

- 5. Define the types of patients and clinical conditions that osteopathic medical students are required to encounter, the clinical skills to be performed by the students, the appropriate clinical setting for these experiences, and the expected levels of student responsibilities;
- 6. Provide clinical education rotations, including demonstration of adequate faculty, for the three-year rolling average of the number of students eligible to enter core and required rotations for the first time, students repeating core and required rotations, and off-cycle students;
- 7. Have published policies and procedures (protocols) addressing methodologies by which students can satisfactorily complete, including remediation activities, the clinical education curriculum, including standardized/simulated and supervised patient encounters; and
- 8. Provide executed affiliation agreements that support the clinical educational experience for its students.

Note: The distinction between core rotations and required rotations is that core rotations must be taught in the third year of the curriculum by the faculty who hold (or have held) board certification, or be board eligible, in the listed specialty. These stipulations do not apply to required rotations.

Guideline: The COM's policy must describe how students advance to clinical rotations (e.g., course completion, COMLEX Level 1 passage, other unique requirements of the COM). A clerkship manual must provide all common requirements, policies, and procedures for successfully completing clinical rotations. Each core and required rotation must have a syllabus that describes the conduct of the rotation and all outcomes-based learning objectives to be acquired and generally detail the scope of patient presentations or diagnoses to be encountered. Affiliation agreements must be current and executed with regard to how clerkships are conducted at the individual affiliates. Documentation provided by the COM and corroborated through interviews with affiliates should allow an accurate estimation of the capacity for core and required clerkships in each specialty. The COM must describe its procedures for accommodating students when planned rotation sites become unavailable unexpectedly.

Documents to review for verifying compliance

- 1. A COM-approved affiliation agreement.
- 2. Documents that demonstrate the acceptance of the COM's students to participate the affiliate sites, including all executed affiliation agreements.
- 3. The definition of a student eligible to enter clinical rotations.
- 4. Documentation that lists core third- and fourth- year rotations.
- 5. Sample syllabi for all core clinical rotations.
- 6. Evidence that core and required core clinical rotations are successfully completed by every student.
- 7. Policies and procedures demonstrating how clinical education is delivered to all students at the COM.
- 8. Table 6.9a detailing student population eligible to participate in clinical rotations.
- 9. Table 6.9b demonstrating adequacy of core clinical rotation capacity.
- 10. A contingency plan for all core rotations indicating how students will be placed in clinical education in the event of opportunities are no longer available.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Dean of Clinical Education Clinical Department Chairs Curriculum Committee Clinical Rotation Site Directors/Preceptors Students

Element 6.10: Clinical Experience

A COM and any branch campus must ensure that each student's rotations prior to the fourth-year clinical clerkships include the following experiences: 1) at least one rotation conducted in a health care setting in which the student works with resident physicians currently enrolled in an accredited program of graduate medical education; 2) at least one rotation under the supervision of an osteopathic physician; and 3) more than one rotation in an in-patient setting.

Guideline: Every student must receive each of the required rotation experiences as documented through the COM reporting and through interviews with administrative leadership and third- and fourth-year students.

Documents to review for verifying compliance

- 1. A de-identified document showing how the most recent cohort of students received the required clinical experiences prior to their fourth-year clinical clerkships from the system used by the COM to track compliance with these requirements.
- A description of the process the COM uses to ensure students receive the required clinical rotation experiences prior to their fourth-year clinical clerkships.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Dean of Clinical Education Clinical Department Chairs Curriculum Committee Clinical Rotation Site Directors/Preceptors Third and fourth-year Students on campus and on the clinical site.

Element 6.11: Comparability across Clinical Education Sites

A COM and any branch campus must ensure that the curriculum includes comparable educational experiences and equivalent methods of assessment across all core and required clinical educational sites where students learn, ensuring all students achieve similar outcomes based on educational learning objectives. This comparison of comparability must include a statistical analysis.

Guideline: Evidence of comparability should include collection by the COM of student logs for each core and required rotation. Other data sources include end of rotation evaluations completed by students and site visit surveys completed by staff. A COM must complete an analysis that indicates if any meaningful statistical difference in outcomes exists between rotation sites. The COM must describe any corrective action taken or planned as a result of a previous comparability analysis.

Documents to review for verifying compliance

- 1. Policies and procedures describing how student outcomes at clinical educational sites are reviewed and utilized in the determination of the comparability of outcome of the clinical experiences.
- 2. The most recent report, including a statistical analysis, assessing student outcomes across clinical education sites, describing plans to address any issues found.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Dean of Clinical Education Clinical Department Chairs Clinical Rotation Site Directors/Preceptors Students

Element 6.12: Diversity, Equity, and Inclusion Curriculum (CORE)

A COM must incorporate diversity, equity, and inclusion into its curriculum to the extent permitted by law.

Guideline: Appliable course syllabi and the curriculum map to must document the incorporation of DEI-related topics in the curriculum. This may include topics in health disparities, health equity, or health care issues that impact certain populations. Expected learning outcomes must be defined with a description of how they are assessed.

Documents to review for verifying compliance

- 1. A description of the COM's curriculum that includes issues related to diversity, equity, and inclusion.
- 2. A curriculum map demonstrating where the content of these courses is delivered.

Interviews to conduct for verifying compliance

Curriculum Committee
DEI Leader
Students
Faculty

Standard 7: Faculty and Staff

The faculty members at a COM must be qualified through their education, training, experience, and continuing professional development and provide the leadership and support necessary to attain the institution's educational, research, and service goals.

A COM must ensure that its medical education program includes a comprehensive, fair, and uniform system of formative and summative medical student assessment and protects medical students' and patients' safety by ensuring that all persons who teach, supervise, and/or assess medical students are adequately prepared for those responsibilities.

Element 7.1: Faculty and Staff Resources and Qualifications (CORE)

At all educational teaching sites, including affiliated sites, a COM must have sufficient faculty and clinical staff resources to achieve the program mission, including part time and adjunct faculty, and preceptors who are appropriately trained and credentialed. The physician faculty, in the patient care environment at core rotation sites, must hold current medical licensure and have had AOA or ABMS board certification/board eligibility in the specialty being taught at some time in their career.

A COM must have a mechanism to review and approve credentials of physician faculty that have never been board certified or are not board eligible by the AOA or ABMS at non-core rotations sites.

All non-physician faculty in the patient care environment must have demonstrated appropriate qualifications in their disciplinary field.

Guideline: There is no single formula or benchmark minimum number of faculty adequacy. Each COM should be evaluated based on its class size, curriculum, and instructional design. There should be a sufficient full-time equivalent (FTE) number of diverse (by area of specialization) faculty to execute the curriculum. Committees should be adequately populated and attended. Faculty should have time to perform research and student advising. Preceptors should be available in each core and required specialty to deliver clinical experiences. Faculty should be satisfied with the COM's demands for their work effort. Students should feel that faculty are sufficiently available for questions and advising.

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	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1.	An organizational chart demonstrating how the	Dean
	faculty are organized.	Associate/Assistant Dean for Faculty Affairs
2.	Tables 7.1a and 7.1b	Faculty
3.	For the site visit: The complete faculty file,	Faculty Association
	including the most current and complete curricula	Students
	vitae and credentialing information, of all faculty,	Human Resources
	including all adjunct faculty.	

Element 7.2: Faculty Approvals at All Teaching Sites

A COM must academically credential and/or approve the faculty at all COM and COM-affiliated and educational teaching sites.

Guideline: COM approval of faculty can include formal appointment to the faculty with assignment of rank, appointment to adjunct faculty, or designation as an instructor or preceptor without rank. Credentials on file with the COM should include confirmation of experience, licensure, training, and certification as appropriate for the scope of teaching responsibility and appointment status. Where preceptor appointment is delegated to an affiliated institution, it must be specified in the affiliation agreement and the affiliate must be able to provide such records upon request. Appointment delegation should be outlined in the COM's policies.

Documents to review for verifying compliance

- 1. The policies and procedures for credentialing and appointment, or approval of all COM faculty.
- 2. Complete table 7.2 listing credentials for all clinical faculty.

Interviews to conduct for verifying compliance
Human Resources
Associate Dean of Clinical Education
Clinical Rotation Site Directors
Associate Dean for Pre-Clinical Education
Chairs
Faculty at the teaching sites

Element 7.3: Department Chair Qualifications

A COM and any branch campus must employ chairs of department(s), or the equivalent of departments, with proven experience in teaching and academic leadership in a medical education setting. For clinical department chairs, the chair must have an active medical license and active AOA or ABMS board certification in their specialty.

Guideline: Experience in a medical education setting for purposes of serving as a department chair can include a prior appointment to a medical school faculty, residency core faculty, or allied health faculty where the scope of responsibility included participation in the administration of the program, service as a vice-chair or equivalent or leadership of participating teams. Service as a preceptor or residency non-core faculty does not qualify as required experience. This individual must have acquired expertise in curriculum design and assessment prior to being placed in a leadership role.

Documents to review for verifying compliance

- 1. An organizational chart, showing names and titles, demonstrating the reporting hierarchy for each department.
- 2. Current job description for each department chair (or equivalent).
- 3. Current CV for each department chair (or equivalent).
- 4. For clinical department chairs (or equivalent), a copy of the department chair's medical license.
- 5. For clinical department chair (or equivalent), a copy of the department chair's AOA or ABMS board certification documents.

Interviews to conduct for verifying compliance Dean

Associate Deans for Pre-Clinical and Clinical Education

Department Chairs Human Resources

Element 7.4: Primary Care Leadership

A COM may organize its medical faculty under an organizational structure of its own design, but the leadership of the COM's clinical education must include one or more actively licensed osteopathic physicians who are AOA or ABMS board certified in a primary care discipline (family medicine, internal medicine, or pediatrics) with proven experience in teaching and academic leadership in a medical education setting.

Guideline: At least one board certified osteopathic physician must be engaged in oversight of the development and delivery of the primary care curriculum. Such leadership roles would include course directorships, prominent responsibility within the framework of a curriculum committee, and Assistant/Associate Dean whose scope of responsibility includes the clinical curriculum. This individual must have acquired expertise in curriculum design and assessment prior to being placed in a leadership role.

Documents to review	tor	veritving	compliance

- 1. The job description for the chair of primary care (or equivalent).
- 2. The complete CV for the chair of primary care (or equivalent).
- 3. The chair's (or equivalent) medical license.
- 4. The chair's (or equivalent) AOA or AMBS board certification documents.

<u>Interviews to conduct for verifying compliance</u> Dean

Associate/Assistant Dean of Primary Care Department Chairs (as appropriate)

Element 7.5: OMM/OPP Leadership (CORE)

Osteopathic philosophy and principles (OPP) that include osteopathic manipulative medicine (OMM) are defining characteristics of a COM in maintaining its osteopathic distinction. Accordingly, in a Department of OMM/OPP or equivalent, a COM must employ at least one full-time Doctor of Osteopathic Medicine with proven experience in developing and delivering OMM/OPP curriculum at a COM, an active medical license, and active board certification from the American Osteopathic Board of Neuromusculoskeletal Medicine (AOBNMM) or a Certificate of Special Proficiency in OMM (C-SPOMM), whose principal duties include developing the osteopathic content of the COM's curriculum.

Guideline: The OMM/OPP curriculum must be created by and delivered under the direction of an osteopathic physician possessing the credentials as listed in this element. This individual must have acquired expertise in curriculum design and assessment prior to being placed in a leadership role. The AOA's OMT designation does not count towards the credentialing requirement for this element.

Documents to review for verifying compliance

- 1. The job description for the chair of OMM/OPP*
- 2. The complete CV for the chair of OMM/OPP*
- 3. The chair's* medical license
- 4. The chair's* board certification documents
- *or person responsible for developing the OMM/OPP curriculum.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Dean

OMM/OPP Department Chairs

Element 7.6: Faculty Development

A COM must develop and implement an ongoing needs-based, assessment-driven, faculty development program for faculty at all campus locations that is in keeping with the COM's mission.

Guideline: The faculty development program should be directed by a periodic needs assessment informed by student performance, faculty surveys, external consultants, and awareness of best practices. Reassessment of faculty development needs should occur regularly.

Documents	to review	for verifyin	g compliance
Document	to retre	101 (0111)111	

- 1. The most recent annual faculty development needs assessment.
- 2. A roster of all faculty development activities, for the past academic year, including documentation of the faculty participation at each activity.

<u>Interviews to conduct for verifying compliance</u> Associate/Assistant Dean of Faculty affairs

Chairs

Human Resources Faculty Association

Faculty

Element 7.7: Faculty Association

A COM must have a faculty organization that serves as a representative forum for faculty participation for the free exchange of ideas and concerns, of all faculty. The faculty association must include representation of faculty from all campus locations, when applicable. A branch campus may have a faculty association independent from its parent COM.

Guideline: The faculty must be formally organized to exercise self-advocacy. The entity can determine its own structure and leadership. The entity must meet on a regular basis to afford all faculty ample opportunity to address issues of concern. Leadership of the entity must demonstrate that it engages in regular dialogue with the leadership of the COM to convey issues and identify others to be brought back to its constituents. The entity must not discriminate against any group of duly appointed faculty in its advocacy efforts. During faculty interviews it will be determined if the faculty perceives that there was a free exchange of ideas during these meetings. There must be representation from additional location(s) in the faculty association.

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	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1.	The bylaws for the faculty association(s)	Dean
2.	A list of meeting dates and meeting minutes for the	Faculty Association
	faculty association(s) for the past academic year.	Faculty
3.	A copy or a link to the faculty handbook.	

Element 7.8: Faculty Appointment and Advancement

A COM must have clear policies and procedures in place for faculty appointment, renewal of appointment, promotion, granting of tenure (if a tenure program exists), and remediation. The policies and procedures must provide each faculty member with written information about his or her term of appointment, responsibilities, lines of communication, privileges and benefits, performance evaluation and remediation, terms of dismissal, due process, and, if relevant, the policy on practice earnings.

A COM or its parent institution must create a process to review pay and rank parity every three years consistent with its mission-appropriate diversity outcomes among its faculty.

Guideline: The COM must produce its policies and procedures that address each requirement. Faculty interviews should confirm receipt of this information. Evaluators and reviewers must confirm policies on items A through H in the submission requirements below. Policies on lines of communication may be a defined reporting structure.

Documents to review for verifying compliance

- 1. the policies and procedures for faculty appointment and advancement, including
 - a. term of appointment;
 - b. responsibilities;
 - c. lines of communication;
 - d. privileges and benefits;
 - e. performance evaluation and remediation;
 - f. terms of dismissal:
 - g. due process; and
 - h. the policy on practice earnings (if relevant).
- 2. The link to where the policies and procedures are published.
- 3. The pay/rank equity review policy
- 4. The most recent pay/rank equity review study.

Interviews to conduct for verifying compliance

Dear

Associate/Assistant Deans

Chairs

Faculty Association

Faculty

Human Resources

Element 7.9: Diversity, Equity, and Inclusion (DEI) Training

A COM must offer DEI training to employed faculty and staff at least annually to the extent permitted by law.

Guideline: The COM must identify how notice of available training is distributed to faculty and staff. Training may be live, pre-recorded asynchronous, or a commercially available online program. Training must be developed and delivered by qualified individuals/entities and should be assessed for effectiveness and improvement.

Documents to review for verifying compliance

1. Documentation that demonstrates that DEI training is offered to all COM-employed faculty and staff at least annually.

Interviews to conduct for verifying compliance

Human Resources DEI Leader Faculty Association Faculty Staff

Standard 8: Scholarly Activity

A COM must demonstrate a commitment to research and scholarly activity through its budgetary processes, support of faculty research (including the establishment of a research infrastructure, including an office of research, faculty and personnel to assist students in research and peer review through publication or grant application), and inclusion of its students in research throughout all four years of the osteopathic medical education.

Element 8.1: Research and Scholarly Activity Strategic Plan (CORE)

A COM must produce and publish a strategic plan for research and scholarly activities at all campus locations that documents how the COM intends to contribute to the advancement of knowledge through research and scholarly contributions. The plan must include cultural competency and health disparities research/scholarly activities.

Guideline: The research plan should identify the COM's goals/objectives for the research program, proposed activities to accomplish the objectives, a timeline for the start/completion of those activities, any interim milestones to be reached, and a means of assessing achievement of its research goals. The COM's leadership should periodically prepare a report or otherwise record its progress toward satisfying its research goals.

Documents to review for verifying compliance

- 1. The COM's research and scholarly activity strategic plan and a link to the public webpage where it may be accessed.
- 2. Table 8, which identifies the activity of the COM's faculty (and staff, if applicable) over the past three years.

Interviews to conduct for verifying compliance

Dean Chairs

Research Director

Faculty

Staff (as appropriate)

Students

Element 8.2: Research and Scholarly Activity Budget (CORE)

A COM must have budgetary processes and a budget that supports research and scholarly activity by its faculty, staff, and students.

Guideline: The operating budget of the COM must identify support specifically allocated to the research program. Development and maintenance of dedicated research facilities, salary for leadership and support personnel, expenditures unique to individual projects, and publication costs are all examples of line items that may be seen in an operating budget in support of institutional research. Some expenses (such as personnel) may be incorporated into larger line items in the COM's budget.

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- 1. Description of COM's budgetary processes that shows support for research and scholarly activity by its faculty and students.
- 2. The COM's research and scholarly activity budget

Interviews to conduct for verifying compliance

Dean Chairs

Research Director

Chief Financial Officer

Faculty

Staff (as appropriate)

Element 8.3: OMM/OPP Research and Scholarly Activity (CORE)

A COM must demonstrate how its research/scholarly activity includes or incorporates osteopathic manipulative medicine (OMM) and osteopathic principles and practice (OPP).

Guideline: OMM/OPP may be uniquely studied as a curricular element, a clinical study of efficacy, or embedded as a diagnostic or treatment modality as part of another clinical study. The role of OMM/OPP should be described in any resulting scholarly production.

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- 1. A description of OMM and OPP incorporation into the COM's research and scholarly activity.
- 2. Table 8, which identifies the activity of the COM's faculty (and staff, if applicable) over the past three years.

Interviews to conduct for verifying compliance

Dean

OMM Chair

Research Director

OMM Faculty

Students

Element 8.4: Student Participation in Research and Scholarly Activity (CORE)

A COM must publish and follow policies and procedures to support student driven research and scholarly activity, as well as student participation in the research and scholarly activities of the faculty at all campus locations.

Guideline: The COM must provide opportunities for students to engage in research and report outcomes (scholarly activity). Activity can be episodic or longitudinal, original (with faculty oversight) or within a faculty members' existing research activity. The COM should define which students are eligible to participate in research and should have clear and comprehensive policies and procedures that govern the conduct of their activity and any resulting intellectual property.

Documents to review for verifying compliance

- 1. All student research and scholarly activity policies
- 2. A link to the public webpage where these policies are published.
- 3. Table 8, which documents student research and scholarly activity

Interviews to conduct for verifying compliance

Dean

Chairs

Research Director

Faculty

Students

Standard 9: Students

A COM must establish and publish admission requirements for potential applicants to the osteopathic medical education program and must develop and apply effective policies and procedures for medical student selection and enrollment consistent with the COM's mission, vision, and values.

A COM must develop and implement policies and procedures as well as provide the human and physical resources required to support and promote health and wellness in order to meet and advance the physical, emotional, mental, career, academic and professional needs of its students, faculty, and staff. All osteopathic medical students of the COM have the same rights to and must receive comparable services.

Element 9.1: Admissions Policy

A COM must establish and publish, to the public, admission requirements for potential applicants to the osteopathic medical education program and must use effective policies and procedures for osteopathic medical student selection for admission and enrollment, including demonstration of technical standards for admissions. A COM must tie all admissions policies to the COM mission.

Admissions policies for COMs with additional locations must be the same for the parent campus and its additional location. Branch campuses may have separate admissions policies.

Guideline: All requirements, prerequisites, and any other applicant characteristics that will be used by the COM to make admissions decisions must be clearly described on the COM's public-facing web pages.

	COM to make dumissions decisions must be clearly described on the COM's photic juding web pages.				
	Documents to review for verifying compliance	Interviews to conduct for verifying compliance			
1.	All admission requirements, policies, and procedures	Dean (+Branch Campus Dean)			
	for osteopathic medical student selection and	Admission Leadership			
	enrollment.	Registrar			
2.	The technical standards required of matriculates.	Financial Aid Leadership			
3.	A link to the public webpage where the policies are	Students			
	published.				

Element 9.2: Academic Standards (CORE)

A COM must publish and follow policies and procedures on academic standards that include grading, class attendance, tuition and fees, refunds, student promotion, retention, graduation, students' rights and responsibilities, and the filing of grievances and appeals.

Guideline: Policies and practices that govern how the COM addresses and holds accountability for each of the listed requirements must appear in its catalogue, handbooks, or other public facing documents to inform potential candidates for admission, admitted students, faculty, staff, and other community stakeholders.

potential canalaates for aamission, aamittea students, fac		ully, staff, and other community stakeholaers.
	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1.	Provide copies of policies and procedures on	Associate/Assistant Deans
	academic standards, including:	Registrar
	a. grading	Students
	b. class attendance	
	c. tuition and fees	
	d. refunds	
	e. student promotion	
	f. retention	
	g. graduation	
	h. students' rights and responsibilities; and	
	i. filing of grievances and appeals.	
2.	A link to the public webpage where these documents	
	are published	

Element 9.3: Transfer Policies

A COM must publish and follow policies regarding transfer or admissions with advanced standing. A COM may only accept credits from a school accredited by the COCA or the Liaison Committee on Medical Education (LCME) where the student is eligible for readmission. The COM must ensure that if transfer occurs from an LCME accredited school of medicine, the student must acquire OMM/OPP competency prior to graduation from the COM. The last two years of education must be completed at the COM granting the degree.

COMs with additional locations or branch campuses must indicate if the same transfer policies apply to all campus locations.

Guideline: A COM is not required to accept transfer students and must state that in its catalogue. However, if the COM accepts transfer students, it must follow the requirements stated in this element and clearly state these requirements in its public-facing documents. The COM must describe its plan for assuring OMM/OPP competency for students who transfer with credit hours from an LCME-accredited school.

Documents to review for verifying compliance		<u>Interviews to conduct for verifying compliance</u>	
1.	All transfer policies and procedures, including those	Admissions Leadership	
	made available to students pursuant to 34 CFR §	Registrar	
	668.43(a)(11), and a link to where these transfer	Students	
	policies are published on a public webpage.		

Element 9.4: Secure Student Recordkeeping

A COM must develop an accurate, confidential and secure system for official student record keeping at all campus locations that includes admissions, advisement, academic and career counseling, evaluation, grading, credits, and the training of faculty and staff in the regulations regarding these records.

Guideline: A COM may keep student records in hardcopy, digital format, or both. Hardcopies must be stored in an environment that is not subject to document deterioration (moisture, temperature) and is protected from view by any individual without authorized access. For digital format, backup should occur to assure that no new information or intended change to the record is lost. All students, faculty, employees, and contractors having access to protected student information must receive training as required under FERPA rules. The COM must produce records of how such training is provided and who received that training.

	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1	. The policies and procedures on student	Registrar
	recordkeeping.	IT personnel
2	. the policies and procedures for training of faculty	Students
	and staff pursuant to the Family Educational Rights	Faculty
	and Privacy Act (FERPA).	Staff

Element 9.5: Academic Counseling (CORE)

A COM must provide academic counseling to assist all students in study skills, learning styles, learning resources, and other assistance for academic success.

Guideline: The COM must operate a plan for student coaching/advising that provides students with effective strategies for learning. The plan should describe a process for identifying intervening with students at risk. Faculty charged with academic advising responsibilities solely or in partnership with staff must have protected time reserved for these activities. A dedicated counseling staff is not required. Students at additional locations should have access to these services on-site.

	Documents to review for verifying compliance	<u>Interviews to conduct for verifying compliance</u>
1.	A description of the process for ensuring that	Student Services Office
	academic counseling is provided to students at all	Academic Counseling Staff
	locations.	Faculty
2.	Table 9.5.	Students

Element 9.6: Career Counseling (CORE)

A COM must provide career counseling to assist all students in evaluating career options and applying to graduate medical education training programs.

Guideline: The COM's career advising program should begin in Year 1 and add greater depth each year as students progress toward residency application. Informative activities may be live, asynchronous, or web based. Students must have access to a knowledgeable advisor (staff or faculty). Students are expected to receive timely individual counseling to prepare their ERAS application, review the contents of their MSPE letter (if the COM's policy allows), and adopting an interview and match strategy. Student utilization is confirmed by a record of participation, such as a sign-in sheet or other documentation. Students at additional locations should have access to these services on-site.

	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1.	A description of the process for ensuring that career	Student Services Office
	counseling, including GME readiness, is provided to	Career Counseling Staff
	students at all locations.	Students
2.	Table 9.6.	

Element 9.7: Financial Aid and Debt Management Counseling

A COM must provide financial aid counseling to all students to assist them with financial aid applications and debt management.

A COM must publish annually a list of active scholarship opportunities made available by the institution to COM students.

Guideline: The COM must provide entrance and exit counseling for students participating in Title IV federal loan programs. The COM must provide access to a financial aid counselor to address unique student debt management issues. Students at additional locations should have access to these services on-site.

Documents to review for verifying compliance

- 1. Provide a description (250 words or less) of all financial aid and debt counseling sessions provided to its students, including:
 - a. When the financial aid and debt counseling sessions are/were provided to the students;
 - b. The OMS year during which students are required to receive these sessions; and
 - c. A roster of students that received financial aid and debt counseling.
- 2. A link to the public webpage listing scholarship opportunities made available by the institution to COM students.

Interviews to conduct for verifying compliance
Student Services Office
Director of Financial Aid
Financial Aid Counseling Staff
Students

Element 9.8: Mental Health Services (CORE)

A COM must have policies and procedures to provide its students at all locations with confidential access to an effective system of counseling and mental healthcare from a mental health care provider. A mental health care provider must be accessible 24 hours a day, 365 days a year, from all locations where students receive education from the COM.

Guideline: A COM is not required to have on-site mental health service providers. The COM may subscribe to a national behavioral health service that provides virtual access for students 24/7/365. Alternatively, or additionally, the COM should identify mental health providers who agree to accept its students as patients in the communities where the COM is located and where it conducts its core and required rotations. Students must be informed of how to access these services.

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Documents to review for verifying com	<u>Interviews to conduct for verifying compliance</u>			
1. policies and procedures for students seek	ing Student Services Offices			
counseling and mental health services.	Mental Health Counselors			
2. A link to webpage where students access	mental Students			
health care information.				
3. A list of the mental health services availa	able to			
students at all teaching locations with sen	rvice			
locations and hours.				

Element 9.9: Physical Health Services (CORE)

A COM must have policies and procedures to provide its students with access to diagnostic, preventive, and therapeutic health services accessible in all locations where students receive education from the COM.

Guideline: The COM is not required to have on-site physical health service providers. The COM may subscribe to a national health care service that provides virtual access for students 24/7/365. Alternatively, or additionally, the COM may identify health care providers who agree to accept its students as patients in the communities where the COM is located and where it conducts its core and required rotations. Students must be informed of how to access these services.

Documents to review for verifying compliance

- 1. The policies and procedures for students seeking diagnostic, preventive and therapeutic health services
- 2. A link to webpage where students access physical health care information.
- 3. A list of the health services locations where students may seek care at all teaching locations.

Interviews to conduct for verifying compliance Student Services Offices Student Health Services (if applicable) Students

Element 9.10: Non-Academic Health Professionals (CORE)

A COM must ensure that any health professional providing health services, through a provider- patient relationship, must recuse themselves from the academic assessment or promotion of the student receiving those services. A COM must provide a copy of the recusal policy annually to students and faculty.

Guideline: Providers rendering health care to any student cannot provide an academic assessment of that student for purposes deriving a grade in any course or clinical rotation. They can facilitate learning opportunities through lectures, skills training, coaching, mentorship, or other venues exclusive of individual assessment for a grade.

Documents to review for verifying compliance

- 1. The policies and procedures on recusal from student assessment and promotion for health professionals providing services to students.
- 2. links to webpage where these policies and procedures are published for students and faculty.
- 3. A description of how this information is provided to students and faculty.

<u>Interviews to conduct for verifying compliance</u> Student Health Services

Faculty

Students

Element 9.11: Health Insurance

A COM must require that all students have health insurance.

A COM, or its parent institution, must offer a health insurance plan option to all students.

Guideline: The COM should confirm how it assures that all students hold health insurance. Confirmation can be made by requesting sample records and through student interviews.

Documents to review for verifying compliance

1. All policies and procedures regarding health insurance for students, including the annual verification process. and a link to the webpage where these documents are published.

Interviews to conduct for verifying compliance Admissions Leadership Students Services Students

Standard 10: Graduate Medical Education (GME)

The faculty of a COM must ensure that the curriculum provides content of sufficient breadth and depth, to prepare students for entry into a graduate medical education program for the subsequent practice of medicine. The COM must strive to develop graduate medical education to meet the needs of its graduates within the defined service area, consistent with the mission of the COM.

Element 10.1: Osteopathic Educational Continuum

A COM must have policies, procedures, personnel, and budgetary resources to support the continuum of osteopathic education, including graduate medical education.

Guideline: The COM must dedicate resources for the development, growth, and support of graduate medical education and continuing medical education. The COM must show that it has an established infrastructure to provide this support. Residency faculty development, COM-based resident training, and sponsored CME courses are examples of activities that advance the continuum of osteopathic medical education.

Documents to review for verifying compliance

- 1. The COM's policies regarding and a description of the COM's procedure, personnel, and budgetary resources that support the continuum of osteopathic education.
- 2. Budget reflecting support for GME

<u>Interviews to conduct for verifying compliance</u> Dean

Associate/Assistant Dean of GME

Chief Financial Officer

Associate/Assistant Dean of Clinical Education

Chairs of Clinical Departments

Element 10.2: Accredited GME

A COM must provide a mechanism to assist new and existing GME programs in meeting the requirements for accreditation.

Guideline: The COM must show where it is actively engaged in the creation and expansion of graduate medical education programs. The COM should identify its accomplishments since its previous inspection. Interviews with affiliates should describe how the COM assisted them in attaining and maintaining ACGME accreditation. COMs can provide the names of grants they have applied to that assist in the creation of GME. They can also show how faculty and staff are engaged in creating and expanding GME.

Documents to review for verifying compliance

- 1. the COM's policy and description of its mechanism to assist new and existing GME programs in meeting the requirements for accreditation.
- 2. Table 10.2a

<u>Interviews to conduct for verifying compliance</u>
Dean

Associate/Assistant Dean of GME

Associate/Assistant Dean of Clinical Education

Chairs of Clinical Departments

Element 10.3: Osteopathic Recognition of GME

A COM must provide a mechanism to assist GME programs in meeting the requirements of osteopathic recognition.

Guideline: The COM must show where it is actively engaged in the creation and expansion of graduate medical education programs seeking osteopathic recognition. The COM should identify its accomplishments since its previous inspection. Interviews with affiliates should describe how the COM assisted them in attaining and maintaining osteopathic recognition of their GME programs.

Documents to review for verifying compliance

1. The documentation demonstrating the COM's processes and commitment of resources to assist GME programs to achieve osteopathic recognition.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Dean of GME

Chair OMM

Standard 11: Program and Student Assessment and Outcomes

A COM must define and assess both programmatic and individual student outcomes, including attainment of osteopathic core competencies and skills, to ensure GME readiness, including its DEI mission, vision, and goals.

A COM must use the data from programmatic and individual outcomes to continuously improve all aspects of the COM and to meet its mission.

Element 11.1: Program Assessment (CORE)

A COM must conduct learning outcome assessments that connect to its program mission, goals, and objectives to continuously improve the educational quality of its osteopathic medical education program.

Guideline: The COM must have a holistic, data driven plan for determining its success in meeting its mission through its operation of the degree program. This may be a periodic comprehensive assessment of all components or a review of the outcomes of each of its critical operations and departments on a rotating basis. The COM's plan may be internally executed or through an external consultant for this assessment. The COM should report and execute action plans for quality improvement where needed.

Documents to review for verifying compliance

- 1. The guiding documents which govern how the COM conducts program learning outcome assessments. This may be in the form of a program review manual or guide that has been adopted by the faculty. This must describe an assessment of the osteopathic core competencies in the curriculum.
- 2. A list of the program learning outcome assessments performed over the past three academic years.
- 3. Examples of changes in curriculum, pedagogy, counseling, or other aspects of the program that have been made as a result of recent reviews.

<u>Interviews to conduct for verifying compliance</u> Dean

Associate/Assistant Deans

Department Chairs

Curriculum Committee

Faculty

Students

Element 11.2: Student Evaluation of Instruction

A COM must have policies and procedures in place to collect and consider confidential student evaluations of their courses, clerkships, faculty, and other relevant student experiences. The COM must demonstrate that these results are incorporated into the COM's self-assessment to improve curriculum; promote diversity, equity, and inclusion; and address deficiencies in student experiences.

Guideline: The COM may require students to evaluate courses and faculty following each contact, on a course-by-course basis, or periodically at its discretion. The COM must demonstrate consistent review of these evaluations and how they inform curricular change, faculty development, or other elements of the degree program.

Documents to review for verifying compliance

- 1. The processes for obtaining student evaluation of classroom and clinical instruction.
- 2. A description of how student evaluations are kept confidential.
- 3. The evaluation forms used by students for these purposes.
- 4. A flowchart demonstrating how the evaluation data are utilized in curricular improvement.

Interviews to conduct for verifying compliance

Associate/Assistant Deans

Department Chairs

Curriculum Committee

Faculty

Rotation administrators and preceptors

Students

Element 11.3: Student Debt Outcomes

A COM and/or its parent institution must collect and publish data on the debt load and student loan default rates of its students in such a way that applicants can be aware of the information.

A COM must make available by request four years of student debt load and student loan default rates including, at a minimum, race/ethnicity and gender demographic data. The mechanism to request this data must be published and easily identifiable on the COM's website. When applicable, for any value less than ten, the COM should indicate that value as "less than 10" in place of the value.

Guideline: The information required for compliance with this standard must be publicly available. Additionally, the COM must confirm it has a mechanism to make demographic debt data available upon request.

Documents to review for verifying compliance

- 1. The current average debt for the last four years of students at each campus location and a public facing link to where the information is published.
- 2. A link to the public webpage where the debt load and default rate information can be requested.
- 3. For each of the four academic years preceding the submission of this information, the student loan default rate for all federal financial aid obtained under the Higher Education Act of 1965, as amended, including financial aid provided under Title IV of the HEA.

Interviews to conduct for verifying compliance
Financial Aid Leadership
Director of Student Services
Students

Element 11.4: Student Outcomes

A COM must collect data to demonstrate the achievement of student outcomes.

11.4a COMLEX-USA

Prior to graduation, all students must demonstrate osteopathic medical knowledge and osteopathic clinical skills by passing the Comprehensive Osteopathic Medical Licensing Examination of the United States (COMLEX-USA) undergraduate examinations (Level 1 and Level 2) and meeting a national standard for osteopathic clinical skills competency.

The COM must continually publish to the public the first-time pass rates for all students in each of the competency assessments in the COMLEX-USA examination series (Level 1, Level 2, and Level 3) as reported by the NBOME. COMs must update their public websites within 30 days of receiving their annual update for each COMLEX-USA level testing cycle.

Guideline: The COM's policy must require that students pass COMLEX-USA Levels 1 and 2 prior to graduation. The pass rate data for Levels 1, 2 and 3 must be posted publicly to the COM's website. Branch campus data must be published separately. Additional locations may also be published separately.

Documents to review for verifying compliance

- 1. all policies and procedures relating to the COMLEX-USA exams.
- 2. A link to the public webpage where the COM's COMLEX-USA level 1, 2, and 3 first time pass rates are published.

Interviews to conduct for verifying compliance

Dean

Students

Promotions Committee

11.4b GME Placement Rates

A COM must continually publish publicly the placement rates of its students in graduate medical education programs.

A COM must make available by request four years of student GME placement rates including, at a minimum, race/ethnicity and gender demographic data. The mechanism to request this data must be published and easily identifiable on the COM's website. When applicable, for any value less than ten, the COM should indicate that value as "less than 10" in place of the value.

Guideline: GME placement rate data must be publicly available on the COM's website. The COM must confirm it has a mechanism in place that allows demographic data to be requested. Placement is defined as obtaining post-graduate employment through the Match or other matches, SOAP, or outside the NRMP. The cut-off for this data is by July 1 following the most recently completed academic year. A COM should show how it continually tracks the progress of previous cohorts.

Documents to review for verifying compliance

- 1. Provide a link to the public webpage where the COM's GME placement rates are published, for the last four academic years in all residency programs.
- 2. A link to the public webpage where GME placement rates can be requested.
- 3. Table 11.4b

<u>Interviews to conduct for verifying compliance</u> Dean

Associate/Assistant Dean of GME or equivalent Students

11.4c Cohort Graduation Rates

A COM must continually publish publicly the graduation rates by matriculation cohort at years 4, 5, and 6 for students only pursuing the DO degree.

Guideline: The COM must provide the graduation data on a publicly available webpage.

Documents to review for verifying compliance

- 1. A link to the public webpage where the COM's cohort graduation rates at years 4, 5, and 6 are published.
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 2. Table 11.4c

<u>Interviews to conduct for verifying compliance</u>

Promotions Committee

Student Affairs

Students

11.4d Cohort Retention Rates

A COM must continually publish publicly the retention rates (as defined in the glossary) by matriculation cohort.

Guideline: The COM must provide the retention data on a publicly available webpage

Documents to review for verifying compliance

- 1. Provide a link to the public webpage where the COM's cohort retention rates are published.
- 2. Table 11.4d

Interviews to conduct for verifying compliance

Registrar

Students

Element 11.5: Student Survey

A COM must cooperate with the administration of the COCA student survey as part of the comprehensive accreditation process.

Guideline: The COM must describe its efforts to encourage and facilitate the completion of the COCA survey by all students prior to a scheduled comprehensive or focused site visit as may be requested by the COCA. This may include email, other social media, and in-class announcements. Students should not be coached on how to complete the survey. The expectation of completion rate is at least 50% for each campus. COM leadership should be generally aware of the results of the survey and actions taken to address student concerns, as needed.

Documents to review for verifying compliance

- 3. The description of the methods the COM used to support the completion of the COCA student survey.
- 4. COM's response to the findings of the survey, provided within 30 days of receipt.

Interviews to conduct for verifying compliance

Dean

Associate/Assistant Deans

Students

Element 11.6: Program and Student Outcomes – Annual and Mid-Cycle Reports (CORE)

A COM having accreditation status must submit specified annual and mid-cycle reports to the COCA.

Guideline: The COM is responsible for providing required and requested reports to the COCA in a timely manner. COCA staff will confirm that this has occurred. The COM should maintain records of all reports made to the COCA.

Documents to review for verifying compliance

 COCA staff will confirm that the COM has completed and submitted the required COCA Annual and Mid-Cycle Reports by the established deadlines. <u>Interviews to conduct for verifying compliance</u> None. COCA staff provides this information.

Standard 12: Institutional Accreditation (if applicable)

For any COM that is not affiliated with a parent institution, the COCA may serve as both institutional and programmatic accreditor. When the COCA serves as the institutional accreditor, the COM must demonstrate that it is compliant with this standard and its supporting elements. A COM may not add another program of study in addition to the osteopathic medicine program while the COCA serves as its institutional accreditor.

Element 12.1: Incorporation of the Institution (CORE)

A COM must demonstrate its incorporation as a non-profit or for-profit entity (e.g., corporation, limited liability company, etc.) with governing bylaws that are consistent with the COCA accreditation standards. The COM must have an autonomously appointed functioning governing body that is broad in representation of expertise in education, DEI, finance, law, health policy, and osteopathic medicine. The majority of the members of the governing body must be independent of financial interest/benefit from the COM.

Guideline: The COM must be incorporated and legally constituted to conduct its degree programs as required by its state licensing authority. Governance must be a by a board or similarly constituted fiduciary and self-governing body. The COM must produce bylaws or similar documents that memorialize the composition and authority of the corporation and its leadership.

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- 1. The annual registration documents for ongoing incorporation for the COM.
- 2. The bylaws of the governing body
- 3. A list of members of the governing body and their titles.
- 4. Evidence of an annual assessment of the governing body's conflicts of interest.

Interviews to conduct for verifying compliance

President

Board of Trustees

Dean

Element 12.2: Degree and Other Educational Offerings (CORE)

A COM must demonstrate evidence of approval to grant the Doctor of Osteopathic Medicine (DO) degree and any other educational offerings from all appropriate regulatory agencies whether it is a board of regents, a state regulatory agency, or any other regulatory agency charged with granting such authority under the laws of the state in which the COM is located.

Guideline: The COM must produce its charter or other communication from a state licensing agency or office of higher education that confirms its authority to grant doctoral degrees. When the COCA serves as a COM's institutional accreditor, the COM may only offer the Doctor of Osteopathic Medicine degree.

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1. All charters, licenses, or letters of approval from any educational or business agencies that grant authority to offer the DO degree.

Interviews to conduct for verifying compliance

President

Board of Trustees

Element 12.3: Chief Executive Officer (CORE)

A COM must employ a chief executive officer who is qualified by education, training, and experience to provide effective leadership to the COM's administration, faculty, students, and staff. The chief executive officer must have a minimum of five years' experience in senior administration in an institution of higher education or healthcare setting.

Guideline: The inspection team should ascertain the experience of the CEO in managing organizations with comparable physical size, number of employees, and budget.

	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
	1. The current job description for the CEO.	Chief Executive Officer
1	2. The current and complete CV for the CEO.	Governing Body Members

Element 12.4: Chief Financial Officer (CORE)

A COM must employ a chief financial officer who is qualified by education, training, and experience to provide organizational leadership related to the financial health of the COM. The chief financial officer must have a minimum of three years' experience in administration in financial management in an institution of higher education or healthcare setting.

Guideline: The inspection team should ascertain the experience of the CFO in managing the finances of organizations with comparable physical size, number of employees, and budget.

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	Documents to review for verifying compliance	<u>Interviews to conduct for verifying compliance</u>
	1. The current job description for the CFO	Chief Financial Officer
	2. The current and complete CV for the CFO.	Chief Executive Officer
	-	Governing Body Members

Element 12.5: Course Credit Hours

A COM must publish policies and procedures for the assignment of credit hours for all intended courses within the curriculum.

Guideline: The assignment of credit hours should be described, follow generally accepted practices in higher education, and be consistently applied. Clinical rotations may follow guidelines for "field work" where extended student work hours may preclude awarding credit hours in the same ratio as classroom-based coursework.

	Documents to review for verifying compliance	Interviews to conduct for verifying compliance
1.	The COM's credit hour assignment policy and a link	Registrar
	to the public webpage where it is published.	

Element 12.6: Public Information

All public information published by a COM in its catalogs, student handbooks, advertising literature, or any other publicly available information must be presented in an accurate, fair, and complete manner.

A COM's catalog must include a diversity statement and the student handbook must include a description of the discrimination incident reporting system and how such situations are resolved.

Guideline: The COM should be able to describe its procedures for periodic review of its published material to ensure currency and accuracy. Discrimination incident reporting may fall under a more general plan for all incident reporting at the COM. Interviews can determine if students and employees are aware of a reporting system for complaints that may include discriminatory practices or policies.

Documents to review for verifying compliance

- 1. All documentation that demonstrates the institution's calendar, as well as its policies on grading, admissions, academic program requirements DEI training, discrimination incident report, tuition and fees, and refunds.
- 2. Evidence of all communication that accurately represents the COM's accreditation status. This communication must include information regarding how to contact COCA.

Interviews to conduct for verifying compliance

President or Provost Dean Associate/assistant Dean Students

Element 12.7 Public Notification of Opportunity to Comment

A COM must seek third-party comments addressing the quality of the COM's educational program prior to the completion of a comprehensive or focused review by the COCA. The notice must include information regarding how the public can contact the COCA directly.

Guideline: The COM must produce evidence that it solicited third party comments ahead of its comprehensive or focused review.

Documents to review for verifying compliance

1. Evidence that a public notice inviting any third-party comments prior to an impending comprehensive or focused site visit was posted on the institution's website no later than three months prior to the date the site visit is scheduled to commence, including information regarding how to contact the COCA directly.

<u>Interviews to conduct for verifying compliance</u> COCA Staff

Element 12.8: Academic Freedom

A COM must include in its publications policies regarding academic freedom. All such policies must be approved by the COM's governing board. Policies must apply to all campus locations.

Guideline: The COM may consult guidelines from the American Association of University Professors (AAUP) or other bodies in determining its policies regarding academic freedom and intellectual property. Policies may be extended to students and staff in addition to faculty. The faculty senate or equivalent should inform the creation of the policy and be in general agreement with its content. All faculty should be aware of the policies and procedures germane to this issue.

Documents to review for verifying compliance

1. The institution's policies regarding academic freedom evidencing a commitment to academic freedom, intellectual freedom, freedom of expression, and respect for intellectual property rights.

Interviews to conduct for verifying compliance
President or Provost
Faculty Association
Faculty
Human Resources

Element 12.9: Title IV Responsibility (CORE)

A COM must demonstrate compliance with the requirements for participation in federal programs under Title IV of the Higher Education Act of 1965, as amended.

Guideline: The COM must produce all documentation as required in this element. Depending on ownership structure stand-alone COMs may not have been accepted to the Title IV program. In such instances, the COM should produce any correspondence it has exchanged with the US Department of Education in seeking admission to the program.

Documents to review for verifying compliance

- 1. The most recent filing of the annual audit pursuant to the Single Audit Act Amendments of 1996, OMB Circular A-133.
- 2. The date of the most recent program review conducted pursuant to Title IV of the HEA and the final action letter from that review
- 3. The most recent audit(s) of the state financial programs, if applicable.
- 4. All relevant correspondence submitted to, and received from, the US department of education for ongoing noncompliance issues, including liabilities owed.
- 5. The negotiated settlement agreements for the payoff of any fines or monies owed in connection with programs reviews.
- 6. The institutional responses to all audits and/or findings.

Interviews to conduct for verifying compliance Director of Financial Aid Title IV Coordinator

Appendix: Tables

Table 4.1: On Campus Facilities

Last Updated: mm/do	д/уууу													
	COCA 2023 Continuing Accreditation Standards Table 4.1 On Campus Facilities													
Use this table to	se this table to describe on-campus facilities. For COMs with additional locations or branch campuses, Column A specifies which campus the facility is on.													
Campus Location	Name of Space	Space Description	Role in daily operation, e.g., curriculum, student services, study space	Maximum occupancy per fire code	•		shared, with	Approximate number of non-DO students using this DO campus space						
Main	Teaching Theater Room 222	Teaching Theater & Quiet Study Space	Curriculum Delivery & Study Space	50	12	50	n/a	n/a						

Table 4.4: Learning Resources

/уууу											
COCA 2023 Continuing Accrediation Standards Table 4.4 Learning Resources											
se this table to list the learning resoruces that are available to COM students. For COMs with additional locations and branch campuses, Column A should specify which location the source is located on or for.											
Resource, e.g., library, simulation, question bank,		Number of resources available. If electronic resource, indicate									
online resource	Resource type, e.g., electronic, paper	how many users the license permits									
Library Collection	paper (books)	unlimited									
i	COCA 2023 Continui Table 4.4 Le ist the learning resoruces that are available to COM students. For COMs d on or for. Resource, e.g., library, simulation, question bank, online resource	COCA 2023 Continuing Accrediation Standards Table 4.4 Learning Resources ist the learning resoruces that are available to COM students. For COMs with additional locations and branci d on or for. Resource, e.g., library, simulation, question bank, online resource Resource type, e.g., electronic, paper									

Table 6.9a: Student Population

Last Updated: mm/dd	/уууу										
COCA 2023 Continuing Accreditation Standards Table 6.9a Student Population											
For each year of t	For each year of the last three years, provide the number of students participating in core clinical rotations.										
Academic year	Number of students beginning core clinical rotations.	Number of students repeating any core clinical rotations.	Total								
2022-2023	95	1	96								
2021-2022	90	2	92								

97

Average

Table 6.9b: Core Clinical Clerkships

2020-2021

Last Updated: mm/dd/yyyy													
						uing Accreditatio ore Clinical Clerk							
Use this table to report <u>core</u> clir	e this table to report core clinical rotations available to your COM students. Enter information for each clinical rotation (one speciality and location per line).												
Site Name (e.g. name of hospital, clinic, or physician in private practice)	Site City	Site State	Rotation Specialty, (e.g., internal medicine,	Medical School Year. Enter the OMS year rotation is undertaken.	# of weeks	Total slots/year available only to your COM	Number of COM credentialed faculty at the site	DO	MD	Number of Other Supervisors	Number of In- Patient rotation slots at site	Number of residents working with students at this site.	
ACE Hospital - Chicago	Chicago	IL	Family Medicine	OMS III	4	. 22	5	2	1	1	22	4	

0

97

95.00

COCA 2023 Continuing Standards Crosswalk

Table 7.1a On Campus Faculty Effort

Last Updated	d: mm/dd/yyyy											
						C	OCA 2023 Continuing A Table 7.1a On-Cam	Accreditation Standards upus Faculty Effort				
Please ente	-	formation for	all on-campu	s faculty. Fo	r faculty that a	lso have administra	ative staff responsibiliti	es, enter the staff time on T	able 7.1b. COMs with	branch campuses or ac	Iditional locations, con	nplete a separate table for
												Total FTE devoted to
												DO program (total of
							FTE Value of	FTE Value of Research	FTE Value of	FTE Value of	FTE Value of	Columns G, H, I, J, and
					Hire Date or	Total Contracted	Teaching in DO	& Scholarly Activity in	Service in DO	Administration in DO	Clinical Practice in	K). This is not to exceed
Campus	Specialty or				Anticipated	FTE for	program (enter as	DO program (enter as	Program (enter as	Program (enter as	DO Program (enter	the value noted in
Served	Field	Last Name	First Name	Degree(s)	Hire Date	Institution	decimal)	decimal)	decimal)	decimal)	as decimal)	Column F
Main	Anatomy	Doe	Joan	DO, PhD	xx/xx/xxxx	1	0.7	0.2	0	0.1	0	1
												(
												(

Table 7.1b: Administrative Staff

Last Updated: mm/	dd/yyyy												
				023 Continuing Accre Table 7.1b Administr									
	lease enter the following information for all on-campus administrative staff. For staff that also have faculty responsibilities, enter the faculty time on Table 7.1a. COMs with branch campuses or additional cations, complete a separate table for each location.												
							Total FTE of						
	Department, e.g.,					Hire Date or	Administrative	FTE of Administrative Staff Time					
	administrative, financial aid,					Anticipated Hire	Staff (enter as a	Dedicated to COM (enter as a					
Campus Served	student services, etc.	Position Title	Last Name	First Name	Degree(s)	Date	decimal)	decimal) decimal					
Main	Administration	Executive Assistan	Doe	John	BS	xx/xx/xxxx	1	1					

Table 7.2 Clinical Faculty Credentialing

Last Updated: mm/dd/yyyy													
								reditation Standards					
	Table 7.2 Clinical Faculty Credentialing												
Use this table to list	clinical fa	aculty th	nat work at Co	OM and all COM	-affliated and	d educational teach	ing sites.						
Last Name	First Name	Degrees	Licencing State	License Expiration		Boarded by, e.g., AOA or ABMS		Certification/OCC/MOC Expiration. Indicate "N/A" for lifetime certification.		Boarded by, e.g.,	Certification/OCC/MOC Expiration. Indicate "N/A" for lifetime certification.	On campus or	If applicable, average # of students per rotation supervised by the faculty
Doe	Jerry	MD	IL	xx/xx/xxxx	Family Medicine	AOA	yes	xx/xx/xxxx	n/a	n/a	n/a	ACE Hospital - Chicag	5

Table 8: Research and Scholarly Activity

Last Updated: mm/dd/yyyy				
	COCA 2023 Con	ntinuing Accreditation	Standards	

Table 8 Research and Scholarly Activity

Use this table to record research and scholarly activity completed by the COM in the last three years. List each research or scholarly activity on a separate line. Please only enter a number in fields that ask for a number.

Enter Academic Year:	Title of Research/Scholarly Activity	Breifly describe the types of Research and/or Scholarly Activity (e.g., article, poster, presenter)		Number of Faculty Participants	Number of Staff Participants	Number of Osteopathic Medical Student Participants
	The Efficacy of Small Dose Biologics in the Treatment of Crohn's Disease	Article	no	3	0	2

Table 9.5: Academic Counseling

Last Updated: mm/dd/yyyy							
COCA Continuing Accreditation Table 9.5 Academic Counseling							
Describe the academic counseli	ng sessions available to students in the r	nost recently completed academic year.					
Academic Year:							
	OMS I						
	Person(s) providing the counseling,	Approximate number of students					
Academic Counseling Type	e.g. faculty, staff, peers, etc.	involved in the academic year					
Tutoring	Students	148					
Study skills	Faculty	142					
Test taking	Peers	115					
COMLEX preparation							
Learning styles							
Use of learning resources							
Other (please enter)							

Table 9.6: Career Counseling

Last Updated: mm/dd/yyyy							
COCA 2023 Continuing Accreditation Standards Table 9.6 Career Counseling							
Describe the career counseling s	sessions available to students.						
Academic Year:							
	OMS I						
	Person(s) Providing the	Approximate number of					
	Counseling, e.g., faculty,	students involved in the					
Career Counseling Type	staff, peers, etc.	academic year					
Choice of residency	Faculty	162					
Preparation for interviews	Faculty	135					
Writing a personal statement	Peers	126					
Writing a curriculum vitae							
Match strategy							
Other (please enter)							

COCA 2023 Continuing Standards Crosswalk

Table 10.2: Accredited GME

last updated mm/dd/yyyy							
COCA 2023 Continuing Accreditation Table 10.2							
			Accredited GME				
In this table provide information on the affil	In this table provide information on the affiliated ACGME programs for which the COM has supported development and growth.						
Site Name	City	State	Specialty	# PGY-1 Slots	#PGY-2 Slots	#PGY-3 Slots	#PGY-4 or Higher Slots
ACE Hospital - Chicago	Chicago	IL	Family Medicine	5	7		
Triton Healthcare	St. Louis	MO	Internal Medicine	3	4		

COCA 2023 Continuing Standards Crosswalk

Table 11.4b: GME Placement

Last Updated: mm/dd/yyyy COCA 2023 Continuing Accreditation Standards Table 11.4b GME Placement

Use this table to record the GME placement rates for the COM's graduates for the most recently completed academic year. Enter the number of graduates of that cohort in Column B, and the number of students placed in the residency types listed. If no students fit a category, leave it blank. The percent of class will be calculated automatically. In Columns F and H, if students were not applying to GME or were unable to be placed, select from the drop down what they ultimately did.

This table should be inclusive of students who placed through other matches, SOAP or outside the NRMP match by <u>July 1</u> following the most recently completed academic year.

Academic year	Total number of graduates	Number of graduates applying to positions		ny GME program % of the class	Students not applying to G # of students	ME program % of the class	Students unable to be # of students	placed in a GME program % of the class
2022-2023	125	120	116	97%	5	4%	4	3%
			military program. All military CGME accredited.	If a student was not applying to GME, what did they do?	Number of students	If a student was unable to be placed, what did they do?	Number of students	
	Of view who compute listed above how		# of students	% of GME placements	Began research year	2	Began a fellowship	1
			10	9%	Entered biomedical/pharm	1	Other	3
			Placement in an osteopathic recognized program		Began a Masters program	12		
many were m	• '		# of students	% of GME placements				
recognized, a	nd PGY-1 Or	lly positions?	95	82%				
		Placement in a	PGY-1 Only (Transitional Year,					
		Preliminary Position)						
		# of students	% of the GME placements					
			88	76%				

Table 11.4c: Cohort Graduation Rates

Last Updated: mm	n/dd/yyyy							
		COCA 2	023 Continuir	ng Accreditation	n Standards	Table 11.4c		
			Coh	ort Graduation	Rates			
Please provide	graduation data	a for the last three grad	duating classes	s. Label each gra	aduating year	in column A. Matricular	nts are students wh	o enrolled in
your COM for t	the first time. Sto	udents who repeated a	ı year get coun	ted in the cohor	t they matricul	ated with.		
Matriculating								
Cohort		Number of students						
Academic	Number of	who transferred	How many	graduated in	How mar	y graduated in five	How many grad	uated in six
Year	Matriculants	into the cohort	four	years?	years	? (if applicable)	years? (if ap	plicable)
2019-2020	105	2	99	93%				
2018-2019	108	0	101	94%	108	100.00%		
2017-2018	100	1	88	87%	92	91.09%	99	98%

Table 11.4d: Cohort Retention Rates

Last Updated: mm/dd/yyyy									
COCA 2023 Continuing Accreditation Standards Table 11.4c									
Annual Cohort Retention Rates									
The table data st	nould reflect the cor	nclusion of the most re	ecent academic vear. R	tetention is defined as the					
			s who continue at that						
	Number of								
	Number of	students who							
	matriculants (do	withdrew or were	Number of students						
Matriculating	not count	dismissed from	who transferred out						
Cohort	transfer	this cohort for any	to a new medical						
Academic Year	students)	reason	school	Retention Rate					
2022-2023	100	2	0	98%					
2021-2022	101	4	0	96%					
2020-2021	108	108 6 0 94%							
2019-2020	105	2	0	98%					