Minimum Standards of Student Achievement Policy

Scope of this Policy

In keeping with USDE regulations (34 C.F.R. § 602.16(a)(1)(i)), the COCA has established, and maintains, measurable minimum standards with respect to student achievement for students at all COMs. Evidence of compliance is obtained from each COM and from related sources and is reviewed annually for any needed follow-up action.

Measures of Student Achievement

Student achievement is assessed and reported to the COCA at three key intervals in pursuit of the DO degree. During the second year of matriculation, all COM students are required to take and pass the Comprehensive Osteopathic Licensure Examination (COMLEX) Level 1. During the fourth year of matriculation, students are required to take and pass COMLEX Level 2 CE (Cognitive Evaluation). For students that continue to graduate medical education, COMLEX Level 3 is taken after graduation. Aggregate student pass rates for each of these exams from each COM along with national norms for each administration are provided to the COCA from the testing agency, the National Board of Osteopathic Medical Examiners (NBOME). Data from these exams are reviewed by the Data and Reports Committee (DRC), a standing committee of the COCA.

A fourth collective measure of each COM's student achievement is the rate at which its graduating seniors are placed into graduate medical education (GME). The rate of placement is documented by the National Residency Match Program (NRMP) for each COM and is reported as a percentage of graduates seeking placement who have been successful, through the Main Residency Match, the subsequent Supplemental Offer and Acceptance Program (SOAP), the military match, or similar programs. Placement data from the NRMP and related sources are reviewed by the Data and Reports Committee.

Reliability of Data

The COCA both requires and relies upon these sources of data about student achievement because they come from external, highly regulated, and nationally-normed sources. Because the COMLEX examinations are necessary for both licensure and future advancement within the profession, their development and administration are subject to rigorous psychometric oversight. The COCA relies on the placement data from the NRMP and related entities as an objective aggregate measure of a COM's success in preparing its graduates for placement in clinical practice within the profession.

In keeping with USDE regulation 34 C.F.R. § 602.16(a)(2), the COCA will carefully monitor the data submission process for any endeavor on the part of a COM to manipulate these data reports to its advantage. A COM found in violation will be subject to sanctions as determined by the Commission.

Use of Achievement Data to Uphold Requirements

The DRC will review the data from the NBOME and the NRMP and related entities for each COM on an annual basis. The DRC will forward a report to the Commission, which will identify any needed action based on the following criteria:

A COM that reports a first-time pass rate on any one section of the COMLEX that is more than two standard deviations below the mean of all COM pass rates, <u>and</u> the pass rate is less than 90%, is subject to formal action by the Commission. If a COM is found to have fallen below this threshold in any of the previous three years, the Commission will not approve an application for a planned class size increase, an additional location, or a branch campus. In addition, the COM will be required to submit a detailed plan for how it will improve pass rates on its COMLEX examinations.

Similarly, a review by the DRC related to GME placement that reveals for any of the previous three years a placement rate below 95%, , will be subject to formal action by the Commission. In these cases, the Commission will not approve an application for a planned class size increase, an additional location, or a branch campus. The COM will also be required to submit a plan to the Commission delineating how it will improve GME placement rates.

The Commission's available scope of action as it monitors these achievement data is specified in the COMLEX-USA and GME Placement Rate Review Policies.

Related Federal Requirements:

34 C.F.R. § 602.16(a)(1)(i)

34 C.F.R. § 602.16(a)(2)