New Colleges of Osteopathic Medicine: Steps in Achieving Accreditation—An Update

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Submitted January 8, 2013; revision received February 5, 2013; accepted January 21, 2013. The American Osteopathic Association Commission on Osteopathic College Accreditation (AOA COCA) is recognized by the US Secretary of Education as the only accrediting agency for predoctoral osteopathic medical education. To maintain its recognition with the US Secretary of Education, AOA COCA is required to adhere to all federal laws and regulations associated with recognition of accrediting agencies. The authors discuss changes in the policies and procedures applicable to developing new colleges of osteopathic medicine (COMs) and discuss the COMs that have been granted Accreditation status since 2008. Also included is a review of AOA COCA-approved class sizes for accredited COMs.

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In 2008, the American Osteopathic Association's Division of Predoctoral Education announced a new approach to reporting in the annual osteopathic medical education theme issue of *The Journal of the American Osteopathic Association*. At that time, we stated that each year our reporting would focus on a major topic of interest for the American Osteopathic Association Commission on Osteopathic College Accreditation (AOA COCA). Our intention was to periodically reconsider each topic. In years 2008 through 2012, we covered the following topics:

- 2008: processes for establishing new colleges of osteopathic medicine (COMs)¹
- 2009: processes for application and review of substantive changes, including class size increases²
- 2010: continual review of COMs, including annual reporting³
- 2011: identification and training of evaluators who conduct the site visits to the COMs⁴
- 2012: process for review of the AOA COCA's standards and procedures for accreditation of COMs⁵

We now begin to revisit these major topics. These updates are meant to supplement previously published information; we will attempt to not repeat information already provided. For additional information on these topics, readers should refer to the articles listed above. 1-5

As an accrediting agency, AOA COCA serves both the osteopathic medical profession and the public at large. For example, AOA COCA is the only accrediting agency for predoctoral osteopathic medical education. The AOA COCA has been continuously recognized by the US Department of Education since its predecessor cabinet department began recognizing accrediting agencies in 1952. This recognition was renewed for the full 5-year period in July 2011. All accrediting agencies that seek to maintain their recognition with the US Secretary of Education are also required to adhere to all federal laws^{6,7} and regulations⁸ associated with recognition of accrediting agencies.

The AOA COCA publishes its standards and procedures in *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures*, or The Standards. The Standards can be found on the AOA COCA website, http://www.aoacoca.org.

In the present article, we report on the changes that have occurred in the processes and procedures of developing new COMs, which became effective on July 1 of 2010 and 2011. (Popp 29-36) In addition, we will provide an update on the COMs that have recently achieved Accreditation status, as well as those that are in the process of achieving Accreditation status. Finally, we will review AOA COCA—approved class sizes for accredited COMs.

Changes to the Procedures for Preaccreditation, 2010

On July 1, 2010, revisions to chapter 2, "Applicant and Accreditation Procedures," of The Standards⁹ became effective. These revisions included changes to the chapter's introduction, which now opens with the statement, "COM development is meant to be an orderly process that takes time, financial reserves and planning." To illustrate this orderly process, a table titled "Preliminary Timetable for Evaluation from Application Status to Initial Provisional Accreditation Status Decision" was added to The Standards. This table presumes that

COMs will be awarded Provisional Accreditation status (ie, permission to recruit students and begin instruction) no less than 2 years after AOA COCA receives a request from the new COM for Applicant status. Applicant status continues to be the first step for a new COM seeking accreditation. Colleges with Applicant status do not have the rights and privileges of colleges with Accreditation status, and they are not recognized by AOA COCA.

Changes were also made to the requirements for the escrowed reserve fund that an applicant COM must establish prior to receiving Preaccreditation status and that the COM must maintain until the graduation of its first class of students. The minimum required cash value for escrowed reserve funds increased from \$5 million to \$12.5 million to reflect the recently observed changes in tuition and class size authorizations being sought by recent applicants. In addition, the requirements now state that escrowed funds cannot be borrowed and must be "100% wholly owned assets of the COM or its parent institution."9(p31) It was also established that the reserve funds that the new COMs must have for operating expenses are to be 100% wholly owned assets of the COM or its parent institution and that the funds cannot be borrowed. These 2 new criteria were added to The Standards section on Feasibility Study and are reviewed by the AOA COCA Executive Committee as well as legal counsel before Preaccreditation status is granted. These conditions, along with other documented information, have to be met before Preaccreditation status can be authorized by AOA COCA.

Changes to the Procedures for Preaccreditation, 2011

Between July 1, 2010, and July 1, 2011, additional changes to chapter 2, "Applicant and Accreditation Procedures," were proposed to AOA COCA and discussed at a meeting of stakeholders at the Standards Forum on April 2, 2011. These changes, approved by AOA COCA in May 2011, became effective on July 1, 2011, and re-

sulted in further requirements for the establishment of new COMs. These changes were made because AOA COCA believed that the development of a new COM should be under the direction of the COM's dean, who would be expected to serve during its years of operation under Provisional Accreditation status. The AOA COCA believed that accelerating the development of a new COM without having this key leader in place could have detrimental effects. For these reasons, AOA COCA believed that establishing a timeline for dean oversight was in the best interest of new COM development.

The primary change to chapter 2 of The Standards in 2011 was the addition of a new section entitled "Role of the Dean." This section states that the dean of a new COM must be hired at least 6 months prior to the submission of the Feasibility Study required for consideration for Preaccreditation status. In creating this change, AOA COCA assumed that the dean would have an essential role in the development of the Feasibility Study, as well as any updates required to the Feasibility Study prior to a Provisional Accreditation site visit. The AOA COCA now declines to review a Feasibility Study that does not document the dean's leadership role in its preparation.

In addition to the section, "Role of the Dean," the Feasibility Study criteria were expanded to include the role of the administrative team for the developing COM. 9(p30) These new criteria (criteria 5 and 6) require that, in addition to the appointment of the dean, adequate staff support must be presented in the Feasibility Study, including the appointment of a chief executive officer and chief financial officer for the COM. The dean must also show that the organizational structure of the new COM, including the appointment of associate and assistant deans and a hiring timeline, is in place. It is now expected that all associate and assistant deans are under contract at the time the Preaccreditation status is approved by AOA COCA. The qualifications of the associate and assistant deans are now to be reviewed at the time of the Preaccreditation site visit.

The COMs that requested Applicant status after July 1, 2011, were expected to be in compliance with all revisions. Colleges that submitted their Feasibility Studies prior to May 1, 2011, were evaluated for their compliance with the new procedures in terms of making "good faith" efforts to have the positions referred to secured and to be in total compliance at the time of the initial Provisional Accreditation site visit.

The 2011 changes in chapter 2 required additional changes to the table "Preliminary Timetable for Evaluation from Applicant Status to Initial Provisional Accreditation Status Decision."9(p83) The table was constructed under the assumption that a new COM will begin instruction of students not less than 2 years after the Feasibility Study is accepted by the AOA COCA Executive Committee. The table depicts the time allotted for the appointment of the dean as well as the employment of the associate and assistant deans. Once Provisional Accreditation status has been granted to a new COM, the COM now has 5 years to achieve Accreditation status, which is the highest status with all rights and privileges. Colleges with Provisional Accreditation status are monitored by a site visit each year by a team of AOA COCA evaluators, and each COM must achieve Accreditation status prior to the graduation of its first class and no more than 5 years after achieving Provisional status.

New COMs

New COMs must complete 4 distinct phases before becoming fully accredited: Applicant, Preaccreditation, Provisional Accreditation, and Accreditation (*Table 1*). In the following section, we provide updates to the accreditation statuses of new COMs that have occurred since our 2008 article.¹

Accreditation Status

Since 2008, 5 new COMs have been granted Accreditation status. The A.T. Still University-School of Osteopathic Medicine in Arizona (Mesa), the Lincoln

Table 1.	
Steps in Accrediting a New College of O	steopathic Medicine

Status	Role and Purpose	Requirements	Privileges	Duration	
Applicant An entity is interested in developing a new COM.		Submission of a letter to AOA COCA that requests application status	None	2 or more years	
Preaccreditation	A COM may be expected to proceed to Provisional Accreditation status within 5 years.	Submission of a feasibility study for technical review by the AOA COCA Executive Committee	Recognition from AOA COCA	Up to 5 years	
Provisional Accreditation	A COM may be expected to begin instruction to a a class of specified size at a time certain.	An updated feasibility study that is reviewed for technical completeness An AOA COCA site visit that evaluates all standard domains Approval of the site visit report by AOA COCA Annual self studies and site visits to maintain status	Recognition from AOA COCA The authority to recruit students, accept students, and begin instruction	5 years	
Accreditation	A COM has satisfactorily educated its first class through the professional degree.	AOA COCA approval of a self-study and an onsite evaluation conducted in the fourth year of instruction An AOA COCA site visit that evaluates all standard domains Approval of the site visit report by AOA COCA Process repeated every 7 years or sooner if directed by AOA COCA to maintain status	Recognition from AOA COCA The authority to recruit, accept, and instruct students The authority to request substantive changes	Until the COM withdraws or AOA COCA denies status	

Abbreviations: AOA COCA, American Osteopathic Association Commission on Osteopathic College Accreditation; COM, college of osteopathic medicine.

Memorial University-DeBusk College of Osteopathic Medicine (Harrogate, Tennessee), and the Touro College of Osteopathic Medicine in New York City (New York) matriculated their first class of students during the 2007-2008 academic year. The COMs' first classes of students graduated from their respective schools in spring 2011 after each COM was granted Accreditation status at the spring 2011 AOA COCA meeting.

In addition, the Pacific Northwest University of Health Sciences, College of Osteopathic Medicine in Yakima, Washington, and the Rocky Vista University College of Osteopathic Medicine in Parker, Colorado, were granted initial Provisional Accreditation status at the fall 2007 meeting of AOA COCA and matriculated their first class of students in fall 2008. At the spring 2012 meeting of AOA COCA, both COMs were granted

Table 2.

AOA COCA-Approved Class Sizes for the Academic Years 2003-2004 Through 2012-2013

COMb	2003- 2004	2004- 2005	2005- 2006	2006- 2007	2007- 2008	2008- 2009	2009- 2010	2010- 2011	2011- 2012	2012- 2013
ATSU-KCOM	160	160	160	160	160	160	160	160	160	160
ATSU-SOMA	NA	NA	NA	NA	100	100	100	100	100	100
DMU-COM	205	205	205	205	205	205	205	205	205	205
KCUMB-COM	220	220	250	250	250	250	250	250	250	250
LECOM (LDP)	144	144	144	144	180	180	180	180	180	180
LECOM (PBLP)	40	40	40	40	40	40	40	40	40	40
LECOM (ISP)	30	30	30	30	30	30	30	30	30	30
LECOM- Bradenton (PBLP) ^c	NA	150	150	150	150	150	150	150	182	182
LECOM-Seton Hilld	NA	NA	NA	NA	NA	NA	104	104	104	104
LMU-DCOM	NA	NA	NA	NA	150	150	150	150	150	225
MSUCOM [®]	140	140	200	200	200	200	200	200	200	200
MSUCOM-DMC ^d	NA	NA	NA	NA	NA	NA	50	50	50	50
MSUCOM-MUC ^d	NA	NA	NA	NA	NA	NA	50	50	50	50
MWU/AZCOM	140	140	140	140	140	250	250	250	250	250
MWU/CCOM	160	160	160	160	160	160	206	206	206	206
NSU-COM	200	200	230	230	230	230	230	230	230	230
NYITCOM	260	260	260	260	260	260	260	260	260	260
NYITCOM (EPP)e	40	35	35	35	35	35	35	35	35	35
OSU-COM	88	88	88	88	88	88	97	106	115	115
OU-HCOM	100	100	100	100	100	140	140	140	140	140
PCOM	250	250	250	250	250	250	250	250	250	250
GA-PCOM°	NA	NA	80	80	80	80	80	80	125	125

(continued)

Abbreviations: AOA COCA, American Osteopathic Association Commission on Osteopathic College Accreditation; EPP, Émigré Physicians Program; ISP, Independent Study Program; LDP, Lecture-Discussion Pathway; NA, not applicable; PBLP, Problem-Based Learning Pathway.

Accreditation status and subsequently graduated their first classes of students.

Provisional Accreditation Status

Four new COMs have received Provisional Accreditation status since 2008. The William Carey University College of Osteopathic Medicine in Hattiesburg, Mississippi, matriculated its first class in fall 2010, and it anticipates graduating its first class in spring 2014. Three new COMs—the Alabama College of Osteopathic Medicine in Dothan, the Campbell University School of Os-

teopathic Medicine in Buies Creek, North Carolina, and the Marion University College of Osteopathic Medicine in Indianapolis, Indiana—were granted Provisional Accreditation status at the spring 2012 AOA COCA meeting. The Provisional Accreditation status was effective-July 1, 2012. All 3 COMs will each matriculate a first class of students in fall 2013.

Preaccreditation Status

At the winter 2012 AOA COCA meeting, the Liberty University College of Osteopathic Medicine in Lynch-

^a Information reflects actions taken by AOA COCA at its December 1-2, 2012, meeting.

^b The full names and locations of colleges of osteopathic medicine (COMs) are provided in Appendix 1 on pages 343-345.

 $^{^{\}mbox{\tiny c}}$ Branch campus. Parent institution is noted above.

^d Additional location. Parent institution is noted above.

Data have been updated from previous reports¹⁻⁵ for MSUCOM, 2003-2004 and 2004-2005; NYITCOM (EPP), 2003-2004; and TUNCOM, 2004-2005 and 2005-2006.

f Based in Oregon.

g The Portland location for WesternU/COMP-Northwest ceased operations when the Lebanon location opened in 2010.

Table 2 (continued).

AOA COCA-Approved Class Sizes for the Academic Years 2003-2004 Through 2012-2013^a

СОМь	2003- 2004	2004- 2005	2005- 2006	2006- 2007	2007- 2008	2008- 2009	2009- 2010	2010- 2011	2011- 2012	2012- 2013
PNWU-COM	NA	NA	NA	NA	NA	70	70	70	70	70
RVUCOM	NA	NA	NA	NA	NA	150	150	150	150	150
TouroCOM	NA	NA	NA	NA	125	125	125	125	125	125
TUCOM	125	125	125	125	125	125	125	125	125	125
TUNCOM ^{c,e}	NA	75	100	125	125	125	125	125	125	125
UMDNJ-SOM	100	100	100	100	100	100	150	150	150	150
UNECOM	115	115	115	115	115	115	115	115	115	115
UNTHSC/TCOM	125	125	125	175	175	175	200	225	250	250
UP-KYCOM	75	75	75	75	75	75	75	75	75	135
VCOM-Virginia	150	150	150	150	150	175	175	175	175	175
VCOM-Carolinas ^c	NA	150	150							
WCUCOM	NA	100	100	100						
WesternU/COMP	176	176	176	176	176	176	176	176	220	220
WesternU/COMP -Northwest ^{c,f}										
Portland ⁹	NA	30	30	30	30	30	30	30	NA	NA
Lebanond	NA	100	100							
WVSOM	96	96	96	200	200	200	200	200	200	200
Total	3199	3839	3614	3793	4204	4599	4933	5067	5442	5577
Change from previous year, net	171	250	225	179	411	395	334	134	330	135
Change from previous year, %	5.8	8.0	6.6	4.2	10.8	9.4	7.3	2.7	6.5	2.5

- ^a Information reflects actions taken by AOA COCA at its December 1-2, 2012, meeting.
- b The full names and locations of colleges of osteopathic medicine (COMs) are provided in *Appendix 1* on pages 343-345.
- Branch campus. Parent institution is noted above.
- d Additional location. Parent institution is noted above.
- Data have been updated from previous reports^{1.5} for MSUCOM, 2003-2004 and 2004-2005; NYITCOM (EPP), 2003-2004; and TUNCOM, 2004-2005 and 2005-2006.
- f Based in Oregon.
- g The Portland location for WesternU/COMP-Northwest ceased operations when the Lebanon location opened in 2010.

Abbreviations: AOA COCA, American Osteopathic Association Commission on Osteopathic College Accreditation; EPP, Émigré Physicians Program; ISP, Independent Study Program; LDP, Lecture-Discussion Pathway; NA, not applicable; PBLP, Problem-Based Learning Pathway.

burg, Virginia, was granted Preaccreditation status. This COM intends to matriculate its first class of students in fall 2014 if it is granted Provisional status.

secretary and assistant secretary. It is expected that 1 or more of these institutions will seek Preaccreditation status in the near future.

Applicant Status

The AOA COCA has received communications from several institutions that are considering establishing a COM. Although formal application has not been received by AOA COCA from any of these institutions as of the date of this publication, representatives from these institutions have indicated their interest to AOA COCA's

Recent Changes to Approved Class Sizes

For the past 10 academic years, AOA COCA–approved class sizes have steadily increased. During the 2003-2004 academic year, 19 COMs operating on 19 campuses were approved for 3199 total matriculants. During

the current 2012-2013 academic year, the aggregate class sizes were approved for 5577 new matriculants at 26 COMs, 4 branch campuses, and 4 additional locations, a total of 34 sites (*Table 2*).

The aggregate number of authorized matriculants in the approved class sizes increased by 2378 over the academic years 2003-2004 through 2012-2013, inclusive, for a 43% increase since the 2003-2004 academic year. The larger fraction of this increase—1359 authorized matriculates (57%) of the 2378 increase—was the result of the establishment of 6 new campuses, and the expansion of 8 existing campuses authorized by AOA COCA. The remaining fraction of 1019 authorized matriculants (43%) is accounted for by the expansion of class sizes at existing COM campuses.

During the 10-year period under discussion, the net increase in approved positions ranged from 231 in the 2003-2004 academic year (7.8% more than the previous year) to 395 in the 2008-2009 academic year (9.4% more than the previous year). In the 2012-2013 academic year, a total of 135 new approved positions were added to the approved class sizes at 2 schools (*Table 2*) for a 2.5% increase compared with the 2011-2012 academic year's total number of approved matriculants of 5442 students.⁵

Conclusion

Since 2008, several updates have been made to AOA COCA's standards and procedures that relate to establishing new COMs. By conducting ongoing comprehensive review of these documents, AOA COCA continues to ensure that accreditation processes reflect the best interest of new COM development.

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References

- Miskowicz-Retz KC, Williams A. New colleges of osteopathic medicine: steps in achieving accreditation. J Am Osteopath Assoc. 2008;108(3):121-125. http://www.jaoa.org/content/108/3/121.full. Accessed February 27, 2013.
- Williams A, Miskowicz-Retz KC. Evolution of colleges of osteopathic medicine: a discussion of the COCA's "substantive change" policies. J Am Osteopath Assoc. 2009;109(3):128-134. http://www.jaoa.org/content/109/3/128.full. Accessed February 27, 2013.
- Williams A, Miskowicz-Retz KC. Colleges of osteopathic medicine: the process of continuous evaluation. J Am Osteopathic Assoc. 2010;110(3):144-148. http://www.jaoa.org/content/110/3/144.full. Accessed February 27, 2013.
- Williams A, Miskowicz-Retz KC. Evaluation of colleges of osteopathic medicine: training for the evaluators. J Am Osteopathic Assoc. 2011;111(4):229-233. http://www.jaoa.org/content/111/4/229 .full. Accessed February 27, 2013.
- Williams A, Miskowicz-Retz KC. Continuous development and review of AOA COCA standards and procedures. J Am Osteopathic Assoc. 2012;112(4):189-194. http://www.jaoa.org/content /112/4/189.full. Accessed February 27, 2013.
- 6. Higher Education Act of 1965, 20 USC §1001 (1965).
- Higher Education Opportunity Act, Pub L No. 110-315, 122 Stat 3078 (2008). To be codified at 20 USC §1001.1 et seq.
- The Secretary's Recognition of Accrediting Agencies, 34 CFR §602 (2011).
- American Osteopathic Association Commission on Osteopathic College Accreditation. Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures. Chicago, IL: American Osteopathic Association; 2012. http:// www.osteopathic.org/inside-aoa/accreditation/predoctoral%20 accreditation/Documents/COM-Accreditation-Standards -Effective-7-1-2012.pdf. Accessed February 27, 2013.

Editor's Note: This JAOA theme issue on osteopathic medical education includes annual updates from the American Osteopathic Association's departments of accreditation and education. Last year's article on the American Osteopathic Association Commission on Osteopathic College Accreditation can be accessed online at http://www.jaoa.org/content/112/4/189.full.

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