

Colleges of Osteopathic Medicine: Substantive Changes—An Update

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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 osteopathic predoctoral education. To maintain its recognition with the US Secretary of Education, the AOA COCA is required to adhere to all federal laws and regulations associated with the recognition of accrediting agencies. The authors discuss changes in the policies and procedures applicable to review of substantive changes in existing colleges of osteopathic medicine. Also included is a review of AOA COCA–approved class sizes of the accredited colleges of osteopathic medicine.

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Since 2008, the annual osteopathic medical education theme issue of *The Journal of the American Osteopathic Association* has included a report by the American Osteopathic Association's Division of Predoctoral Education on major topics of interest related to the American Osteopathic Association Commission on Osteopathic College Accreditation (AOA COCA).¹⁻⁶ The topics and their order of presentation were identified in last year's article in this series.⁵ This year, we review the policies and procedures for substantive change, focusing on updates that have taken place since publication of the 2009 article on this topic.⁶ Specifically, we discuss changes in criteria that colleges of osteopathic medicine (COMs) must meet when requesting a substantive change, a toolkit that the AOA COCA has recently started using to evaluate substantive change requests, modifications to the monitoring process for approved substantive changes that were established to reflect the criteria changes, an overview of substantive change requests made by COMs and acted on by the AOA COCA between January 2009 and December 2013, and processes for reconsideration and appeal of substantive changes denied by the AOA COCA.

Substantive Change

Accreditation Process

The AOA COCA is recognized by the United States Department of Education (USDE) as the agency responsible for making accreditation decisions for COMs. As such, the AOA COCA is required to adhere to all federal laws^{7,8} and regulations⁹ associated with this status. Among these laws and regulations is the establishment of policies and procedures for approving substantive changes of COMs. The AOA COCA publishes its standards and procedures in *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures*, or *The Standards*.¹⁰

The AOA COCA recognizes 10 types of substantive change (*Figure 1*). Each type requires approval before a COM can proceed with the change.^{10(p62)} Substantive changes 1 through 6 and 10 have remained unchanged since 2009. In July 2010, substantive changes 7, 8, and 9 were added to The Standards in order for the AOA COCA to be in compliance with USDE requirements. These additions addressed the following issues:

7. If a COM wants to contract with an institution that is not certified to participate in programs authorized under the Higher Education Act⁷ of 1965 and if that COM wants to offer more than 25% of its programs through the partner institution, the COM must inform the AOA COCA of its intention to create

1. Any change in the established mission or objectives or location of an institution
2. Any change in legal status or form of control of the institution
3. Addition of instruction that represents a significant departure, in terms of curriculum content or method of delivery, from the curriculum as offered at the last on-site evaluation of the institution
4. A change from clock hours to credit hours or vice versa
5. A substantial increase in the number of clock hours awarded for completion of the curriculum
6. Establishment of an additional location geographically apart from the main campus, including a branch campus
7. Contracting with an institution that is not authorized under the Higher Education Act of 1965³ and offering more than 25% of its programs through that institution
8. Acquisition of any other institution or program or location of another institution
9. Addition of a permanent location at which a teach-out is being conducted for students of another institution that has ceased operations
10. Any anticipated increase in class size

Figure 1. Types of substantive change recognized by the American Osteopathic Association Commission on Osteopathic College Accreditation.

this partnership and request a substantive change at least 18 months before offering instruction at the partner institution’s facilities.

8. If a COM wishes to acquire or merge with another COM, it must submit a written request to the AOA COCA at least 18 months before offering instruction.
9. If a COM wants to add a permanent location at a site where a teach-out is being conducted for students of another COM that has ceased operations before all students have completed their program of study, that COM must notify the AOA COCA of its intention to acquire the closed COM at least 18 months before it wishes to add the site as a permanent location.

Requests for substantive change must be submitted to the AOA COCA according to the schedule guideline in “Table 6a: Substantive Change Submission Guidelines” in The Standards.^{10(p63)} Each substantive change has minimum timelines for the notification and submission of supporting materials, as well as a suggested timeline for the AOA COCA to review the materials. The suggested timelines are set up to allow substantive changes to be approved in time for implementation at the beginning of an academic year. These timelines are suggestions; a substantive change may be approved at any AOA COCA meeting.

Revisions to Standards

At the April 2012 meeting of the AOA COCA, new and revised standards were approved. Most of these new and revised standards were on the subject of graduate medical education (GME) and the new Standard 8: GME Outcomes. These additions and revisions were incorporated into The Standards and became effective on July 1, 2013.¹⁰ As a result of these changes, COMs now need to address GME outcomes when they are requesting a substantive change. Requests for substantive change in the following areas were affected:

- additional locations
- class size increases
- branch campuses

In each of these areas, the following new criterion was added to the existent criteria that a COM must address in its presentation to the AOA COCA when requesting a substantive change^{10(p68)}:

A GME feasibility report (incorporating the retrospective GME Accountability Report outcome metrics of Standard 8.3) that demonstrates the expected placement of the COM's current and prospective graduates in GME positions, including [osteopathic graduate medical education] positions. In addition, the COM must demonstrate educational planning and noted progress in generating postdoctoral training opportunities. ... A COM must demonstrate the feasibility of success for GME placement of its students in order to be approved for the substantive change.

To assess whether a COM that is submitting a request for substantive change clearly demonstrates the criteria for GME and clinical rotations (discussed in our 2009 article⁶), the AOA COCA directed AOA COCA staff to develop a toolkit to collect data from COMs. The purpose of the toolkit is to provide the AOA COCA with a clear, consistent picture of clinical rotations and GME planning and progress to determine if the criteria for substantive change have been met. In addition, the toolkit provides a consistent way for COMs to assemble and present data in support of their substantive change request to the AOA COCA so that each COM will be evaluated using the same benchmarks.

Colleges of osteopathic medicine began using the toolkit in early 2013, when several requests for additional locations were submitted for review by the AOA COCA at their May 2013 meeting. The data analyst on AOA COCA staff assisted the COMs in collecting and submitting the data and in creating pivot tables and charts to illustrate the data. The toolkit was found to be very helpful to AOA COCA Commissioners, as it ensured

COMs were using a uniform method of calculating and demonstrating progress and planning for GME and clinical rotations. The toolkit will be used in the future by all COMs requesting substantive changes that require GME and clinical rotation information. The data analyst on AOA COCA staff will continue to assist COMs in using the toolkit, which is available by request.

Monitoring a Substantive Change

After a substantive change has been granted, the AOA COCA begins monitoring the substantive change. By monitoring a substantive change, the AOA COCA ensures that the criteria that were met for the substantive change to be granted continue to be met after the substantive change has taken place. The monitoring also ensures ongoing compliance with AOA COCA accreditation standards that are required to be met when the substantive change is initially presented.

There are 2 areas in monitoring an approved substantive change that have been modified since 2009; all others have remained the same. Descriptions of all areas are available in the monitoring schedule, "Table 6b: Substantive Change – Monitoring," which can be found in The Standards.^{10(pp74-75)} The first monitoring change is the addition of reporting on Standards 8.1, 8.2, and 8.3 from Standard 8: GME Outcomes. Because the criteria for granting a substantive change for an additional location, branch campus, or class size increase requires COMs to demonstrate "planning and noted progress in generating graduate medical education opportunities,"^{10(p32)} COMs are now required to demonstrate that these Standards are met as proposed in the original substantive change request on a focused site visit in year 3 of the substantive change and in a progress report in year 4 of the substantive change. Compliance is determined by a site visit team for the focused site visit and by AOA COCA Commissioners for the progress report. The AOA COCA continues to monitor finances, facilities, and faculty for substantive changes in a focused site visit in year 1 and a progress report in year 2 of the substantive change.

The second change to the monitoring process that has occurred since 2009 is the addition of a focused site visit in year 3 of the substantive change. In year 3, when clinical rotations begin for the COM that requested the new branch, additional location, or COM class size increase, a focused site visit is scheduled to monitor compliance with Standards 6.8 through 6.13 on clerkship training^{10(pp23-24)} so that the COM can demonstrate that it has “adequate clinical training sites”^{10(p67)} available, as stated in the substantive change request. This change in the monitoring process was made to better time onsite visits with the implementation of clerkship rotations. This change did not reduce the amount of monitoring, but rather made the monitoring process more efficient and timely. The focused site visit team reviews the Standards on clerkship training, as well as the new Standard 8: GME Outcomes, to monitor compliance. In year 4, the COM submits a progress report to the AOA COCA on Standards 6.8 through 6.13 and Standards 8.1, 8.2, and 8.3.^{10(pp25-26)} This progress report is reviewed by the AOA COCA commissioners for compliance.

Reconsideration and Appeal

When a COM is denied a substantive change request, the COM may request a reconsideration of the AOA COCA’s decision no more than 30 days after receiving notification of the decision.^{10(p52)} Reconsideration hearings occur before all AOA COCA commissioners during a regularly scheduled AOA COCA meeting. After the hearing, the AOA COCA makes its decision. If the COM’s substantive change request is denied again, the COM may request an appeal of the decision within 60 days of receiving notification of the request for reconsideration.^{10(p53)} The appeal is heard before an independent COM Appeal Panel within 90 days after the AOA COCA receives the request for an appeal hearing. The COM Appeal Panel may take 1 of the following actions: sustain the original action of the AOA COCA; amend the original action of the AOA COCA; reverse the original action of the AOA COCA; or remand the original action of the AOA COCA back to the AOA

COCA for reconsideration.^{10(p53)} All COM reconsideration or appeal requests must be made by a COM’s chief executive officer, chief academic officer, or other appropriate authority.

Substantive Change Activity: 2009-2013

During the period between January 1, 2009, and December 31, 2013, 17 COMs submitted 34 substantive change requests to the AOA COCA. Thirty of the 34 requests were approved, whereas the remaining 4 were either denied or withdrawn because the COM chose to submit a de novo request.

Planned class size increases were the most frequently requested substantive changes, with 12 requests during this period. This finding is consistent with the previous 5-year period (ie, 2004 to 2008), as reported in our 2009 article.⁶ Other requests included changes to mission statements (4), curriculums (3), additional locations (3), branch campuses (2), legal statuses (2), and class sizes (unplanned increase) (2). Additionally, 1 COM requested a change in clock hours. Compared with the previous 5-year period,⁶ substantive change requests for mission statements have risen. There has also been a slight increase in substantive change requests for branch campuses and additional locations. Overall, however, the number of substantive change requests has decreased (from 42 in 2004-2008 to 34 in 2009-2013).

The 5 denied requests were for 1 additional branch campus, 3 class size increases, and 1 change to a mission statement, which was later approved (*Figure 2*).

Recent Changes to Approved Class Size

For the past 10 academic years, AOA COCA–approved class sizes have steadily increased. During the 2004-2005 academic year, 21 COMs operating on 22 campuses were approved for 3499 total matriculants. During

the current 2013-2014 academic year the aggregate class sizes were approved for 6142 new matriculants at 29 COMs, 4 branch campuses, and 4 additional locations—a total of 37 sites (Table).

The aggregate number of authorized matriculants in the approved class sizes increased by 2643 over the academic years 2004-2005 through 2013-2014, inclusive, for a 57% increase since the 2004-2005 academic year. A large percentage of this increase—2064 of 2643 authorized matriculants (78%)—was the result of the establishment of 9 new campuses and the expansion of 5 existing campuses authorized by the AOA COCA. The remaining percentage (579 authorized matriculants [22%]) was a result of the expansion of class sizes at existing COM campuses.

During the 10-year period under discussion, the net increase in approved positions ranged from 255 in the 2004-2005 academic year (8.1% more than the previous year) to 565 in the 2013-2014 academic year (10% more than the previous year). In the 2013-2014 academic year, a total of 110 new approved matriculants were added to the approved class sizes at 2 schools (Table) for a 1.21% increase compared with the 2012-2013 academic year's total number of 135 new approved matriculants.

Conclusion

Since 2009, several updates have been made to the AOA COCA's standards and procedures that relate to substantive changes. By conducting an ongoing comprehensive review of these documents, the AOA COCA continues to ensure that accreditation processes reflect the best interest of new COM development.

Acknowledgment

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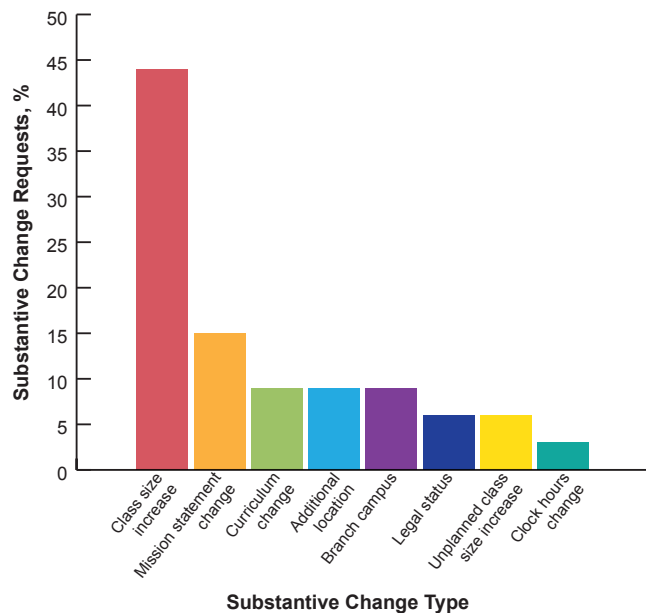


Figure 2. Substantive change requests submitted to the American Osteopathic Association Commission on the Osteopathic College Accreditation by colleges of osteopathic medicine from January 2009 through December 2013 (N=34).

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Table.
AOA COCA-Approved Class Sizes for Academic Years 2004-2005 Through 2013-2014^a

COM ^b	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
ACOM	NA	NA	NA	NA	NA	NA	NA	NA	NA	150
ATSU-KCOM	160	160	160	160	160	160	160	160	160	160
ATSU-SOMA	NA	NA	NA	100	100	100	100	100	100	100
CUSOM	NA	NA	NA	NA	NA	NA	NA	NA	NA	150
DMU-COM	205	205	205	205	205	205	205	205	205	205
KCUMB-COM	220	250	250	250	250	250	250	250	250	250
LECOM (LDP)	144	144	144	180	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	150	150	150	150	150	150	150	182	182	182
LECOM-Seton Hill ^d	NA	NA	NA	NA	NA	104	104	104	104	104
LMU-DCOM	NA	NA	NA	150	150	150	150	150	225	225
MSUCOM ^e	140	200	200	200	200	200	200	200	200	200
MSUCOM-DMC ^d	NA	NA	NA	NA	NA	50	50	50	50	50
MSUCOM-MUC ^d	NA	NA	NA	NA	NA	50	50	50	50	50
MU-COM	NA	NA	NA	NA	NA	NA	NA	NA	NA	150
MWU/AZCOM	140	140	140	140	250	250	250	250	250	250
MWU/CCOM	160	160	160	160	160	206	206	206	206	206
NSU-COM	200	230	230	230	230	230	230	230	230	230
NYIT-COM	260	260	260	260	260	260	260	260	260	260
NYIT-COM (EPP) ^e	35	35	35	35	35	35	35	35	35	35

(continued)

**Table (continued).
AOA COCA-Approved Class Sizes for Academic Years 2004-2005 Through 2013-2014^a**

COM ^b	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
OSU-COM	88	88	88	88	88	97	106	115	115	115
OU-HCOM	100	100	100	100	140	140	140	140	140	140
PCOM	250	250	250	250	250	250	250	250	250	250
GA-PCOM ^c	NA	80	80	80	80	80	80	125	125	125
PNWU-COM	NA	NA	NA	NA	70	70	70	70	70	135
RowanSOM	100	100	100	100	100	150	150	150	150	150
RVUCOM	NA	NA	NA	NA	150	150	150	150	150	150
TouroCOM	NA	NA	NA	125	125	125	125	125	125	125
TUCOM	125	125	125	125	125	125	125	125	125	125
TUNCOM ^{c,e}	75	100	125	125	125	125	125	125	125	125
UNECOM	115	115	115	115	115	115	115	115	115	165
UNTHSC/TCOM	125	125	175	175	175	200	225	250	250	250
UP-KYCOM	75	75	75	75	75	75	75	75	135	135
VCOM-Virginia Campus	150	150	150	150	175	175	175	175	175	175
VCOM-Carolinas Campus ^c	NA	NA	NA	NA	NA	NA	NA	150	150	150
WCUCOM	NA	NA	NA	NA	NA	NA	100	100	100	100
WesternU /COMP	176	176	176	176	176	176	176	220	220	220
WesternU /COMP- Northwest CNT ^{c,f}										
Portland ^g	30	30	30	30	30	30	30	NA	NA	NA
Lebanon ^d	NA	NA	NA	NA	NA	NA	NA	100	100	100
WVSOM	96	96	200	200	200	200	200	200	200	200
Total	3389	3614	3793	4204	4599	4933	5067	5442	5577	6142
Change From Previous Year, net	255	225	179	411	395	334	134	375	135	565

^a Information reflects actions taken by the American Osteopathic Association Commission on Osteopathic College Accreditation (AOA COCA) at its December 7-8, 2013, meeting.

^b The full names and locations of colleges of osteopathic medicine (COMs) are provided in *Appendix 4* on pages 317-319.

^c Branch campus. Parent institution is noted above.

^d Additional location. Parent institution is noted above.

^e Data have been updated from previous reports¹⁻⁶ for MSUCOM, 2004-2005; NYITCOM (EPP), 2004-2005; and TUNCOM, 2004-2005 and 2005-2006. Totals have also been updated from previous reports for 2004-2005 and 2005-2006, and net change from previous year has been updated for 2004-2005, 2005-2006, 2006-2007, and 2011-2012.

^f Based in Oregon.

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

Abbreviations: EPP, Émigré Physicians Program; ISP, Independent Study Program; LDP, Lecture-Discussion Pathway; NA, not applicable; PBLP, Problem-Based Learning Pathway.