142 E. Ontario St., Chicago, IL 60611-2864 ph (312) 202-8000 | (800) 621-1773

#### COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

By email: pcrone@westernu.edu

CERTIFIED MAIL: 7005 3110 0000 0718 8269

September 16, 2015

Paula M. Crone, DO
Dean
Western University of Health Sciences
College of Osteopathic Medicine of the Pacific
309 East Second Street, College Plaza
Pomona, CA 91766-1854

Dear Dr. Crone:

At its August 29-30, 2015 meeting, the American Osteopathic Association's Commission on Osteopathic College Accreditation (COCA) reviewed the site visit report from the comprehensive evaluation conducted at the Western University of Health Sciences / College of Osteopathic Medicine of the Pacific (WesternU/COMP) in Pomona, CA, and its additional location Western University of Health Sciences / College of Osteopathic Medicine of the Pacific-Northwest (WesternU/COMP-Northwest) in Lebanon, OR, on March 16-20, 2015. We thank you for being present to offer testimony at the meeting.

The site visit team identified no (0) Requirements, five (5) Recommendations, and six (6) Commendations. At the meeting, after review of the site visit report and oral testimony, the COCA deliberated in executive session. On motion, with second, the COCA voted to accept the site visit report without amendments.

At the meeting, the COCA granted WesternU/COMP continuing Accreditation status. Accreditation is subject to comprehensive on-site evaluation at 7-year cycles. We anticipate that your next comprehensive on-site evaluation will occur in the spring of 2022.

We ask that you thoroughly review the attached site visit report. We strongly encourage you to review the recommendation page. This page highlights any recommendations the team may have written. Recommendations are consultative in nature, and while we would like recommendations to be reviewed and acted upon by the colleges of osteopathic medicine, they are not requirements and do not need to be addressed as such.

Paula M. Crone, DO September 16, 2015 Page 2

If you have any questions, please do not hesitate to contact me (312-202-8048; 800-621-1773 Ext. 8048; fax 312-202-8209; e-mail acraftdo@osteopathic.org). You may also contact Andrea Williams, MA, Assistant Secretary to the COCA (312-202-8096; awilliams@osteopathic.org), or feel free to leave a message with Maria Kozicz, Specialist, Accreditation (312-202-8124).

Sincerely

Alissa Craft, DO, MBA

Secretary, Commission on Osteopathic College Accreditation

C: Gary Gugelchuk, PhD, Interim President, Provost and Chief Operating Officer, Western University of Health Sciences Kenneth H. Johnson, DO, FAAO, Chair, Commission on Osteopathic College Accreditation John B. Bulger, DO, MBA, Vice-Chair, Commission on Osteopathic College Accreditation Andrea Williams, MA, Assistant Secretary, Commission on Osteopathic College Accreditation

Annette Puzan, MBA, Manager, Predoctoral Education

File

# COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

# VISITING TEAM REPORT

Comprehensive Site Visit Report

WESTERN UNIVERSITY OF HEALTH SCIENCES
COLLEGE OF OSTEOPATHIC MEDICINE OF THE PACIFIC
Pomona, CA

WESTERN UNIVERSITY OF HEALTH SCIENCES
COLLEGE OF OSTEOPATHIC MEDICINE OF THE PACIFIC-NORTHWEST
Lebanon, OR

March 16-20, 2015

FINAL REPORT

Printed: 9/16/15

This report was prepared by all members of the on-site team and reviewed for comment by the Western University of Health Sciences/College of Osteopathic Medicine of the Pacific.



# TABLE OF CONTENTS

This site visit report is organized into the following sections:

Summary of Due Dates for Continuing and New Requirements	3
Purpose of Visit/History of Accreditation	4
Review of Compliance with Standards	9
Summary of Requirements	39
Commendations	40
Summary of Recommendations	41
Roster of Visiting Team and Assignments	42
Appendix A - Individuals Interviewed and Documents Reviewed	43
Annendix R - Rackground Information Sheet	45

## SUMMARY OF DUE DATES FOR CONTINUING AND NEW REQUIREMENTS

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

This summary is designed to provide an overview of the standard sections that the on-site evaluation team found to be out of compliance and need further review. Each Requirement must be submitted to the Commission on Osteopathic College Accreditation (COCA) in the form of a Progress Report by the due date cited. Please refer to the on-site evaluation report for specific information on these standard sections.

There were no Requirements cited on this visit.

## **COMPREHENSIVE SITE VISIT**

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

## **Purpose of Visit**

A visiting team of the AOA Commission on Osteopathic College Accreditation (COCA) conducted a Comprehensive Visitation accreditation on-site evaluation to the Western University of Health Sciences College of Osteopathic Medicine of the Pacific (WesternU/COMP), located in Pomona, CA on March 16-17, 2015, and to its Additional Location, Western University of Health Sciences College of Osteopathic Medicine of the Pacific-Northwest (WesternU/COMP-NW), located in Lebanon, OR, on March 18-20, 2015. This visit was conducted for the purposes of reviewing all standards of accreditation.

## **History of Accreditation**

WesternU/COMP was founded as a private, non-profit graduate health care educational institution in 1977; gained Provisional Accreditation in 1978; and was awarded Accreditation status in 1982, prior to the graduation of its charter class. WesternU/COMP is located in Pomona, California, which is approximately 35 miles east of Los Angeles, near the foothills of the San Gabriel Mountains. WesternU/COMP is organizationally part of the Western University of Health Sciences, which is regionally accredited by the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges.

A visiting team of the AOA Council on Predoctoral Education (CPE) conducted a Comprehensive accreditation on-site evaluation to WesternU/COMP on April 3-6, 2001. This visit was for purposes of reviewing all standards of accreditation. This on-site visit was conducted in accordance with the standards and policies and procedures for accreditation as described in the *Accreditation of Colleges of Osteopathic Medicine*, 1999. This evaluation also reviewed Recommendations from the previous Full Accreditation site visit on May 10-13, 1994. The team wrote four Requirements as part of the site visit report.

On January 16, 2002, WesternU/COMP submitted a Progress Report to the CPE addressing Standard III.A.2.1 (1) and Standard V.A.1 and on March 12, 2002, WesternU/COMP submitted a Progress Report addressing Standards II.A and III.A.2 (2). At the April 13, 2002, meeting of CPE, it was resolved that those standards were not met. WesternU/COMP was directed to submit a Progress Report on October 1, 2002, addressing the same standards.

On July 24, 2002, WesternU/COMP submitted a Progress Report to the CPE which addressed Requirements II.A.; III.A.2.(1); III.A.2.(2); and V.A.1. At the October 26, 2002 meeting of the BPE, the Progress Report was accepted and the standards were met.

On March 28, 2003, WesternU/COMP submitted a request for a substantive change to develop a WesternU/COMP Northwest Track and increase the class size by 30 students. At its meeting of October 3-4, 2003, the BPE approved this request to begin with the 2004-2005 academic year. A Focused Visitation for the purpose of reviewing the faculty and facilities resources to be available for the Northwest Track would be conducted at WesternU/COMP and reported back to the BPE by its January 2004 meeting. In addition, a Focused Visitation would be conducted Year 1 (academic year 2004-2005) and Year 3 (academic year 2006-2007) of implementation of the class size increase.

At its January 17, 2004 meeting, the COCA accepted the report from a Focused Visitation to WesternU/COMP, conducted on November 7, 2003. In order to evaluate faculty and facilities resources, the following standards were reviewed: II.A.4; II.C; III.A; III.A.2; and VI.A. All standards were met.

On January 14, 2005, a visiting team of the COCA conducted a Focused Visitation to WesternU/COMP for the purpose of monitoring a substantive change to develop a WesternU/COMP Northwest Track and increase the class size by 30 students. As set forth in the Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures (effective January 2005) the following standards were reviewed at that visit:

Standard Two: Governance, Administration, and Finance – Standard 2.2

Standard Three: Facilities, Equipment, and Resources – Standards 3.1 through 3.3

Standard Four: Faculty – Standards 4.1 and 4.1.1

Standard Five: Students – Standard 5.5

Standard Six: Curriculum – Standards 6.6 and 6.9

At its April 30-May 1, 2005 meeting, the COCA accepted a site visit report from the Focused Visitation to WesternU/COMP, conducted on January 14, 2005. As a result of the site visit report, the "Year 1" visitation requirement to be conducted during the 2004-2005 academic year was met.

A visiting team of the COCA conducted a Focused Visitation to the WesternU/COMP–Northwest Track Program (NWT) offices, located at 2121 SW Broadway, Suite 380 in Portland, OR, on January 22-23, 2007. This visit was conducted for the purpose of monitoring a substantive change as set forth in the *Standards for the Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures* (effective October 1, 2006), and the following standards were reviewed.

Standard Three: Facilities, Equipment and Resources – Standard 3.3

Standard Four: Faculty – Standard 4.1.2

Standard Six: Curriculum – Standards 6.6, 6.9, 6.11 and 6.12

At its April 21-22, 2007 meeting, the COCA accepted the report from the Focused Visitation, conducted on January 22-23, 2007 to the Northwest Track program in Portland, OR. The site visit team identified one new Requirement in Standard Four: Faculty (4.1.2). A Progress Report was due by June 30, 2007.

At its August 25-26, 2007 meeting, the COCA accepted the Progress Report from the WesternU/COMP Northwest Track Program, dated June 22, 2007. As a result of the Report, Standard 4.1.2 was met.

A visiting team of the COCA conducted a Comprehensive accreditation site visit evaluation to WesternU/COMP on January 30-February 1, 2008. This visit was conducted with a full team of evaluators and in accordance with the standards and policies and procedures for accreditation as described in the *Accreditation of Colleges of Osteopathic Medicine: COM Accreditation Standards and Procedures (effective: July 1, 2007)*. All standards of accreditation were addressed at this site evaluation.

At its April 26-27, 2008 meeting, the COCA granted WesternU/COMP continuing Accreditation status. The site visit team identified three (3) Requirements, four (4) Recommendations and two (2) Commendations during the site visit. A Progress Report addressing the requirements was due by July 1, 2008.

At its September 6-7, 2008 meeting, COCA accepted the Progress Report from WesternU/COMP, dated June 12, 2008. The COCA determined that some of the standards that were addressed in that Report were met as required for that report. Those standards were in the following domains: Standard Four: Faculty (4.4) and Standard Five: Students (5.2.2). The COCA also determined that one of the standards addressed in that Progress Report was **not** met as required for that report. This standard was in the following standard domain: Standard Two: Governance, Administration, and Finance (2.8). A Progress Report addressing Standard 2.8 was due by November 3, 2008.

At its December 13-14, 2008 meeting, the COCA accepted the Progress Report dated September 30, 2008. After review the COCA determined that the standard that Standard 2.8 addressed in that Progress Report was met as required for that report.

In a letter dated August 11, 2008, WesternU/COMP submitted a request for a Substantive Change-Additional Location/Class Size Increase for 100 students to begin at the proposed location Lebanon, OR, in August 2011. At the time, WesternU-COMP had an approved class size of 30 students at its Northwest Track location in Portland, OR. For purposes of assignment, the 30 students in the Northwest Track would complete their education, along with that of 70 additional students at the new site in Lebanon, OR.

In addition, WesternU/COMP requested a class size increase for the Pomona campus. At that time, the class size in Pomona was 176 students. WesternU/COMP requested to increase the class size by 44 students for a total of 220 at the Pomona campus. The combined total number of students at the main campus in Pomona, CA, and the additional location in Lebanon, OR, would be 320 students.

At its meeting on December 13-14, 2008, the COCA reviewed the WesternU/COMP request for a Substantive Change–Class Size Increase at the Pomona campus and the request for Substantive Change–Additional Location/Class Size Increase for Lebanon. Based upon the written documentation, and the testimony provided, the COCA approved all three substantive changes as specified in the table below.

Western University of the Health Sciences College of Osteopathic Medicine of the Pacific (WesternU/COMP)			
Site	Currently approved students (December 2009)	Change in number of approved students	New Approved students (entering Fall 2011)
Pomona, CA (parent campus)	176	+ 44	220
Portland, OR (Northwest Track)	30	- 30	0
Lebanon, OR (additional location)	0	+ 100	100
TOTAL =	206	+ 114	320

The monitoring for this Substantive Change included a Focused Visitation during the first year of implementation to both the Pomona and Lebanon campuses to review the following standards:

Standard Two: Governance, Administration and Finance – 2.3 Standard Three: Facilities, Equipment and Resources – all

Standard Four: Faculty (4.1, 4.1.1 and 4.1.2)

A visiting team of the COCA conducted a Focused Visitation to WesternU/COMP, in Pomona, CA on January 17, 2012, and to its Additional Location, WesternU/COMP-NW, in Lebanon, OR, on January 18-19, 2012. The following Standards were reviewed during this site visit: 2.3, 3.1, 3.1.1, 3.2, 3.3, 4.1, 4.1.1 and 4.1.2. At its April 21-22, 2012 meeting, the COCA reviewed and accepted the site visit report from the Visitation. The site visit team identified no (0) Requirements, one (1) Recommendation, and one (1) Commendation during the visit.

At its September 8-9, 2012 meeting, the COCA voted to add the Additional Location, WesternU/COMP-NW in Lebanon, OR, into the accreditation of the parent institution, WesternU/COMP in Pomona, CA. Future comprehensive evaluations of the WesternU/COMP will include both the parent campus in Pomona, CA, and the Lebanon, OR, campus.

At its September 7-8, 2013 meeting, the COCA reviewed and accepted the Progress Report dated July 1, 2013 submitted as part of the monitoring for WesternU/WesternU/COMP's Substantive Change—Class Size Increases in Pomona, CA, and Lebanon, OR. After review and deliberation, the COCA determined that Standards 4.1 and 4.1.1 were not met. The COCA also determined that the remaining standards addressed in that Progress Report were met as required for that report. Another Progress Report was due by November 1, 2013.

At its December 7-8, 2013 meeting, the COCA reviewed and accepted the Progress Report dated October 31, 2013 for WesternU/WesternU/COMP's Substantive Change–Class Size Increases in Pomona, CA, and Lebanon, OR. After review and deliberation, the COCA determined that the standards addressed in the Progress Report were met as required for that report.

A visiting team of the COCA conducted a Focused Visitation accreditation on-site evaluation to the WesternU/COMP in Pomona, CA, on January 29, 2014, and to its Additional Location WesternU/COMP-NW in Lebanon, OR, on January 30-31, 2014. This "Year 3 Focused Visitation" was conducted for the purpose of reviewing the following standards and monitoring procedures for a Substantive Change-Additional Location/Class Size Increase to include the development of an Additional Location in Lebanon, Oregon and for a Substantive Change-Class Size Increase for WesternU/COMP:

Standard Six: Curriculum – clerkship training (6.8-6.13) Standard Eight: GME Outcomes (8.1, 8.2 and 8.3)

The team on this visit consisted of a Team Chair/Clinical Education evaluator and a Team Secretary. The site visit team identified one (1) Requirement (6.8), one (1) Commendation and five (5) Recommendations. At its May 3-4, 2014 meeting, the COCA reviewed and accepted the report without amendments.

WesternU/COMP submitted a Progress Report dated July 1, 2014. This Progress Report addressed Standard 6.8 which was determined to be not met at the time of the Focused Visitation conducted on January 29-31, 2014. At its September 6-7, 2014 meeting, the COCA accepted the report and determined that Standard 6.8 was met as required for that report.

#### REVIEW OF COMPLIANCE WITH STANDARDS

## Standard One: MISSION, GOALS, AND OBJECTIVES

#### Introduction

Western University of Health Sciences College of Osteopathic Medicine of the Pacific (Western/COMP) has a long term mission which is easily accessed on Western University's website and in its College catalog and Policies and Procedures manual. Western University and WesternU/COMP strategic planning documents reference core elements of the COM's mission with high priorities given to research and clinical education agendas. Distinctive osteopathic healthcare is addressed through robust clinical opportunities at both the Pomona and Lebanon campuses, as well as through robust community outreach agendas on both campuses. WesternU/COMP's connection to OPTI-West Educational Consortium is reflected in the COM's strategic planning documents. There was one Commendation written for *Standard One: Mission, Goals, and Objectives*.

## **Current Findings - Standard 1.1**

WesternU/COMP has a mission statement which includes all the elements required by COCA and also includes cultural sensitivity and compassion. The mission statement is linked to AOA's seven core competencies: medical knowledge, osteopathic philosophy, patient care, professionalism, interpersonal and communication skills, practice based learning and improvement, and systems based practice. The Self-Study provided evidence of periodic mission review and revision approved by the COM's accreditation cabinet and faculty. This Standard is met.

## **Current Findings - Standard 1.1.1**

WesternU/COMP's Self-Study provided evidence that its Mid-Cycle report was submitted on February 15, 2012 and accepted by COCA on December 2, 2012. This Standard is met.

#### **Current Findings - Standard 1.2**

WesternU/COMP's Self-Study contained evidence of its authorization to function from the Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities and Oregon's Higher Education Coordinating Commission Office of Degree Authorization. This Standard is met.

#### **Current Findings - Standard 1.3**

Western University and WesternU/COMP have engaged in numerous processes linking learning objectives to strategic planning processes. These activities include updating its 2008-2018 strategic plan with its most recent version finalized in the Fall of 2014, a strategic retreat, and the development of departmental strategic plans. Strategic goals strongly reflect education, health care, research, interprofessional education, and community engagement components of

WesternU/COMP's mission, among others. Moreover, the alignment of core competencies and mission has fostered an assessment system that identifies every learning activity in the curriculum and the core competencies derived therefrom. The linkage of core competencies and mission elements to learning activities enhances the strategic planning process by targeting multiple formative and summative assessments of these mission elements. This Standard is met. A Commendation is written.

#### Commendation:

WesternU/COMP is to be commended for its strategic planning process and its linkage to key mission elements including academic achievement and outcomes assessment, research, and distinctive osteopathic health care delivery.

# **Current Findings - Standard 1.3.1**

The WesternU/COMP Self-Study contained comprehensive grids linking learning objectives to assessment mechanisms. COMLEX-USA Level 1, 2 and 3 passage rates are monitored and presented on Western University's website in easy to comprehend graphical form. Data on residency placement, including specialty and geographic distribution, are also clearly presented. The COM has analyzed the trends of its student residency placement to assess the number of needed residency slots within its OPTI. AOA Board certification will be tracked through the AOA physician data base. This Standard is met.

## **Current Findings - Standard 1.4**

Expansion of research is a strategic goal of Western University and WesternU/COMP. The recent creation of Western's Graduate College of Biomedical Sciences is intended to create new biomedical researchers. Strategies augmenting funding and space have been developed and implemented. The number of manuscripts, abstracts and presentations is growing. New researchers with histories of extra-mural funding have been hired. This Standard is met.

## **Current Findings - Standard 1.5**

Both of WesternU/COMP's locations offer distinctive osteopathic health care. The Pomona campus has two clinics and has solicited proposals for additional clinical activity. Facilities on the Pomona campus provide family medicine, OMM, physical medicine and rehabilitation healthcare. The Western Diabetes Institute allows students from many of Western University's programs including Osteopathic Medicine, Optometry, Physician Assistant, and Nursing to interact in real life clinical settings. The Lebanon campus has integrated clinical service opportunities into the Samaritan Healthcare System. This Standard is met.

## **Current Findings - Standard 1.6**

WesternU/COMP's Self-Study described a dynamic process which involves year-long monitoring of clinical rotation availability. The goal of this process is to be 30% above capacity for core rotations. WesternU/COMP's association with OPTI-West Educational Consortium assures opportunities for COM students to interact with post-doctoral interns and residents.

OPTI-West has 19 hospital members and five community partners, with 67 approved GME programs and 846 positions. There are 208 first year residency positions available in the OPTI-West. This Standard is met.

#### Standard Two: GOVERNANCE, ADMINISTRATION, AND FINANCE

#### Introduction

Western University by-laws define the processes and responsibilities related to the operation of the Board of Trustees. The by-laws also define the core roles of the President, the Provost and COO, and the Chief Financial Officer/Treasurer. The importance of evaluating any potential "self-dealing transaction" is addressed in the Board by-laws. Responsibilities of the administration, academic officers and faculty are delineated in the Faculty Handbook. Conflict of interest, due process and non-discrimination policies are included in the Self-Study and are accessible through the University Policy Office website. The Chief Academic Officer has responsibility and authority for the fiscal management of WesternU/COMP. The COM has sufficient resources to carry out its mission as it routinely operates under budget. Research is highlighted in strategic planning and fiscal support for research is growing. The Self-Study appendices quantify research publications. Individually and collectively, WesternU/COMP's administrators demonstrate the competencies described in the glossary of the Standards. There were no Requirements or Recommendations written for *Standard Two: Governance*, *Administration, and Finance*.

## **Current Findings - Standard 2.1**

Western University has by-laws which have been periodically revised and which define the roles and powers of the Board of Trustees. The Board currently has thirteen members. The by-laws define the location of Western University, the number of trustees, terms of office, Board powers, vacancies, the Annual Meeting, officer and committees of the Board, officers of Western University (President, Provost and Chief Operating Officer, Chief Financial Officer/Treasurer), execution of instruments, deposits and funds, and by-law amendments. The Executive Compensation Committee: "shall not recommend any 'self-dealing transaction' unless it determines that the standards contained in California Corporation Code 5233 and/or any other applicable statutes have been satisfied." This Standard is met.

## **Current Findings - Standard 2.1.1**

The roles of the President, Provost, and Chief Financial Officer/Treasurer are described in the Western University by-Laws. These roles, and those of other executive officers, are described in the Faculty Handbook. The Handbook also describes faculty rights and responsibilities, employment policies and procedures, faculty participation in the governance of Western University, and policies and procedures for revision of the above mentioned sections. Faculty Handbook appendices include Constitution and By-Laws of the Academic Senate, Grievance Procedures, other Faculty Processes and Procedures, and Research Policies and Procedures. This Standard is met.

#### **Current Findings - Standard 2.1.2**

Every Western University trustee, administrator, faculty member, and employee must annually certify compliance with the Conflict of Interest Policy. Due process policies exist for faculty and staff. Western University has a Policy on Protection Against Retaliation for Whistle-Blowing or Engaging in Protected Activity. Its policy of non-discrimination and equal employment opportunity prohibits discrimination on the basis of gender, race, color, religion, national origin, handicap, or sexual orientation. The policy further prohibits discrimination against employees or applicants for employment on the basis of, age, ethnic origin, marital status, sexual orientation, disabled veterans, Vietnam era veterans, medical condition, citizenship, or any other basis protected by law. Western University policy prohibits acts of sexual harassment. Western University has a FERPA adherence policy and HIPAA policies easily accessible on the University website. A Confidentiality of Records policy is contained in the Employee Handbook. Western University has a fiscal accountability policy. This Standard is met.

#### **Current Findings - Standard 2.1.3**

WesternU/COMP's Self-Study contained evidence of its authorization to function by the Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities and the Oregon Higher Education Coordinating Commission Office of Degree Authorization. This Standard is met.

#### **Current Findings - Standard 2.2**

WesternU/COMP confers the Doctor of Osteopathic Medicine degree, as evidenced by the College Catalog and minutes of the Board of Trustees. This Standard is met.

## **Current Findings - Standard 2.3**

Western University's Consolidated Statement of Activities for 2014 shows revenues of \$174.9 million and expenditures of \$161.2 million with a \$13.7 million increase of net assets. WesternU/COMP's operating budget has grown from \$14.9 million in 2007 to \$35.3 million in 2013. The COM has continually operated below budget and completed fiscal year 2014 with a \$1.4 million operating surplus. This Standard is met.

## **Current Findings - Standard 2.4**

Western University's organization chart shows the WesternU/COMP Dean reports directly to the Provost. The Dean's job description shows that she is responsible for overseeing all academic functions of the COM, including its fiscal oversight. The Dean recommends to the Provost/COO allocation and utilization of fiscal resources. This Standard is met.

#### **Current Findings - Standard 2.5**

The WesternU/COMP Dean received the Doctor of Osteopathic Medicine degree and is Board certified by the AOA in Family Medicine/OMT. Previously, she has served as Interim Dean of the COM, Executive Assistant Dean of WesternU/COMP-Northwest, and Program Director, Family Practice Residency Program, Eastmoreland Hospital in Portland, Oregon. This Standard is met.

## **Current Findings - Standard 2.5.1**

The WesternU/COMP Dean is a graduate of WesternU/COMP, as verified by the University registrar. This Standard is met.

## **Current Findings - Standard 2.5.2**

The WesternU/COMP Dean is board certified by the AOA in Family Medicine/OMT, as documented by the American Osteopathic Information Association. This Standard is met.

## **Current Findings - Standard 2.5.3**

The WesternU/COMP Dean's job description indicates that 100% of her time is to be allocated to her administrative responsibilities. This Standard is met.

## **Current Findings - Standard 2.5.4**

The WesternU/COMP Dean is an award winning osteopathic physician with a history of successful practice, health policy advocacy, clinical education leadership, and COM administration. This experience has allowed her to develop the competencies needed to effectively lead the COM. During her tenure, WesternU/COMP's academic and fiscal strength have increased. As manifested in the Self-Study and in interviews, student satisfaction levels are high. These outcomes validate the Dean's ability to recruit and manage COM employees; assess the adequacy of curricular models and delivery systems; participate in the development of mission, vision, goals, budgets and strategic plans; and advocate for the resources necessary to operate and grow the COM. This Standard is met.

#### **Current Findings - Standard 2.6**

WesternU and WesternU/COMP have an experienced fiscal leadership team. The Western University Chief Financial Officer/Treasurer has degrees in business administration, accounting, and marketing. He has served Western University in various capacities over 25 years. The Senior Director of Operations for WesternU/COMP is a financial and operational advisor to the Dean who works closely with the COM to develop and implement its budget. He holds degrees in law and society and accountancy. His consultancies have related to financial planning, treasury management, and revenue model development. He has been part of the Western University community since 2007. This Standard is met.

## **Current Findings - Standard 2.6.1**

WesternU/COMP is not a single degree program institution. This Standard is not applicable.

## **Current Findings - Standard 2.7**

Review of Curriculum Vitae confirm that WesternU/COMP has an appropriately degreed, highly experienced, and long standing leadership team composed of the founding President of the University; Provost/COO; Chief Financial Officer/Treasurer; Dean; Vice-Dean; Associate Deans; Senior Advisor for Strategic Leadership and External Affairs; Director of Operations; COMP-Northwest; and Senior Director of Operations who collectively possess the experience and capability in higher and medical education to sustain and enhance the COM. This Standard is met.

#### **Current Findings - Standard 2.7.1**

WesternU/COMP is not a single degree program institution. This Standard is not applicable.

## **Current Findings -Standard 2.8**

Western University has a comprehensive non-discrimination policy which precludes discrimination on the basis of "gender, race, color, national origin, religion, handicap or sexual orientation." The policy forbids acts of sexual harassment. The policy precludes discrimination against employees or job applicants on the basis of age, ethnic origin, marital status, veteran's disability or Vietnam era veterans, medical conditions, or citizenship within the limits imposed by law. This Standard is met.

## Standard Three: FACILITIES, EQUIPMENT, AND RESOURCES

#### Introduction

WesternU/COMP operates an urban 25 acre campus located on Second Street in Pomona, CA. There are 10 buildings on the campus for a total of over 700,000 square feet of space. In 2010, the COM completed construction on the 178, 000 sq. ft. Health Education Center (HEC) which now houses faculty/staff/administrative offices, research labs, food service, lecture halls, and student breakout rooms. The COM currently operates an Osteopathic Family Medicine Medical Center on the Pomona campus in the Patient Care Center, as well as an off-campus site in Rancho Cucamonga, CA. WesternU/COMP sponsors multiple community outreach programs to reinforce its instruction and to serve the local community. The clinical education program is supported by an extensive network of core clinical training sites, a five COM OPTI-WEST consortium, two Osteopathic Postgraduate Training Institute (OPTI) affiliate members, five OPTI community partners, 19 training institutions and one inter professional partner.

WesternU/COMP operates an "Additional Location" in Lebanon, OR (WesternU/COMP-NW) which opened in the Spring of 2011 and operates in a 55,000 square foot facility constructed in partnership with Samaritan Health Services. The building is leased from Samaritan Health Services and includes 9,743 square feet of available research space. There are plans to occupy additional space in the future to pursue the strategic plan initiatives which may include additional colleges or centers. There are lectures halls and classrooms, administrative offices, recreational space, breakout/group study space and library space, and NMM/OMM lab space for teaching, with adequate tables to accommodate student learning. Additionally there are research labs and a vivarium to accommodate both basic science and clinical research.

WesternU/COMP-NW operates as an "Additional Location" to WesternU/COMP as defined by the COCA; therefore, it utilizes the same administration, faculty, and budgetary structure as the WesternU/COMP campus in Pomona, CA. Students are admitted directly to WesternU/COMP as their primary place of enrollment and students from the entire program can take classes at either campus location.

Research facility maintenance and enhancement have been included in Western University's strategic planning. Square footage at both locations has the capacity to grow the size of the research footprint. Research space is allocated on an institutional basis, but every WesternU/COMP faculty member with more than half time research responsibilities receives research space. A pressure balance issue in one of the laboratories is being addressed. The large number of published manuscripts, abstracts, and presentations is evidence of appropriate research facilities use. There were two Recommendations written for *Standard Three: Facilities, Equipment, and Resources*.

#### **Current Findings - Standard 3.1**

WesternU/COMP operates an urban 25 acre campus located on Second Street in Pomona, CA. In 2010, the COM completed construction on the 178, 000 sq. ft. Health Education Center (HEC) which houses faculty/staff/administrative offices, research labs, food service, lecture halls, and student breakout rooms. The COM currently operates an Osteopathic Family Medicine Medical Center on the Pomona campus in the Patient Care Center, as well as an off-campus site in Rancho Cucamonga, CA. WesternU/COMP also sponsors multiple community outreach programs to reinforce its instruction and to serve the local community. The clinical education program is supported by an extensive network of core clinical training sites, a five-COM OPTI-WEST consortium, two Osteopathic Postgraduate Training Institute (OPTI) affiliate members, five OPTI community partners, 19 training institutions, and one inter professional partner.

WesternU/COMP operates an "Additional Location" in Lebanon, OR (WesternU/COMP-NW) which opened in the Spring of 2011 and operates in a 55,000 square foot facility constructed in partnership with Samaritan Health Services. The building is leased from Samaritan Health Services and includes 9,743 square feet of available research space. There are plans to occupy additional space in the future to pursue the strategic plan initiatives which may

include additional colleges or centers. There are lectures halls and classrooms, administrative offices, recreational space, breakout/group study space and library space, and NMM/OMM lab space for teaching, with adequate tables to accommodate student learning. Additionally there are research labs and a vivarium to accommodate both basic science and clinical research.

WesternU/COMP-NW utilizes the same administration, faculty, and budgetary structure as the WesternU/COMP campus in Pomona, CA. Students are admitted directly to WesternU/COMP as their primary place of enrollment and students from the entire program can take classes at either campus location.

Any faculty member on either campus with more than half time allocation to research has her/his own dedicated research space. HVAC pressure balance issues have been an obstacle to the receipt of Animal Biosafety Laboratory level 3 certification. WesternU/COMP plans to engage outside consultants to address this issue. In general, research laboratories, clinical practice sites, COM teaching and simulation labs and library and counseling spaces enable the achievement of WesternU/COMP's mission. The COM has more than adequate facilities at each campus to fulfil its mission and objectives. This Standard is met.

## **Current Findings - Standard 3.1.1**

The Western University Space Planning Committee has a formal process for space planning which requires each college to annually submit short and long-term (one year and three year) space plan summaries. Feedback from the executive leadership team and student body prompted creation of a student learning resource center and expansion of the Clinical Skills and Simulation Labs in Pomona. Research space allocations for Western University are made by the Vice President for Research based on a hierarchy of externally funded projects, funded competitive intra-mural projects, as a recruitment tool for prospective faculty, and as available for pilot investigations and short term studies.

The WesternU/COMP Office of Operations is responsible for activities at both campus locations and serves as the primary mechanism for conducting and evaluating facility resources to achieve the mission and objectives of the WesternU/COMP. The COM, in conjunction with the Western University Facilities and Physical Plant, develops and submits biannual need projections to the Western University administration for consideration. Research space allocations are performed by the VP for Research utilizing a multifactorial approach to ensure the available Western University research space is maximized. The University Facilities and Physical Plant department ensures all physical assets are up to code and functioning properly. This Standard is met.

## **Current Findings - Standard 3.2**

The Harriet K and Philip Pumerantz Library has electronic resources accessible at both campuses and remote locations. The number of data base searches has increased each year. Study room reservations have increased and more study space is being planned. Lebanon

campus faculty, staff and students also have access to the Good Samaritan Medical Center Regional Library, Samaritan Albany General Hospital Library, and the Lebanon Public Library. COM students are required to have laptop computers to facilitate linkage to electronic resources, including Share Point and Blackboard. WesternU/COMP uses a lecture capture system and testing software. On-line tools are being integrated into clinical clerkship activities and learning outcomes assessment. In addition to the traditional facilities budget, a new university-wide budget process will allocate a pool of dollars annually to capital improvement.

The Harriet and Philip Pumerantz Library located on the Pomona campus has full electronic availability for both campus sites and other remote locations for students during their clinical rotations. Policies and procedures for online access are continually updated to facilitate the use of electronic resources from both campus locations. SharePoint and Blackboard are utilized as the mechanism to disseminate the curriculum, reference material, research data, and other student related information to both campuses. Echo360 system provides students on both campuses 24/7 access to all lectures. Online library resources e.g., UpToDate and other on line resources have increased in usage. Documents and references from the print collection are available to be scanned and delivered to individuals electronically free of charge for both campuses.

Outcomes from the Student-Driven Analysis and DO Graduating Student Survey are assessed and utilized to form action plans regarding learning resources. Computer support services at both campuses are most capable and the support for student lectures, student clubs, and faculty meetings to be conducted at both campuses concurrently is impressive and very functional.

WesternU/COMP provides adequate learning resources at both campuses, although technology remains somewhat challenging as shared learning via streaming and recordings still is prominent within the one-curriculum approach offered at two sites. It seems to be working, though, and the COM has adapted based upon assessment feedback from faculty and students to continually improve. Library resources also appear adequate. One issue mentioned by both students and faculty was the need for an enhanced microphone system in the large classrooms. Sharing of limited microphones with large classes impedes the instructional interaction. As such, students commented they no longer ask questions, except when absolutely necessary, because of the hassle involved and out of respect for classmates due to the awkward nature of passing microphones among the class. This Standard is met. A Recommendation is written.

#### **Current Findings - Standard 3.3**

All WesternU/COMP affiliated sites are evaluated annually by COM faculty and administrators. Included in site assessments are areas for student study, facilities for on call students, access to reference materials, access to internet, and site safety. Student evaluations of sites include learning resources, with low scoring sites identified for immediate attention. Town Hall meetings with students are used to gather additional information on learning resources. New technology based interventions, such as an embedded OMM experience, are evaluated with comparison of traditional and embedded instruction students on outcome measures including COMAT and OSCE examinations.

WesternU/COMP has identified necessary learning resources for the delivery of the curriculum relevant to affiliated teaching sites and monitors its clinical training sites to ensure that learning resources are in place to meet the mission and objectives of the COM. New core rotation sites are assessed for adequate learning resources prior to initiating student rotations. Assessments by students of the individual rotations are evaluated at the department Chair and Director of Clinical Education level.

All affiliated sites are evaluated by faculty and administrators through annual site visits as well as multiple visits by the Director of Clinical Education. Deficits in learning resources are identified and addressed during these site visits. Students complete online evaluations of all affiliated sites and specifically review learning resources. Low scores on evaluation of sites are identified through the New Innovations system and flagged for immediate attention. Evaluation data is compiled and analyzed annually for trends in performance at each site. A Town Hall for students on rotations is conducted during each didactic week and students are encouraged to give feedback regarding sites directly to administrators. These meetings appear to be fairly well attended by students.

WesternU/COMP does review learning resources at both campuses and affiliated sites. However, in discussions with stakeholders, it was apparent that assessment of learning resources at distant sites and both campuses, as well as instruction for students on the learning resources, would be enhanced by additional staff charged, in part, with this oversight. This Standard is met. A Recommendation is written.

#### Standard Four: FACULTY

#### Introduction

The faculty at both the WesternU/COMP Pomona, CA campus and COMP-Northwest are organized into departments, the Chairs of which report to the Vice Dean. These Departments include Clinical Sciences, Family Medicine, Internal Medicine, NMM/OMM, and Basic Medical Sciences (which includes Anatomy). The Chairs of these departments are Pomona-based, while the Vice-Chairs (which exist for the Family Medicine, NMM/OMM, Basic Medical Sciences, and Anatomy Departments) are based out of the Lebanon campus. Faculty adequacy across the OMS I and II curriculum is determined by a Faculty Adequacy Model. Upon hire, faculty credentials are verified, and once hired, faculty members are supported by a robust faculty development program. A COM-specific Faculty Assembly exists, and COM faculty also have representation (from both campuses) on the University Faculty Senate. There were two Commendations and one Recommendation written for Standard Four: Faculty.

#### **Current Findings - Standard 4.1**

WesternU/COMP has a faculty adequacy model that provides sufficient basic science and clinical faculty to fulfill the mission and goals of the COM. There is a mix of full-time, part-time, and volunteer faculty at both sites to demonstrate the ability to satisfy this requirement. The faculty members are required to sign a new contract yearly; the negotiation for changes in the percentage of time for clinical, teaching and research is discussed with the department Chair and decided by the academic dean.

There is a defined description of the difference between full time (>37.5 hours per week) versus part time. Adjunct/volunteer faculty definitions are described in the faculty handbook. There are five standing committees for the WesternU/COMP and appropriate representation of faculty to each of these committees. There are strict policies and procedures for the administration of the committees. Committees keep the Faculty Assembly informed regarding their outcomes and make proposals for discussion or action as appropriate. The committees annually assess the effectiveness of their work and report these outcomes to the Faculty Assembly.

Faculty members are assigned to give lectures at each site and the listing of courses and teachers are identified to students and faculty. Faculty vitae, contracts, and appointments are maintained in the Dean's office. The policies and procedures as well as the code of conduct are provided in the Faculty Handbook.

The faculty members support student organizations and there are numerous student-initiated and managed clubs on each campus. Many of the student organizations operate meetings on both campuses simultaneously by use of the streaming and video capability provided by the college. There are also separate clubs that operate individually only on one campus. Sufficient rooms are available with audio/video streaming capability at both campuses to allow both faculty and student meetings to occur simultaneously at both campuses.

WesternU/COMP has a central database of faculty, department, rank and FT/PT status, as defined in the Western University Employment Handbook. In addition, they maintain a comprehensive listing of lectures assigned and given to the DO students. Lectures are also commonly given to the DPM students, who sit in on many of the COM classes. WesternU/COMP has hired faculty with sufficient expertise in the areas in which they teach and serve the COM, as documented in the faculty CVs. Faculty Adequacy for the fulfillment of the mission and objectives of the COM is determined by comparison of available teaching hours on each campus with the number of hours required to deliver the entire curriculum. By this method of determination, the COM states that they have adequate faculty. However, on both the Pomona and Lebanon campuses, there was a sentiment expressed by several faculty, faculty leaders, and the administrative leadership that it would be beneficial to have more faculty, given the minimal buffer in faculty numbers, should someone fall ill or leave suddenly to take another position. A more precise faculty adequacy model would be beneficial in identifying areas of potential need across teaching, research, service, administration and clinical responsibilities (see also current findings under Standard 4.1.1). The faculty members are clearly dedicated and go above and beyond to meet the mission of the COM and to ensure student success. This Standard is met. A Commendation is written.

#### **Commendation:**

WesternU/COMP faculty members at both campuses are to be commended for their dedication and commitment to the institution and to their students.

#### **Current Findings - Standard 4.1.1**

WesternU/COMP has sufficient and appropriately trained faculty at each location. Each location has adequate faculty to deliver the curriculum and provide the necessary professional services to the students at each site with faculty resources for each site additionally augmented utilizing streaming and video conferencing technology. The faculty adequacy model identifies faculty teaching responsibilities by location and is listed in references provided.

Faculty include osteopathic and allopathic physicians, basic scientists (in Anatomy, Biochemistry, Physiology, Microbiology and Pharmacology) as well as other areas to include Public Health, Physician Assistant, and Nursing at both locations. The faulty members are cognizant of the COM's mission statement and seven core competencies and incorporate these ideals whenever appropriate in their course work. This is documented in the Faculty Adequacy Model Summary Dashboard, with percentage reported time spent teaching to each Core Competency.

Utilizing established curriculum tracking methods, augmented by novel curriculum mapping software, as well as annual reviews of contractual faculty agreements, the WesternU/COMP faculty adequacy model delineates faculty teaching capacity for the preclerkship curriculum at both sites. The model also identifies the total hours required for curriculum delivery. The faculty adequacy model does not specifically define by discipline/department the number of faculty available for teaching at each campus, although it does provide a general capability for teaching for each discipline. It appears that the courses can be delivered adequately by each discipline but arrangements need to outline the percentage of lectures provided by faculty from each campus. The faculty adequacy model also allows for delineation of time for teaching, scholarship, research, clinical practice, administration and other clinical practice that is non-university based.

The WesternU/COMP faculty adequacy model presents an aggregate number of faculty hours available for teaching, scholarship, Research Activities, Service, Administration, Clinical Practice and other duties by location. The Faculty Adequacy Model showed a significant surplus of teaching hours on the Pomona campus (17,388), but with a much narrower margin of surplus on the Lebanon campus (533). It appeared as though the faculty as a whole did not have a significant part in developing the faculty adequacy model.

On both the Pomona and Lebanon campuses, there was a sentiment expressed by several faculty, faculty leaders, and the administrative leadership that it would be beneficial to have more faculty, given the minimal buffer in faculty numbers, should someone fall ill or leave suddenly to take another position. In addition, based upon meetings with department and discipline leaders at both campuses, there did seem to be some confusion as to whether faculty positions that were recently, or soon to be vacated, were to be filled. This seemed to reflect a potential weakness in the aggregate way in which the faculty adequacy model is created, in that although overall faculty adequacy is demonstrated, specific faculty needs in any one discipline may potentially be over-looked. This Standard is met. A Recommendation is written.

#### **Current Findings - Standard 4.1.2**

Review of available WesternU/COMP documents, and interviews with faculty and administration, confirmed the COM academically credentials its faculty on-site and at affiliated sites. The process of verifying academic and professional credentials is carried out by the Department Chairperson as informed by the comprehensive "Checklist for New Faculty Appointment Packets." Documentation of credentials is compiled by the Chair and provided to the Department of Human Resources. The Chairs consider these credentials in formulating a recommendation which they provide in writing to the Dean who forwards her final recommendation to the Provost. All faculty applicants complete a Faculty Appointment Packet. The Department of Clinical Education maintains a database containing the credentials of all faculty members who teach in the clinical curriculum. This collection is site-specific to either campus location but the processing of the data is centralized on the Pomona campus. A credentialing specialist maintains an Excel spreadsheet with a list of the entire faculty. The Department of Clinical Education also maintains a database containing the credentials of all adjunct clinical faculty members who teach in the clinical curriculum. There is a policy of a five year appointment to each affiliated and educational teaching site faculty member. This Standard is met.

## **Current Findings - Standard 4.2**

After review of provided credentials and after interviews, it was determined all WesternU/COMP Biomedical Science and related Chairs have appropriate experience for the positions they hold. All of the clinical department Chairs have had prior academic experience in teaching students at various stages of their previous careers. They have also had leadership roles in the academic institution before assuming the roles of Chair of their respective departments. This prior experience has prepared the new Chairs to lead their respective clinical departments. Curriculum vitae attest to this experience. This Standard is met.

## **Current Findings - Standard 4.2.1**

The WesternU/COMP Department Chairs for both Family Medicine and Internal Medicine are AOA board-certified osteopathic physicians. This Standard is met.

## **Current Findings - Standard 4.2.2**

The WesternU/COMP Department Chair for Osteopathic Manipulative Medicine/Neuromusculoskeletal Medicine at the College is board-certified. This Standard is met.

## **Current Findings - Standard 4.2.3**

All WesternU/COMP Department Chairs for clinical specialties are board-certified. The COM has a group of specialized physicians serving as clinical Chairs in each of the following departments: OB/GYN, Surgery, Pathology, Pediatrics and Psychiatry. Each Department Chair is currently board-certified. This Standard is met.

#### **Current Findings - Standard 4.2.4**

All Department Chairs actively recruit, manage and evaluate their faculty and non-faculty staff. They have all demonstrated the expertise to evaluate curriculum models and delivery modalities. All chairs are expected to define the financial, fiscal and human resources needed for their departments. Each year the Department Chairs evaluate the teaching capabilities of their faculty and recommend improvements or changes. The Chairs actively participate in the design, delivery, assessment, and outcome analysis for their assigned curricula. Each Chair serves as an ex-officio member of the Curriculum Committee to ensure that their specialty is integrated throughout the pre clerkship and clerkship curricula. This Standard is met.

#### **Current Findings - Standard 4.3**

WesternU/COMP enforces a policy of non-discrimination with regards to selection of faculty, administration, and support staff. This is defined in the Western University Faculty Handbook. It is the policy of Western University to provide equal employment to all employees and applicants for employment as required by law without regard to age, race, religion, sex, national origin, marital status, disability, mental or physical handicap, sexual orientation, gender identity, or any other basis protected by law. This Standard is met.

## **Current Findings - Standard 4.4**

There are multiple offices that provide faculty development, including The Center for Academic and Professional Enhancement (CAPE), the Institute for Medical Educators (IME), and the Office of Human Resources (HR). CAPE provides continuous faculty development programs throughout the year for all WesternU administration, faculty, and staff.

The University Faculty Development Committee, which has representation from each of the nine Western University colleges, regularly meets to ensure the curriculum covers topics in Teaching, Research, Service, and Scholarship. Electronic resources are readily available to all faculty members, including adjunct faculty, via the CAPE website. The IME mission is to actively promote the knowledge, skills, and resources necessary to encourage the optimal performance of all faculty members. All IME events are recorded and posted to the IME website, along with any handouts that were provided during the session so that materials can be assessed at any time. The IME hosts a week-long event known as "Professional Development Week" which is geared toward both faculty and staff.

An Academic Boot Camp and a New Faculty Orientation are required trainings for any new employee, including a workshop on "Osteopathic Principles and Practice for Faculty. Each year, all faculty members are required to attend the "Faculty Advisor Training" session. Finally, outcomes from an annual Faculty Development Needs Assessment and program evaluations are utilized to drive program development. WesternU/COM offers a wide variety of faculty development programs which are also available to volunteer clinical preceptors. These multiple programs vary from the required Boot Camp and Orientation programs to on-going programs developed by several separate offices of the COM. The Center for Academic and Professional

Enhancement (CAPE), the Institute for Medical Educators (IME), and the Office of Human Resources (HR) offer a range of programs to promote and enhance the skills of faculty for teaching, research, scholarship and service. A video program is also available to MD volunteer faculty for education regarding the purpose and appropriate use of OMM. This Standard is met. A Commendation is written.

#### **Commendation:**

WesternU/COMP is to be commended for the large number of faculty development programs that it provides to all of its faculty.

## **Current Findings - Standard 4.4.1**

As part of the WesternU/COMP New Faculty Orientation, attendance at an "Osteopathic Principles and Practice (OP&P) for Faculty" workshop is required. Education about Osteopathic Medicine/OP&P for Faculty is also provided on the Institute for Medical Educators (IME) website for both clinical and non-clinical faculty whether on or off campus. The faculty development program provides both knowledge and understanding of osteopathic philosophy and principles. The COM's OMM Department is experienced, and they share this experience through faculty development which extends into the affiliated sites as well as on-campus. This Standard is met.

#### **Current Findings - Standard 4.5**

WesternU/COMP department meetings enable faculty members to discuss concerns, share scientific ideas and announce avenues for collaboration for teaching and research. The COM has a Faculty Assembly, with representation from this group on the Western University Faculty Senate. Meetings with faculty, and review of Faculty Assembly minutes, confirm this is an adequate forum for free exchange of ideas and addressing the needs and concerns of faculty, formulate positions on key issues representing faculty consensus, and make decisions within its delegated scope of authority. This Standard is met.

## **Current Findings - Standard 4.6**

Western University has a set of policies and procedures addressing faculty recruitment, promotion, appointments, re-appointment, tenure, academic assignments and responsibilities, sabbaticals, reporting relationships, grievance, conflicts of interest, and benefits. WesternU/COMP has an appropriate Faculty Handbook and an Employee Handbook delineating policies and procedures relevant to faculty. The faculty policies and procedures address faculty recruitment, promotion, appointments, re-appointments, tenure, academic assignments and responsibilities, sabbaticals, reporting relationships, grievance, conflicts of interest, and benefits. This Standard is met.

## **Current Findings - Standard 4.7**

The Employee Handbook contains the WesternU/COMP's Professional Code of Conduct. Western University has adopted a formal "Professional Code of Conduct". The COM has formal policies and procedures found in its Employee Handbook, the Western University Faculty Handbook, the COM Faculty Handbook, and the College Catalog. This Standard is met.

## **Current Findings - Standard 4.7.1**

WesternU/COMP has adopted the AOA Code of Ethics. This Standard is met.

#### **Standard Five: STUDENTS**

#### Introduction

WesternU/COMP is committed to its students and their success. Students report that the administration is responsive to their feedback, quickly addressing any concerns, and often implements their ideas whether it is related to facilities, curriculum, or student services. The Dean holds regular open office hours for all students and student leaders on both campuses meet with the Dean weekly. Faculty are responsive both through email and in-person meetings and students are assigned a faculty mentor upon matriculation. Students report that the Assistant Dean of Student Affairs and Director of Student Affairs are highly responsive advocates for them.

Evidence of this commitment is also seen through the Student in Greatest Need (SIGN) task force, which consists of representatives from both pre-clinical and clinical faculty, the Office of Student Services, and the Learning Enhancement and Academic Development Office (LEAD). The purpose of this task force is to identify students who are at risk and refer them for early intervention. Students with poor performance on examinations are referred for appropriate counseling and resources through LEAD. The LEAD office offers academic counseling, advice on time management, test-taking strategies, and stress management. Tutoring is available for all COM students.

Over the past 18 months an Office of Career and Professional Development was created on each campus. These offices help prepare students for board exams, selecting and planning for specialty choice, and preparing for residency interviews. The Office also provides academic counseling and resources as applicable for these services. The goal is to best prepare students for successful completion of the program and transition to residency in order to meet WesternU/COMP's mission and objectives.

WesternU/COMP has an appropriate recruitment plan and admissions procedures to meet its mission and objectives. In addition to the standard measures of GPA, MCAT scores, and inperson interview, the COM has incorporated the Multiple Mini Interview (MMI) which measures a candidate's empathy, maturity, cultural sensitivity, teamwork, and communication skills.

WesternU/COMP students are very aware of the confidential behavioral health care services available to them, both on and off campus. Physical health care is available to students in Pomona through the Patient Care Center on campus and in Lebanon through Samaritan Health Services and the Samaritan Urgent Care Center. Students on both campuses report housing is available nearby. There were no Requirements or Recommendations written for *Standard Five: Students*.

#### **Current Findings - Standard 5.1**

WesternU/COMP has developed detailed admissions policies and procedures to meet its mission and objectives. These policies are provided in its College Catalog and on the prospective student website. All policies and procedures were confirmed by the Executive Director and the Assistant Director of Admissions, as well as, the Admissions Committees on each campus. The WesternU/COMP uses multiple rating scales to standardize the assessment of applicants in order to meet its mission, evaluating GPA, MCAT, and interview scores. In addition, all applicants must participate in the Multiple Mini Interview (MMI) process which is conducted in the Patient Care Center with standardized patients in Pomona and the Clinic Skills Lab in Lebanon to measure a candidate's empathy, maturity, cultural sensitivity, teamwork skills, and communication skills. This Standard is met.

## **Current Findings - Standard 5.1.1**

Review of data published on WesternU/COMP's Institutional Research and Effectiveness website, showed that COM students are performing at, or above the national average on COMLEX-USA exams and nearly all students are placed into residency each year. Review of performance and outcomes is conducted by the Admissions Committee to consider changes to admissions policies, procedures, and criteria for future incoming classes in order to ensure continued alignment with COM goals and mission. Members of the Student Performance Committee and the Curriculum Committee also serve on the Admissions Committee, and have opportunity to provide feedback to the Admissions Committee for future consideration of changes to policies, procedures, or criteria for admission.

Over the past 18 months an Office of Career and Professional Development was created on each campus. These offices help prepare students for board exams, selecting and planning for specialty choice, and preparing for residency interviews. The Office also provides academic counseling and resources as applicable for these services. The goal is to best prepare students for successful completion of the program and transition to residency in order to meet WesternU/COMP's mission and objectives. This Standard is met.

#### **Current Findings - Standard 5.2**

WesternU/COMP has an enrollment plan that includes lead generating strategies and recruitment events. Strategies include college presentations to undergrad student groups and prehealth advisors, attendance at grad school fairs, pre-health student conferences, attending health care providers' conferences and presentations, and relationships with feeder schools.

WesternU/COMP and WesternU/COMP-NW also host on-campus information sessions and tours for prospective students. According to the Executive Director of Admissions, between the two campuses, there were close to 10,000 applications in the last recruiting season and about 80% of those applicants were invited to submit a secondary application.

WesternU/COMP and WesternU/COMP-NW also have linkage programs, including the Masters of Medical Science degree program at Western University. The COM reserves ten spots for capable students interested in gaining admissions, and typically admits 10 to 15 students per year from the linkage programs. This Standard is met.

## **Current Findings - Standard 5.3**

The WesternU/COMP College Catalog and prospective student webpage state that applicants must have a minimum of 90 semester hours leading towards a baccalaureate degree completed in order to apply to the COM. This was also confirmed in interviews. This Standard is met.

## **Current Findings - Standard 5.3.1**

WesternU/COMP has a process in place to verify candidates with credentials from a college or university outside the US have met the equivalency of the minimum requirements for admission. Review of a sample file with one semester of international coursework confirms this process is followed. This Standard is met.

## **Current Findings - Standard 5.3.2**

WesternU/COMP has a non-discrimination policy in the online College Catalog under *Admissions Policies and Procedures* as well on the prospective student webpage. Interviews with Executive Director and Assistant Director of Admissions also confirm compliance. This Standard is met.

## **Current Findings - Standard 5.4**

WesternU/COMP and WesternU/COMP-NW have transfer credit and waiver policies and procedures in place, as confirmed through the College Catalog documentation and via interviews. The COM requires transferring students to apply through AACOMAS, provide letters of recommendation, and proof of good standing at the sending COM. Each transfer student must go through the same application process as any other incoming student. The application and review process was confirmed through interviews with the Director of Admissions, Assistant Director of Admissions, and the entire Admissions Committee. Transfers are rare at WesternU/COMP and there have been none so far to WesternU/COMP-NW. The file was reviewed of one recent transfer into WesternU/COMP from another COM in June 2014 and all documents were in order. The Admissions Committees are aware of the transfer process and their roles are the same as with traditional applicants. This Standard is met.

#### **Current Findings - Standard 5.4.1**

The WesternU/COMP College Catalog, the prospective student website, and interviews with the Executive Director of Admissions and Assistant Director of Admissions confirm that credits may only be transferred from COCA or LCME accredited colleges or universities. This Standard is met.

## **Current Findings - Standard 5.4.2**

The WesternU/COMP College Catalog, the prospective student website, and interviews with the Executive Director of Admissions and Assistant Director of Admissions confirm that when a student transfers from another COM, the last two years of instruction must be completed at WesternU/COMP or WesternU/COMP-NW. This Standard is met.

#### **Current Findings - Standard 5.4.3**

The WesternU/COMP College Catalog, the prospective student website, and interviews with the Executive Director of Admissions and Assistant Director of Admissions confirm that when a student transfers from an LCME accredited medical school or college, the last two years of instruction must be completed at WesternU/COMP or WesternU/COMP-NW. This Standard is met.

## **Current Findings - Standard 5.4.4**

The WesternU/COMP College Catalog, the prospective student website, and interviews with the Executive Director of Admissions and Assistant Director of Admissions confirm that when a student transfers from an LCME accredited college or university, the last two years of instruction must be completed at WesternU/COMP or WesternU/COMP-NW. This Standard is met.

## **Current Findings - Standard 5.4.5**

As noted in the WesternU/COMP Self-Study, the COM policy indicated that it does not transfer courses from student's prior medical school. Therefore, the policy does not include credit criteria or transfer articulation agreements. A notation is simply made on the student's transcript indicating from which medical school he or she transferred. A brief update to the Self-Study was provided that indicated that effective July 1, 2015 the COM will transfer course credits from another institution and indicate those transfer credits on the transcript. This upcoming change was confirmed with the University Registrar. This Standard is met.

#### **Current Findings - Standard 5.4.6**

As noted in the WesternU/COMP Self-Study, the COM policy indicated that it does not transfer courses from student's prior medical school. Therefore, the policy does not include credit criteria or transfer articulation agreements. A notation is simply made on the student's

transcript indicating from which medical school he or she transferred. A brief update to the Self-Study was provided that indicated that effective July 1, 2015 the COM will transfer course credits from another institution and indicate those transfer credits on the transcript. This upcoming change was confirmed with the University Registrar. This Standard is met.

## **Current Findings - Standard 5.4.7**

The institutional accreditor for Western University is the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges (WASC). Since COCA is not the institutional accreditor for the COM, this Standard is not applicable.

## **Current Findings - Standard 5.5**

WesternU/COMP students on both campuses report that regular access to administrators is available. The Dean and/or Vice Dean host monthly town hall meetings and invite all students. The Dean also holds open office hours bi-weekly. Each COM student is assigned a faculty mentor and students report faculty are responsive to their requests via email, and are open to in-person meetings. They report that there is strong support from the Assistant Dean of Student Affairs, Pomona, who oversees their Student Government Association (SGA), and is a true advocate for student needs. The Assistant Dean in Pomona, who is exclusively dedicated to the COM, also handles all of their general student concerns in a timely, professional, confidential manner. Students also reported the same strong support and dedication from the Director of Student Affairs in Lebanon.

The Office of Financial Aid reported that students have online access to their student loan indebtedness at any time and students confirmed this to be the case. The Director of Financial Aid reports the Western University provides the SALT program, an online debt management program, to all students, and they are encouraged to sign up for this program at matriculation. The financial aid counselor in Lebanon was particularly highlighted by students for the excellent personalized service she provides to them.

WesternU/COMP has a department called Learning Enhancement and Academic Development (LEAD) which offers academic counseling, advice on time management, test-taking strategies, and stress management. The Director of LEAD is an ex-officio member of the Student Performance Committee (SPC). LEAD services are available to all students, but regular meetings with LEAD are required for students who are experiencing academic difficulties. These requirements are provided to the student by the SPC. Tutoring services, provided by other students, are also available and are coordinated through the LEAD office. This Standard is met.

#### **Current Findings - Standard 5.5.1**

Confidential physical health care services are available to WesternU/COMP students. Information about these services is posted on the COM website and students confirmed their awareness of the services. In Pomona students have access to the on campus Patient Care Center (PCC) and to area medical centers off campus. Students reported that the administration has

worked with the PCC to address their concerns about length of time it takes to secure an appointment and that they can now get same or next day appointments. In Lebanon students have access to Samaritan Health Services and Samaritan Urgent Care, as well as clinics and physicians in Lebanon and Corvallis. This Standard is met.

## **Current Findings - Standard 5.5.2**

WesternU/COMP has a counseling services website with information for its students on how to confidentially access behavioral health care services through an EAP via OptumHealth. In the Student-Driven Analysis, 96.61% of students reported the awareness of these behavioral health care services. Interviews with students confirmed their knowledge of these services and how to secure them. Additionally, the COM has an onsite behavioral health care specialist located in a private area near the LEAD office that students can access confidentially. WesternU/COMP-NW has a counselor who has off-site appointment availability just across the street from the COM building. This Standard is met.

## **Current Findings - Standard 5.6**

According to the Western University Registrar, student files are completely paperless. The Registrar oversees electronic access to student records, with IT granting access as approved by the Registrar. The Registrar also oversees annual FERPA training for Western University. Training is provided online and those who do not comply with the training requirements have their access to the Western University systems revoked. This Standard is met.

# **Current Findings - Standard 5.7**

WesternU/COMP maintains an online College Catalog which is updated on an annual basis, and throughout the year as needed. College Catalogs from the various programs are maintained by the Western University Registrar. If any changes are made throughout the year, students are notified via email and the appropriate edits are made to the online catalog. Each Catalog contains information on standards of academic progress, evaluation and grading, attendance, tuition and fees, refund policy, student promotion and graduation, students' rights and responsibilities, and academic freedom. Issue/dispute resolution procedures and appeal procedures are also included. This Standard is met.

## **Current Findings - Standard 5.8**

The online WesternU/COMP College Catalog details the procedure for complaints regarding accreditation standards under *Issue/Dispute Resolution*. The address, email, and phone number for the COCA in the AOA Office of Predoctoral Education are listed in the Catalog. The recording of student complaints against the COCA accreditation standards is the responsibility of the Assistant Dean of Student Affairs in Pomona and the Director of Student Services in Lebanon. A review of the records indicates that 1 complaint was filed since the last comprehensive site visit that occurred in Jan 30-Feb 1, 2008. The complaint addressed Standard 6.8.1. The resolution was that COCA reviewed and subsequently dismissed the complaint and found WesternU/COMP in compliance with the standard. This Standard is met.

## **Standard Six: CURRICULUM**

#### Introduction

The Western U/COMP curriculum is a fairly traditional systems-based curriculum with some unique aspects. Small and large group sessions take place, along with appropriate laboratory session and SIM medicine experiences. There is a "one curriculum" approach such that students at both campuses receive the same educational program. The curriculum meets the mission of the COM. OPP is integrated appropriately throughout all four years of the curriculum, and there is a comprehensive assessment approach utilizing many variables such as COMLEX-USA data, GPA, and other parameters. Use of the Academic Progress Portal (APP) is quite valuable to the demonstrated success of both assessment and curricular mapping. The APP also is an important tool for faculty and students as the class moves through the curriculum. Eventually the APP will be used to explore pre-matriculation trends associated with academic performance measures.

Clinical education at WesternU/COMP is delivered primarily in community-based hospitals with only a few team based programs. All students must take at least one team based training experience before graduation. The 3<sup>rd</sup> Year clinical rotations are the "core" standards with four weeks of OMM and eight weeks of electives. The 4<sup>th</sup> Year is committed to four weeks of ER rotation, two weeks of sub-I IM and two weeks of sub-I-surgery rotations. Site availability is adequate for all the core rotations.

WesternU/COMP is committed to OPP and OMM in all four years of its curriculum. The Academic Progress Portal tracks the grades and performance of COM students and also acts as a warning for potential insufficiencies. Student evaluations continue throughout the four-year process with multiple modalities of testing including Didactic week, OSCE, standardized patients, COMLEX-USA exams, rotation evaluations, written evaluations and OMM practical. Results of the Student-Driven Analysis were provided and serve as a respected feedback tool for curriculum and rotation site evaluations. There were two Commendations and one Recommendation written for *Standard Six: Curriculum*.

## **General Requirements**

#### **Current Findings - Standard 6.1**

WesternU/COMP has a curriculum which is appropriate to meet its mission and goals. The curriculum includes the following areas of biomedical sciences and disciplines related to Osteopathic Medicine as delineated in this Standard: principles, history and practice of osteopathic medicine, human anatomy, biochemistry, pharmacology, genetics, physiology, pathology, microbiology, physical and differential diagnosis, medical ethics and legal aspects of medicine; internal medicine, family medicine, pediatrics, geriatrics, obstetrics and gynecology, preventive medicine and public health, psychiatry, surgery, radiology, and basic knowledge of the components of research.

The 3<sup>rd</sup> Year clinical curriculum includes four-week rotations in each of the seven disciplines, including twelve weeks in IM, eight weeks of electives and a four-week rotation in Essentials in Clinical Medicine (ECM). The 4<sup>th</sup> Year includes four weeks in the ER, as well as two rotations in sub-internships in IM and Surgery. The 4<sup>th</sup> Year includes seven weeks of electives plus one week of vacation. Opportunities exist to take online extra ECM courses throughout the 4<sup>th</sup> Year. These courses are congruent with the 7 AOA Core Competencies and promote the COM's mission. This Standard is met.

#### **Current Findings - Standard 6.1.1**

The WesternU/COMP academic curriculum is 167 weeks over four years. This Standard is met.

#### **Current Findings - Standard 6.2**

The WesternU/COMP Curriculum Committee is a diverse, all inclusive body with representatives from both campuses and includes both student and administrative leaders. The Committee utilizes Course Directors and Vice Directors to process student performance and evaluations from each clinical site. Information is processed via "SharePoint" and ultimately through a 360 degree feedback system. The Student Driven Analysis provided to the COM administration was also reviewed by the team and it is clearly a valuable tool for curricular feedback and course improvement. The results of the curricular assessment process are, for the most part, successful as confirmed by the faculty and the students. All four years of the curriculum are reviewed on a regular basis. This Standard is met. A Commendation is written.

#### **Commendation:**

WesternU/COMP is to be commended for its encouragement, support, and response to the Student Driven Analysis. The institutions of the changes based upon the results have greatly enhanced the student experience on both campuses.

# **Current Findings - Standard 6.3**

In the 3<sup>rd</sup> Year at WesternU/COMP, OMM is required in a four-week course integrated into the yearlong curriculum. OMM is offered as an elective in the 4<sup>th</sup> Year. There is also an ECM (online) training course available. These modalities are in addition to preceptor input at each rotation. This Standard is met.

#### **Current Findings - Standard 6.4**

WesternU/COMP is in an extraordinary position to develop and provide training and experience in interprofessional education (IPE). Western University has graduate schools in Nursing, Podiatry, Dentistry, Allied Health Professionals, OT, PT, Pharmacy and Optometry. The COM has developed a Phase 1 and Phase 2 required IPE curriculum for preclinical years and is in process of developing Phase 3 for clinical IPE. Phases 1 and 2 have already been reviewed and evaluated with ongoing improvements in progress. As a result of feedback in the Student

Driven Analysis, WesternU/COMP has developed a pilot program called "Longitudinal Chronic Care" where students follow a chronic care patient throughout their four years of professional training. It is a "patient centered medical home" which will prepare the students for future comprehensive interactive care. This Standard is met. A Commendation is written.

#### **Commendation:**

WesternU/COMP is to be commended for developing an extensive interactive, four-year interprofessional education program which will prepare its students for future comprehensive interactive care throughout their careers.

## **Core Competencies**

#### **Current Findings - Standard 6.5**

WesternU/COMP clearly stipulates specific educational objectives for its educational program, primarily through its syllabi. The COM has made progress in curricular mapping, and "tags" learning objectives with AOA Core Competencies, areas emphasized by the NBOME and exam questions from their curriculum and COMLEX-USA performance. As COMSAE becomes a gatekeeper exam, these results will also be incorporated into the assessment protocol. Students expressed satisfaction. Curriculum and core educational objectives are instituted using Institutional Learning Objectives (ILO) as a mirror of the AOA/AACOM Program Learning Outcomes (PLO). These objectives are correlated with the core competencies and the mission of the COM. The SharePoint curriculum map is used for overall "tagging" of learning activities. Clinical core training is provided for each discipline by the Clinical Chair for each rotation. This Standard is met.

## **Current Findings - Standard 6.5.1**

At WesternU/COMP, competency is tracked with COMLEX-USA passing rates, passage of end of rotation exams, preceptor evaluations, OSCE, COMAT, CPE, IPE courses, and preceptor evaluations. This Standard is met.

## **Current Findings - Standard 6.6**

The WesternU/COMP Academic Progress Portal is a comprehensive web-based database used to follow each student's academic and core competency proficiencies. The College Catalog was reviewed to document required outcomes leading to the DO degree. Expectations for COMLEX-USA passage are also well documented. This Standard is met.

#### **Current Findings - Standard 6.6.1**

Western U/COMP addresses 7 AOA Core Competencies individually. OMM/OPP is provided all four years, including end-of-rotation exams, Didactic Week, OSCE, COMAT, and standardized patient exams. The other core competencies are addressed with preceptor

evaluations, COMSAE and COMLEX-USA passage. The IPE course evaluates communication and humanistic skills as well as practice and systems based competency. Professionalism is an ongoing monitor throughout the entire curriculum. This Standard is met.

#### **Current Findings - Standard 6.7**

WesternU/COMP has the *COMP Placement Report*, Alumni Associate Database and the OPTI-West databank to follow its graduates through GME. The WesternU/COMP-NW campus has not yet graduated a class, but the same methodology is anticipated to be used at that campus. Data is tabulated, charted and used to review Match success of the COM. The Alumni office takes responsibility for tracking and updating graduates' development. This Standard is met.

## **Current Findings - Standard 6.8**

The WesternU/COMP Academic Progress Portal is used to assure delivery of the COM mission. Results of all those key assessments are maintained on this site including the listed in the Findings under Standard 6.6.1. This information is utilized to monitor student progress and to brief advisors when any competency require attention. This Standard is met.

## **Current Findings - Standard 6.8.1**

WesternU/COMP requires the passing of all COMLEX-USA exams at appropriate stages of training. This Standard is met.

## **Current Findings - Standard 6.8.2**

The results of the student assessments for COMLEX-USA are tracked and have been included in the WesternU/COMP Self-Study. COM student pass rates are consistently above the national average. This Standard is met.

## **Current Findings - Standard 6.8.3**

COMLEX-USA scores are detailed on the WesternU/COMP Academic Outcomes website. A COMLEX Task Force reviews results and advises the Associate Dean for Academic Affairs, the Executive Leadership Team, the Faculty Assembly, the Dean, and the Curriculum Committee for the appropriate follow-up and modification of the curriculum as needed. This Standard is met.

COMLEX-USA LEVEL 1 (a)		
Year (by academic year ending)	NATIONAL % PASS RATE	COM % PASS RATE
2010	90	94
2011	88	92
2012	92	95
2013	91	93
2014	92	93

COMLEX-USA LEVEL 2 CE (b)		
Year (by academic year ending)	NATIONAL % PASS RATE	COM % PASS RATE
2010	83	88
2011	86	91
2012	87	89
2013	89	92
2014	92	97

COMLEX-USA LEVEL 2 PE (c)		
Year (by academic year ending)	NATIONAL % PASS RATE	COM % PASS RATE
2010	95	99
2011	96	99
2012	95	98
2013	94	99
2014	93	96

COMLEX-USA LEVEL 3 (d)		
Year (by academic year ending)	NATIONAL % PASS RATE	COM % PASS RATE
2010	92	92
2011	91	92
2012	95	95
2013	95	97
2014	96	98

# **Clerkship Training**

# **Current Findings - Standard 6.9**

WesternU/COMP Affiliation Agreements were reviewed and are up to date and appropriate for all listed sites. This Standard is met.

#### **Current Findings - Standard 6.9.1**

Interviews with the WesternU/COMP Clinical Deans confirmed that there are at least one annual site visit and evaluations for all COM affiliated sites. Data from student evaluations is compiled to confirm re-appointment, faculty development or discharge from the program. All sites interviewed and visited had credentialed teaching faculty. Adequacy of affiliation is determined by the Department of Clinical Education, the Office of the Provost and the Office of Academic affairs. This Standard is met.

#### **Current Findings - Standard 6.9.2**

Each WesternU/COMP affiliated clinical site is surveyed annually to assess the number and type of slots available for the next year. This information is entered into a lottery system for each campus. Match with the top three choices was 100% for Lebanon and 86% for Pomona for the class of 2017. The COM continues to expand clinical training sites for both campuses. This Standard is met.

#### **Current Findings - Standard 6.10**

The WesternU/COMP clinical clerkship curriculum is driven by the 7 AOA Core Competencies and is delivered via the Essentials of Clinical Medicine course, the Clinical Rotation Syllabi, the ILO and PLO, the Didactic Week, and the clinical rotation sites. They all provide a symphony of educational cooperation to meet the COM's mission and objectives. This Standard is met.

#### **Current Findings - Standard 6.10.1**

WesternU/COMP is the founding member of OPTI-West Educational Consortium which is very active with 18 affiliated institutions. They all participate in the pre-doctoral clinical education system and provide 67 GME programs. This Standard is met.

#### **Current Findings - Standard 6.11**

The WesternU/COMP teaching faculty members at all core rotation sites have faculty appointments at the COM. The appointment process for full-time employed faculty is slightly different than that for adjunct faculty. However, all faculty members have a recommendation from the Chair, review of CV, and a verification of credentials. Appointment packets are reviewed by the Department Chair, Vice Dean and Provost. Criminal background checks are not conducted on adjunct clinical faculty, though they are done for employed clinical faculty. Adjunct faculty members are re-credentialed every 5 years. This Standard is met.

#### **Current Findings - Standard 6.12**

WesternU/COMP adjunct faculty members at clinical sites receive regular faculty development from the COM on teaching methods and OMM/OPP. They receive clerkship specific information on goals, objectives, and expectations from the Clerkship Director, detailed

information on overall expectations of students and what they can and cannot do on rotations, as well as school policies from COM administration. One clinical preceptor serves on the Curriculum Committee. There were examples provided where clinical preceptors at a site made suggestions for changes in the curriculum which were adopted and resulted in improved preparation for clinical rotations. This Standard is met.

#### **Current Findings - Standard 6.13**

WesternU/COMP students are assessed in each clerkship via a clinical evaluation completed by the preceptor, as well as an OSCE and/or COMAT in many of the clerkships. Student performance is tracked using the Academic Performance Portal (APP). Low performance flags are reviewed by students' advisors and administrators. The COM is implementing a new LMS platform called RealizeIt to provide for the retention of information across the clinical curriculum. This was used first for the Western University College of Dentistry. It showed good outcomes and therefore it will now be utilized by the COM. This Standard is met.

#### **Current Findings - Standard 6.14**

WesternU/COMP evaluates all of its clinical sites in several ways. Students complete an end-of-rotation evaluation about their experience. These are tracked by the assessment team for outliers. Low performance flags are sent to the appropriate clinical Chair, Clerkship Director, and the Director of Clinical Education who all coordinate the best way to deal any issues with a preceptor and follow that to resolution by improvement or elimination of site. Also administrators from WesternU/COMP conduct annual site visits where they can evaluate the facilities and the teachers. A review of student performance on evaluations, OSCEs, COMATs, and discipline specific COMLEX-USA performance is conducted by site. All learning objectives are linked to the COM mission and competencies.

Examples of student evaluations while on clinical rotations were provided to the team. The COM is now beginning to conduct on-site evaluations. Although no comprehensive clinical clerkship evaluations were provided. The COM indicated that these evaluations were going to be conducted by the new assessment office. The COM recently began requiring students to keep electronic logs on the New Innovations website and will be looking at comparability of student experiences, patients, procedures, and volume at the various sites. This Standard is met. A Recommendation is written.

#### **Standard Seven: RESEARCH AND SCHOLARLY ACTIVITIES**

#### Introduction

As part of Western University, WesternU/COMP has had a steadily growing research infrastructure supported by both internal and external funds. There is a COM-specific Research Strategic Plan which complements the Western University Research Strategic Plan. A COM Research Committee works with the Western University Research Committee in what appears to be a successful collaborative approach. All required facilities and equipment are provided, and faculty actively conducting research are permitted adequate time to conduct their research. There was one Recommendation written for *Standard Seven: Research and Scholarly Activities*.

#### **Current Findings - Standard 7.1**

WesternU/COMP has been successful in contributing to the advancement of knowledge and the development of osteopathic medicine through scientific research. The appropriate committee structures (i.e., IRB and IACUC) are in place and functioning. Evidence of success is confirmed by the consistently increasing numbers of publications since 2007. Start-up funds are available, and grant management is accessible, for faculty support. Grants applied for since 2009 have held steady or slightly decreased, but grants received have increased since 2011, thus showing greater efficiency. Both the Pomona and Lebanon campuses have demonstrated evidence of research productivity for faculty and students. Ample research space exists on each campus, and this is supplemented by adequate internal funding, equipment purchase, and adequate allotted time for faculty to conduct research. Research efforts in OMM and NMM are encouraged. One example of Western University support is the creation of a Biosafety Level 3 capable facility for tuberculosis research. Students are included in research and scholarship whenever possible, and faculty spoke highly of opportunities to conduct research and institutional support of research. This Standard is met.

#### **Current Findings - Standard 7.2**

WesternU/COMP research is primarily supported in clusters for efficiency and to promote collaboration. Both the Pomona and Lebanon campuses have their own Research Committees which, in turn, contribute to Western University research goals. Students are included in research activities as evidenced by the STAR research symposium, student publications, and attendance at the Western University research meeting. Faculty in Oregon cited the opportunity to collaborate with colleagues at Oregon State University (OSU) which is about 23 miles away. OSU's MS in Medical Sciences program appears to be successful, and has led to positive scholarly outcomes, as well as being a "feeder" program to the WesternU/COMP-NW program. Western University is considering an academic research organization, and COM faculty would have opportunities to participate. Faculty expressed a desire for development of doctoral level programs, which would seem to be the next logical extension. This Standard is met. A Recommendation is written.

#### **Standard Eight: GME Outcomes**

#### Introduction

WesternU/COMP was the founder and catalyst of its OPTI, the OPTI West Educational Consortium. Collectively, the COM and OPTI have grown new osteopathic graduate medical education slots to a level which exceeds the needs of graduating students. The GME accountability report data meet or exceed the standard guidelines. The COM has implemented a comprehensive process for curriculum mapping which links institutional, program, and course objectives to mission elements and the 7 AOA Core Competencies. The Academic Progress Portal links numerous data sets to allow data oriented advice to progressing students and aggregated cohort data for use in strategic planning. The COM website contains required published data elements on GME placement COMLEX-USA passage. There was one Commendation written for *Standard Eight: GME Outcomes*.

#### **Current Findings – Standard 8.1**

WesternU/COMP is the founding member of the OPTI-West Educational Consortium. OPTI-West is accredited by the AOA's Council on Osteopathic Postdoctoral Training Institutions (COPTI). The COM's OPTI membership is evidenced in a 2007 memo from the COPTI and subsequent correspondence which reaffirms with high total point levels the continuing accreditation of OPTI-West which was granted a continuing five year accreditation on March 26, 2014. This Standard is met.

#### **Current Findings – Standard 8.2**

WesternU/COMP has fostered significant and continued growth of graduate medical education. OPTI-West has developed 32 new OGME programs and 437 GME positions since 2008, and increased positions in 28 programs. There is an active development process for continuing GME development. The Samaritan Health Services site in Oregon has seven active OGME programs annually graduating 33 residents. A resolution adopted by the AOA's Council on Postdoctoral Training praised OPTI-West for its efforts to increase the number of available osteopathic training positions. WesternU/COMP has some of the nation's leaders in GME development. Its strategic approach to GME development on the West Coast, especially in California and Oregon, is impressive. This Standard is met. A Commendation is written.

#### **Commendation:**

WesternU/COMP is to be commended as a national leader in successful strategic GME development.

#### **Current Findings – Standard 8.3**

WesternU/COMP has developed a retroactive GME accountability report which contains all the data elements required by this standard. The report data came from the COM's Annual Report to AACOM and the COCA Annual Supplemental Report, as well as internal data compiled for the Western University Board of Trustees. The report shows a 98% placement rate in PGY-1 positions. Moreover, trend analysis show that a consistent 40% of students place into AOA programs, indicating a need for 80 PGY 1 positions which is greatly surpassed by the available 208 OPTI-West positions. This Standard is met.

#### **Current Findings – Standard 8.4**

WesternU/COMP routinely reviews its students' COMLEX-USA performance as an indicator of preparedness for residency, including a comprehensive review of COMLEX-USA performance that is tied that back to the COM curriculum. The Academic Progress Portal is an innovative tool to track student progress in meeting their competencies. Discussions with clinical preceptors revealed that WesternU/COMP students at nine sites around each campus are well prepared for their clinical training and readiness for entering GME. This Standard is met.

#### **Current Findings – Standard 8.5**

All data elements listed in this standard are printed on the Institutional Research and Effectiveness page of the COM website. This Standard is met.

#### **SUMMARY OF REQUIREMENTS**

**Comprehensive Site Visit** 

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

There were no Requirements cited on this visit.

#### **COMMENDATIONS**

#### **Comprehensive Site Visit**

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

Standard 1.3	WesternU/COMP is to be commended for its strategic planning process and its linkage to key mission elements including academic achievement and outcomes assessment, research, and distinctive osteopathic health care delivery.
Standard 4.1	WesternU/COMP faculty members at both campuses are to be commended for their dedication and commitment to the institution and to their students.
Standard 4.4	WesternU/COMP is to be commended for the large number of faculty development programs that it provides to all of its faculty.
Standard 6.2	WesternU/COMP is to be commended for its encouragement, support, and response to the Student Driven Analysis. The institutions of the changes based upon the results have greatly enhanced the student experience on both campuses.
Standard 6.4	WesternU/COMP is to be commended for developing an extensive interactive, four-year interprofessional education program which will prepare its students for future comprehensive interactive care throughout their careers.
Standard 8.2	WesternU/COMP is to be commended as a national leader in successful strategic GME development.

#### **SUMMARY OF RECOMMENDATIONS**

#### **Comprehensive Site Visit**

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

Recommendations refer to advice given for the purpose of improving a COM's operations and programs. A recommendation does not signify that the COM does not comply with a standard. Recommendations made within the visiting team report serve as a mechanism for consultative advice to a COM. The AOA Commission on Osteopathic College Accreditation and subsequent visiting teams reviews recommendations only for informational purposes. Recommendations are not designated as elements of the official and final site visit report.

The following recommendations were cited at the [Year and Type of Visit] on-site visit. Current findings on these recommendations can be found in the official on-site visit report of the March 2015 Comprehensive visit.

#### **New Recommendations:**

2015-1 Standard 3.2	It is recommended that WesternU/COMP explore the purchase of a
	microphone system to use in its large classrooms so as to provide a more
	interactive learning environment.

## 2015-2 Standard 3.3 It is recommended that WesternU/COMP consider adding a librarian to help teach and assist students to navigate the learning resources provided, as well as to oversee learning resources at both campuses and affiliated sites.

# 2015-3 Standard 4.1.1 It is recommended that WesternU/COMP refine its faculty adequacy model, including time commitment for faculty travel between campuses, so that as an institution it can better ascertain the faculty need, per discipline/department, to better meet the needs of the students and faculty at each campus.

### 2015-4 It is recommended that the Western/COMP assessment office consider

Standard 6.14 conducting more comprehensive evaluations of clinical clerkships, including statistical analysis of student performance outcomes at individual clerkship sites.

## It is recommended that WesternU/COMP explore the development of doctoral level programs to complement its existing research and scholarly efforts.

#### **ROSTER OF VISITING TEAM & ASSIGNMENTS**

#### **Comprehensive Site Visit**

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

COLLEGE ADDRESS: 309 East 2nd Street/College Plaza; Pomona, CA 91766 200 Mullins Drive, Lebanon, OR 97355

TEAM MEMBER	EXPERTISE	ASSIGNMENT
James Cole, DO Retired COM Administration	Administration/Finance	Team Chair
Matthew Schure, PhD	Administration/Finance	Team Chair Administration/Finance
Kimberly Brown, PhD	Student Services	Student Services
Michael P. Mahalik, PhD	Preclinical Education	Preclinical Education
Samuel T. Coleridge, DO	Clinical Education	Clinical Education
Randall L. DeArment, DO, FACOFP	Clinical Education	Clinical Education
Linda Boyd, DO	Clinical Education	Evaluator Trainee Clinical Education
Stephen C. Jones, PhD	Preclinical Education	Evaluator Trainee Preclinical Education
Konrad C. Miskowicz-Retz, PhD, CAE	AOA Staff	Team Secretary

#### APPENDIX A

#### INDIVIDUALS INTERVIEWED AND DOCUMENTS REVIEWED

#### **Comprehensive Site Visit**

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

#### INDIVIDUALS INTERVIEWED BY SITE VISIT TEAM

- President, Western University
- Provost / COO, Western U
- Dean, WesternU/COMP
- Vice Dean, WesternU/COMP
- Associate Dean, Academic Affairs and Medical Education
- Associate Dean, Basic Medical Sciences and Research
- Associate Dean, Graduate Medical Education
- Associate Dean, Interprofessional Leadership, Assessment and Compliance
- Director of Operations, WesternU/COMP-NW
- Associate Dean, Pre-clinical Education
- Assistant Dean, Student Affairs
- Vice President for Research and Biotechnology
- Vice President for Enrollment Management and Univ. Student Affairs
- Director Learning Enhancement & Academic Development
- Director, Harris Family Center for Disability and Health Policy
- Director of Financial Aid
- Executive Director of Admissions
- Assistant Director of Admissions
- Discipline leads for pharmacology, physiology, microbiology, biochemistry, internal medicine
- Assistant Dean of Longitudinal and Experiential Learning
- Promotion and Tenure Committee
- Assistant Vice President of Enrollment Management / Registrar

- Assistant Dean, Interdisciplinary Professional Education and Director, Institute for Medical Educators
- Vice Chair, NMM/OMM
- Conference calls to clinical sites:
  Community Memorial HospitalVentura, Riverside County Regional
  Medical Center, Marian Regional
  Medical Center, Arrowhead Regional
  Medical Center, Salem clinic,
  Medford/Ashland clinic, Tacoma
  area, St. Charles Hospital in Bend,
  Interim GME Director, Portland area,
  Roseburg area clinic
- Student Performance Committees om Pomona and Lebanon
- Assistant Director of Operations
- Students at WesternU/COMP
- Clinical Site Visits: Hemet Valley Medical Center, Rancho Los Amigos
- Admissions Committee
- Research Committee
- Director, WesternU/COMP-NW Research Lab
- Chair, Department of Anatomy
- Director, Clinical Education Pomona
- Director, Clinical Education Lebanon
- SGA Class officers for classes of 2017 and 2018
- Curriculum Committee
- Staff of Offices of Career and Professional Development – Pomona and Lebanon
- Assistant Dean, Community Engagement – Lebanon

- Director, Clinical Education
- Discipline chairs for Family Medicine, NMM/OMM, Internal Medicine, Pediatrics, Clinical Sciences/PM&R, Surgery, Psychiatry, Pathology, OB/Gyn
- Senior Director, Office of Medical Simulation
- Board of Trustees members
- Assistant Dean, Academic Informatics
- Assistant Dean of Longitudinal & Experiential Learning
- Executive Director of Information Technology
- Technology Lead, Lebanon
- Executive Director of the University Library
- Student Performance Committee Lebanon
- Research Committee Lebanon
- Student leadership of classes of 2016, 2017 and 2018 Lebanon

- Vice Chair NMM/OMM Lebanon
- Vice Chair Family Medicine Lebanon
- Vice Chair Pediatrics Lebanon
- Vice Chair Anatomy Lebanon
- Director of Student Affairs Lebanon
- Vice Chair Basis Medical Sciences Lebanon
- Director, Standardized Patient Program
- Simulation and Clinical Skills Educator
- Assistant Vice President, Oregon Campus Operations
- Clinical Visit to Adventist Medical Center, Portland
- Student Services Office Lebanon (7#)
- Preclinical and Clinical Vice Chairs, Lebanon: Anatomy, Basic Medical Sciences, Family Medicine, NMM/OMM, Pediatrics
- Admissions Committee Lebanon
- Clinical Visits to Good Samaritan Regional Medical Center, Corvallis, OR and Samaritan Lebanon Community Hospital, Lebanon

#### **DOCUMENTS REVIEWED BY SITE VISIT TEAM**

- Self study: 181 pages of narrative prose
- Self study: Appended materials for self-study
- WesternU/COMP committee list
- WesternU/COMP organization chart
- WesternU/COMP student driven analysis of both campuses
- Department Chairs' CVs
- Executive Leadership Team's CVs
- Faculty CVs
- College Catalog
- COMP Faculty Handbook
- WesternU/COMP New Student Guidebook
- WesternU/COMP-NW New Student Guidebook
- WesternU Employee Handbook
- WesternU Faculty Handbook
- WesternU/COMP Leadership Org Chart
- Affiliation Agreements with Cover letters
- Active Agreements as of 2015-03-11
- Course Reports and Course Evaluations SharePoint

#### APPENDIX B

#### COM BACKGROUND INFORMATION

#### **Comprehensive Site Visit**

Western University of Health Sciences/College of Osteopathic Medicine of the Pacific Western University of Health Sciences/College of Osteopathic Medicine of the Pacific-NW March 16-20, 2015

COM Address:	309 East 2nd Street/College Plaza; Pomona, CA 91766 200 Mullins Drive, Lebanon, OR 97355
DEAN:	Paula M. Crone, DO
APPROVED CLASS SIZE:	WesternU/COMP – 220; WesternU/COMP-NW - 100

ACADEMIC YEAR: 2014-2015 (verified)

STUDENTS				
Ī	MSI	MSII	MSIII	MSIV
NUMBER OF STUDENTS (POMONA, CA)	228	223	217	224
NUMBER OF STUDENTS	110	100	108	98

#### **FACULTY**

Basic Science				
	Full Time	Part Time	Volunteers <200 hrs.	Volunteers 200+ hrs.
NUMBER OF FACULTY (POMONA, CA)	23	7	0	0
NUMBER OF FACULTY (LEBANON, OR)	9	1	0	0
TOTAL				4.0
BASIC SCIENCE				40

#### COM BACKGROUND INFORMATION

Clinical Science				
	Full Time	Part Time	Volunteers <200 hrs.	Volunteers 200+ hrs.
NUMBER OF FACULTY (POMONA, CA)	32	13	ALL VOLUNTEERS	1994
NUMBER OF FACULTY (LEBANON, OR)	12	6	ON BOTH CAMPUSES	
TOTAL				
CLINICAL SCIENCE				2057

#### ACCREDITATION DECISION HISTORY

TYPE OF VISIT	DATE OF SITE VISIT	DATE OF BPE/COCA DECISION
COMPREHENSIVE	APRIL 3-6, 2001	June 2001
FOCUSED VISITATION	NOVEMBER 7, 2003	JANUARY 2004
FOCUSED VISITATION	JANUARY 14, 2005	APRIL 2005
FOCUSED VISITATION	JANUARY 22-23, 2007	APRIL 2007
COMPREHENSIVE	JANUARY 30-FEB. 1, 2008	APRIL 2008
FOCUSED VISITATION	JUNE 16-17, 2010	AUGUST 2010
FOCUSED VISITATIONS	JANUARY 17, 2012 (CA) JANUARY 18-19, 2012 (OR)	APRIL 2012
FOCUSED VISITATIONS	JANUARY 29, 2014 (CA) JANUARY 30-31, 2014 (OR)	MAY 2014
COMPREHENSIVE	MARCH 16-20, 2015	AUGUST 2015