RESPONSE
TO THE COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION (COCA)
COMPREHENSIVE ACCREDITATION SITE VISIT REPORT
April 2012

Standard 1.1
Requirement: KCUMB-COM must publish its new mission statement in its catalog and online materials.
Kansas City University of Medicine and Biosciences has updated both documents to reflect the most current mission statements. This update was completed on 11 December 2011. This information can be found on the web at http://www.kcumb.edu/visitors/mission.asp and in the University catalog at http://www.kcumb.edu/students/College_catalog.pdf.

Standard 3.3
Requirement: KCUMB-COM must document the formal facilities evaluation process that includes information shared with the affiliated sites and any documentation of plans for improvement and progress toward improvement.
The training environments at affiliated educational sites are reviewed by Office of Community Clinical Education during annual site visits with the affiliated clinical site Director of Medical Education and/or appropriate staff. This visit includes discussions verifying number of clinical presentations, daily supervision, and interactions with other healthcare professionals. A site report for each visit is completed with the following information:

- 3rd & 4th Year Clerkships
- Clerkship by Specialty Patient Presenting Reports
- Clerkship Coordinator
- Clerkship Site Performance Data
- Deficiency
- Director of Medical Education
- Duties of DME
- Facility Resources
- Faculty by Department
- Hospital Name/Location
- Hospital Statistics
- Meal Benefits
- Residency Information
- Resolution to Deficiency
- School Affiliations
- Site Focus
- Student Feedback
- Student Housing
- *Comment Section

Notations of site deficiences are made at the time of the annual visit. Follow-up regarding any issues or deficiencies is made by Office of Community Clinical Education.

A new organizational structure for KCUMB-COM has been in the planning for the past two years. This plan includes budgeting for new regional assistant deans; these regional deans will provide continuous evaluation of the facilities and personnel at affiliated sites. In addition, they will monitor identified strengths and weaknesses and assist in quality improvement initiatives as well as convey curricular recommendations between the site and KCUMB-COM. Pending final approval y the Board of trustees, the Regional Deans will meet quarterly; July and January in Kansas City, April at the annual meeting of the Association of Osteopathic Directors and Medical Educators (AODME) and October at the annual meeting of the American Osteopathic Association (AOA), to coordinate educational activities with clinical chairs, the Associate Dean of Clinical Education and Medical Affairs and the Associate Dean of Curricular Affairs.

Standard 4.1 and Standard 4.1.1

Requirement: KCUMB-COM must finalize its faculty adequacy model, including both on-campus faculty and faculty at clinical rotation sites and demonstrate that the COM has sufficient faculty to deliver its curriculum. The faculty adequacy model, along with an explanation of how it has **been calculated, must be submitted to the COCA by 1 July 2012.**

KCUMB-COM has been tracking faculty adequacy for the past eight years. The 2009-10 data was provided during the site visit. The 2010-11 and 2011-12 faculty data is currently being populated. The Faculty Senate has been involved throughout the past two years as KCUMB-COM has worked to review and develop a new faculty adequacy plan and model.

A preliminary analysis of faculty adequacy for on campus clinical and basic science faculty has been completed utilizing curricular teaching hours. The analysis shows an excess of FTE for teaching Subsequent to information provided at the AACOM 2012 Annual Meeting regarding faculty adequacy models and their calculations, analysis of adequacy including research, service and administrative time will be undertaken. A survey has been developed to capture individual faculty's time allocation for non-teaching activities. This survey is scheduled to be deployed in May 2012. The final draft of the faculty adequacy model will be sent to the Faculty Senate in June 2012 for implementation in the fall of 2012.

Note: *Dr. Dougherty has reported that OCCE has completed an analysis of faculty adequacy by clinical discipline at regional rotation sites. Analysis of the data indicates sufficient capacity at all sites, although there is variability and some sites have a limited reserve while others have an abundance. However, no model for the analysis is provided to show how faculty adequacy is calculated. We will need to include this model and explain the calculation for the 1 July 2012 report - MSC*

Standard 4.1.2

Requirement: KCUMB-COM must complete credentialing for all faculty at its COM affiliated and educational teaching sites and must develop and implement processes and procedures for maintaining complete and current faculty files, including diplomas, transcripts, board certifications, CVs and licenses, for those faculty. Documentation that the faculty credentialing is completed and of the new process for maintaining complete faculty files must be submitted to the COCA by 1 July 2012.

Response per the Associate Dean of Clinical Education and Medical Affairs: Criteria and Guidelines for Appointment and Promotion of Faculty by the Rank and Promotion Committee have been recently modified to address this issue (*or has this only been a request? – MSC*). To achieve a rank of Clinical Instructor in (Name of Department), community faculty at this rank participate in teaching in the clinical setting. A commitment to teaching must be evident. In addition, the Clinical Instructor must contribute to teaching and patient care programs of Kansas City University of Medicine and Biosciences College of Osteopathic Medicine, demonstrate a commitment to teaching in the clinical setting and have state licensure. KCUMB-COM is also currently undertaking a pilot study with the Federation of State Medical Boards to facilitate and expedite the credentialing process.

Note: No information has been provided regarding the process and procedure for maintaining complete and accurate faculty files or where this information will be stored. Personally I think the response that Dr. Adkison provided for standard 6.10 may better and more fully addresses this requirement - MSC

Standard 4.4
Requirement: KCUMB-COM must present Faculty development in OPP to all faculty, both on-campus and **off-campus, on a regular basis.**

Standard 4.4.1
Requirement: KCUMB-COM must present Faculty development in OPP to all faculty, both on-campus and off-campus, on a regular basis. A plan for presentation of OPP faculty development must be submitted to the COCA by 1 July 2012.

An annual session on osteopathic philosophy will be added to the faculty development schedule for 2012-13. Development of a multi-year faculty development curriculum on osteopathic philosophy and osteopathic manipulative treatment was outlined in April 2012 with the Director of Osteopathic Clinical Skills. A fuller description of the faculty development offerings and a schedule will be provided in June 2012. The Office of Institutional Effectiveness has developed a Faculty Needs Assessment Survey that will be sent to the faculty both on and off campus in May 2012.

The Office of Community Clinical Education and the Information Technology division are coordinating the creation of a page within the faculty development website that provides development training regarding OPP. This site will house content from the one day faculty development workshop (The "Preceptor Toolbox") from the 2011 homecoming CME as well as the Director of Osteopathic Clinical Skills' lecture on supervision of osteopathic medical students and resident by allopathic physicians. In addition, all MS I and MS II Osteopathic Clinical Skills labs will be made available. Relevant training videos from American College of Osteopathic Family Physicians (ACOFP) and the Council on Osteopathic Principles (ECOP) will be made available on the external website for preceptor use as they become available. Questions will be developed by the Associate Dean of Clinical Education and Medical Affairs and will follow at the conclusion of viewing each online development session. responses will provide an effective source for tracking viewing and completion of preceptor and DME development

Standard 5.3.2
Requirement: KCUMB-COM needs to add "ethnicity" and "sex" to its non-discrimination policy in both the Catalog and Student Handbook.
"Ethnicity and "sex" have been added to its non-discrimination policy in the KCUMB college catalog http://www.kcumb.edu/students/College_catalog.pdf and the student handbook as of 11 December 2011.

Standard 5.4.1
Requirement: KCUMB-COM must add to its transfer policy in the KCUMB-COM Catalog that it will consider transfer credits from a college of osteopathic medicine that is accredited by the COCA.
The transfer policy has been added to the KCUMB college catalog http://www.kcumb.edu/students/College_catalog.pdf and the student handbook as of 11 December 2011.

Standard 6.6

Requirement: KCUMB-COM must implement a tracking system that completes the assessment plan to include the achievements of the graduates beyond the residency matching process. Documentation of the plan and its implementation must be submitted to the COCA by 1 July 2012.

Tracking of graduates and their achievements is managed by Advancement/Alumni Relations. Graduates will be offered two mechanisms to update KCUMB-COM on their career path and achievements. An initial survey will be deployed to obtain information on employment history and achievements. Graduates will also be contacted separately with a link to the updated KCUMB-COM external website. Under the Alumni and Friends Section, graduates will be able to update their personal information as well as problem a copy of their CV. Information updates will also be solicited from graduates at annual meetings of the AOA, AACOM and MAOPS.

Standard 6.10

Requirement: KCUMB-COM must complete credentialing for all faculty at its COM affiliated and educational teaching sites and must develop and implement processes and procedures for maintaining complete and current faculty files, including diplomas, transcripts, board certifications, CVs and licenses, for those faculty. Documentation that the faculty credentialing is completed and of the new process for maintaining complete faculty files must be submitted to the COCA by 1 July 2012.

Credentials of all faculty serving as preceptors for clinical clerkships are reviewed and approved by the Office of Community Clinical Education prior to the student beginning the clerkship. Confirmation for all current clinical faculty at affiliated and educational teaching sites has been accomplished. Faculty who choose to pursue academic appointment, in addition to being a clinical instructor, must submit supplemental required documentation to support the requested rank. Requests for academic rank are reviewed and approved by the department chair, the Rank and Promotion Committee with final approval coming from the Executive ice President of Academic and Medical Affairs and Dean of the COM. To date, all community clinical faculty who have requested academic rank through Kansas City University of Medicine and Biosciences College of Osteopathic Medicine have received appointment.

Processes pursued to support continued maintenance of preceptor credentialing includes an electronic database development through direct contact with every clinical site and preceptor confirming and/or updating the clinicians' demographics to include a current email.

The updated database will be utilized to implement an online faculty profile, currently under development, that will allow the individual clinical faculty to confirm and maintain their personal credentials and include the ability to upload required documents. KCUMB-COM, in collaboration with the Federation of State Medical Boards, a pilot project to develop a centralized national database for clinical preceptors has been initiated through which all information on these profile pages are verified. A link to the profile can then be sent the preceptor annually to allow ongoing maintenance. Conclusion of the initial pilot project is targeted for this fall.

Standard 6.11

Requirement: KCUMB-COM must provide a clinical educational infrastructure on campus and at the affiliated clinical sites that supports cooperative instructional activity. Documentation of the plan and the COM's progress in implementing the plan must be submitted to the COCA by 1 July 2012.

KCUMB-COM has been in the planning a new organizational structure for the past two years. This plan has been presented to the Board of Trustees and includes budgeting for new regional assistant deans; financial

support for their efforts is pending. Under the new structure, KCUMB-COM will consolidate its sites into five regions. The regional deans will be responsible for:

- At a minimum, quarterly interaction with
  - Students
    - Present didactic materials to include OMM
    - Provide guidance for clerkship opportunities and selection
    - Council on career guidance
    - Serve as a conduit of issues and concerns to the University
  - Site Director, and/or Administrative Directors of Medical Education
    - Review site performance data with Directors of Medical Education
    - Discuss identified strengths and weaknesses
    - Identify and assist with faculty development based on performance
    - Convey curricular recommendations between the site and KCUMB-COM
  - KCUMB-COM
    - Collaborate to identify curricular needs for clinical education
    - Assist in identifying relevant issues for poorly performing students and sites
    - Participate and contribute to didactic development for clinical education
    - Implement continuous quality improvement of program development and growth

The regional deans will meet quarterly; July and January in Kansas City, April at AODME and October at AOA, to coordinate educational activities with clinical chairs, the Associate Dean of Clinical Education and Medical Affairs and the Associate Dean of Curricular Affairs.
A firewall protected online Student Activity Profile Page has been developed that will provided the regional deans immediate, online access to relevant educational information about students. This website is currently under additional development to allow limited access to DME's and ADME's only for the students of which they are responsible. This tool will allow an additional degree of collaboration between the affiliated sites and KCUMB.

Standard 6.12
Requirement: KCUMB-COM must develop and implement a formal process for feedback and improvement at its clinical sites to ensure that these sites meet the COM's mission and objectives. Documentation of the creation and implementation of this process must be submitted to the COCA by 1 July 2012

During the COCA self-study process, collection of data from sites by clerkship and student was initiated. Because the number of students at sites is variable with some sites having less than ten students, it was in the best interest of the program to collect data for two years prior to sharing the data with sites in order to provide results from a reasonable number of students at all sites.

- Percent of students receiving Satisfactory, High Satisfactory, and Honors for all nine required year 3 clerkships at the site
- Two-year mean of Subject Exam scores at the site compared to the overall KCUMB-COM mean

- COMLEX Level 2-CE discipline means for students at the site compared to the overall KCUMB-COM discipline means.

Since these data were presented, the mean COMSAE Level II scores for the site have been added to the report. In addition, data demonstrating the most frequently encountered patient presentations and the most frequently encountered procedures or clinical activities have been evaluated for all required clerkships by sites. These data have been added to each site report. Site data are compared with those reported by all KCUMB-COM students. Sites with data more than two standard deviations below the KCUMB-COM mean are reviewed and comments noted. These reports are shared with the Directors of Medical Education during visits by the Associate Dean for Clinical Education and Medical Affairs or designated KCUMB-COM personnel. Areas of concern are discussed and responses from the sites are documented. Sharing of these reports with the DMEs began in April 2012.