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**COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION**

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**VIA EMAIL ONLY:** [ttold@rvu.edu](mailto:ttold@rvu.edu)

October 16, 2020

Thomas N. Told, DO  
Dean and Chief Academic Affairs Officer  
Rocky Vista University College of Osteopathic Medicine  
8401 Chambers Road  
Parker, CO 80134

Dear Dr. Told:

At its October 8, 2020 meeting, the Executive Committee of the American Osteopathic Association Commission on Osteopathic College Accreditation (COCA EC) reviewed the information submitted by the Rocky Vista University College of Osteopathic Medicine (RVUCOM) on September 25, 2020 in support of the request from RVUCOM for approval of a substantive change – planned class size increase.

Background on Request

The COCA considered RVUCOM's application for approval of the substantive change at its August 2020 meeting. At the August meeting, the COCA voted to request that RVUCOM submit written documentation of information provided in oral testimony with respect to Element 7.1: Faculty and Staff Resources and Qualifications (CORE) and Element 7.8 Faculty Appointment and Advancement. The COCA also authorized the COCA EC to review the documentation and, if appropriate, take action on the RVUCOM substantive change request.

At its September 10, 2020 meeting, the COCA EC reviewed the documentation submitted by RVUCOM in support of its request for a class size increase. On motion, with second and following discussion, the COCA EC voted to find that Element 7.1 is not met. In reaching this decision on Element 7.1, the COCA EC found that the documentation did not support RVUCOM's representation that the student to faculty ratio for instruction in Osteopathic Manual Medicine (OMM) would be 8:1. Instead, the documentation indicated that in reaching the 8:1 ratio, RVUCOM was including predoctoral OMM fellows, who the COCA EC did not believe to be properly counted as faculty. The COCA EC requested that RVUCOM demonstrate faculty adequacy for OMM by presenting documentation of hiring adjunct or full-time faculty. Alternatively, because the 8:1 ratio for purposes of faculty adequacy in OMM is based on RVUCOM's presentation to the COCA and not a COCA standard/element, RVUCOM could have also presented different instruction plan.

The COCA EC Decision

As noted above, on October 8 the COCA EC reviewed the documentation submitted by RVUCOM in support of its request for a class size increase. On motion, with second and following discussion, the COCA EC, finding that the planned student to faculty ratio of 8:1 can be met with current faculty for the increased class size at the Parker, Colorado campus, voted to find that Element 7.1 is met regarding the

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requested class size increase of 50 students (for a total class size of 200 students) at the Parker, Colorado campus.

In further action, the COCA EC found that the documentation provided for the Ivins, Utah campus did not demonstrate adequate OMM faculty to satisfy RVUCOM's plan of a student to faculty ratio of 8:1. The OMM lab student to faculty ratio with the requested class size increase and current faculty (50 students with 6 faculty) is 8.33:1. However, the COCA EC noted that successful completion of the planned hiring described in the materials submitted by RVUCOM would be sufficient to achieve the 8:1 ratio.

Therefore, the COCA EC approves RVUCOM increasing the class size at its Ivins campus by 23 students (for a total of 148 students) which allows for the student to faculty ratio of 8:1 for the OMM lab. The additional two students may be approved when RVUCOM can demonstrate implementation of the plan described to hire additional full time and adjunct faculty. Alternatively, RVUCOM may alter its class size increase request at the Ivins, Utah campus or, because the 8:1 ratio for purposes of faculty adequacy in OMM is based on RVUCOM's presentation to the COCA and not a COCA standard/element, RVUCOM could present different instruction plan.

Commissioner David Forstein DO was recused from discussion and voting. Commissioner John Kauffman DO served as Chair during deliberations and voting on RVUCOM and, in the absence of a tie vote, did not vote on this issue.

Please submit any additional documentation on RVUCOM's planned class size increase request to [predoc@osteopathic.org](mailto:predoc@osteopathic.org) by Monday, October 26 for review at the November COCA EC meeting.

If you have any questions concerning this decision, please contact me directly at (312) 202-8024 or [jprober@osteopathic.org](mailto:jprober@osteopathic.org).

Sincerely,



Joshua L. Prober, JD

Interim Secretary, Commission on Osteopathic College Accreditation

C: David A. Forstein, DO, Chair, COCA  
John M. Kauffman Jr, DO, FACOI, FACP, Vice Chair, COCA  
Cheryl Johnston, Executive Assistant to the Dean & Chief Academic Officer, RVUCOM