

SUBJECT: APPROVAL OF REVISED HANDBOOK OF THE PROGRAM AND
TRAINEE REVIEW COUNCIL

SUBMITTED BY: Bureau of Osteopathic Education/Council on Postdoctoral Training/
Program and Trainee Review Council

REFERRED TO: Reference Committee 4

1 RESOLVED that the following REVISIONS to the Handbook of the Program and Trainee Review
2 Council be APPROVED.

(Old material crossed out, new material in capitals; See Attachment)

ACTION TAKEN _____

DATE _____

Handbook of the
PROGRAM & TRAINEE REVIEW COUNCIL

American Osteopathic Association
Department of Education
Division of Postdoctoral Training
142 E. Ontario Street
Chicago, Illinois 60611
800-621-1773

BOT 10/2003
Rev PTRC 7/2008, COPT 8/2008
Rev PTRC 4/2009, COPT 5/2009, BOE 6/2009

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1 HANDBOOK OF THE PROGRAM AND TRAINEE
2 REVIEW COMMITTEE (PTRC) COUNCIL OF THE
3 COUNCIL ON POSTDOCTORAL TRAINING

4 **INTRODUCTION**

5 The Handbook of the Program and Trainee Review ~~Committee~~ COUNCIL (*HANDBOOK*)
6 PTRC) of the Council on Postdoctoral Training is a procedural guide established for the use of
7 the PROGRAM AND TRAINEE REVIEW COUNCIL (PTRC) and other AOA officers. This is
8 an official document adopted by action of the AOA Board of Trustees (AOA Board), ~~and may be~~
9 ~~amended from time to time.~~ The *Handbook* includes a description of the PTRC's purpose,
10 function, structure, AND operating procedures of THE COUNCIL ~~and pertinent attached~~
11 ~~appendices.~~ The PTRC serves as a standing, subordinated ~~committee~~ COUNCIL of the Council
12 on Postdoctoral Training (COPT) ~~of the~~ in specified, selective areas of osteopathic graduate
13 medical education (OGME).

14 ~~This is an official document adopted by action of the AOA Board of Trustees.~~ THE PTRC
15 SHALL CONDUCT ITSELF ACCORDING TO THE PROCESSES STATED IN THIS
16 *HANDBOOK* AND SHALL REVIEW THE *HANDBOOK* EVERY TWO YEARS.
17 PERMANENT Copies of the *Handbook* are ON FILE at the American Osteopathic Association,
18 Department of Education, 142 East Ontario Street, Chicago, Illinois 60611 AND ARE POSTED
19 TO DO-ONLINE.

20
21 I. STATEMENT OF PURPOSE

22
23 A. ORGANIZATION AND HISTORY

24
25 The current structure and role of the PTRC was created by action of the AOA Board of Trustees
26 at its February 2003 meeting (see Resolution 53(M/2003, "Task Force to Study the Structure of
27 the Department of Educational Affairs") as a functional successor to the former ECCOPT. ~~The~~
28 ~~PTRC evolved from the former Executive Committee of the Council on Postdoctoral Training~~
29 ~~(ECCOPT) established in 1993~~ The PTRC is a representative body composed of members from
30 AOA affiliate organizations created to assure the COPT, BOE, AOA Board, osteopathic medical
31 professional and general public that postdoctoral training programs are operating within
32 approved standards, rules and regulations, and ~~are providing~~ PROVIDE educational training
33 satisfactory to the public interest. The PTRC also has the obligation to deliberate and
34 recommend policy revisions to the COPT, Bureau of Osteopathic Education (BOE) and the AOA
35 Board of Trustees for improvements in postdoctoral education.

36
37 B. FUNCTIONS AND RESPONSIBILITIES ~~The responsibilities of the PTRC are:~~

38
39 THE PRIMARY RESPONSIBILITIES OF THE PTRC ARE TO serve as THE a decision
40 making body for AOA-approved internship programs, residency programs, FELLOWSHIP AND
41 ~~SUBSPECIALTY TRAINING PROGRAMS~~ AND FOR individual training approvals. In this
42 capacity, actions OF THE PTRC ARE FINAL. THESE ACTIONS may be appealed to the BOE

1 Appeal Committee, decisions of WHICH ~~the BOE Appeal Committee~~ may be appealed to the
2 AOA Board. ~~for a final decision.~~ THE COUNCIL ALSO serveS as an advisory body on policy
3 to the COPT. THE COUNCIL SHALL:

- 4
- 5 1. Review AND TAKE FINAL ACTION ON ~~recommendations for~~ POSTDOCTORAL
6 TRAINING ~~internship and residency~~ programS, INCLUDING CONSIDERATION
7 OF PROGRAM approvals, denials, and increases ~~or decreases~~ in APPROVED
8 POSITIONS, MONOTORING OF COMPLIANCE WITH CORRECTIVE ACTION
9 PROCEDURES, OR OTHER PROGRAMMATIC VIOLATIONS OF THE AOA
10 BASIC DOCUMENT. ~~-size~~

11

12 A)Recommendations on internship programs are received from the Internship
13 Evaluating Committee (IEC). Recommendations on residency AND FELLOWSHIP
14 training programs are received from the educational evaluating committees of the
15 specialty practice affiliates.

- 16
- 17 2. Review AND ACT ON requests for approval of individual trainee’s internship or
18 residency training and make final actions.

- 19
- 20 3. PROVIDE OVERSIGHT FOR THE IMPLEMENTATION OF THE VOLUNTEER
21 BASED INSPECTION PROCESS

22

- 23 A. ~~4.~~ The PTRC shall review AND APPROVE lists of qualified surveyors
24 submitted by the specialty colleges and the AODME annually at its fall
25 meeting.

26

- 27 B. ~~5.~~ The PTRC, in cooperation with the Division of Postdoctoral Training IEC
28 shall compose REVIEW a list of qualified, experienced surveyors who shall
29 be team captains for intern on-site surveys. This list will be reviewed
30 annually and updated at the spring FALL meeting of the PTRC.

- 31
- 32 ~~3.~~ 4. Report its actions to the COPT for informational purposes.

- 33
- 34 ~~4.~~ 5. Advise the COPT on policy development needs in OGME.

35

36

37 II. COUNCIL STRUCTURE AND GENERAL PROCEDURES

38

39 A. General Aspects of PTRC Membership

- 40
- 41 1. The PTRC has twelve (12) voting members as enumerated in section II ~~III.C of this~~
42 ~~document (see below).~~
 - 43 2. The PTRC has TWO (2) non-voting liaison members as enumerated in Section II ~~III~~
44 ~~.C of this document (see below). The liaison members shall have~~ WITH rights to
45 review and debate matters before the PTRC without ~~the vote ing~~ privilege.

- 1 3. Appointment of representative and at-large members to the PTRC will be staggered
2 and limited to no more than three consecutive three-year terms for nine (9) years
3 cumulative. Membership and chairperson appointments would be limited to a
4 maximum of nine consecutive years and six years respectively in any one bureau,
5 council or committee.
- 6 4. All specialty college representatives shall be certified in the specialty they represent.
- 7 5. All specialty college representatives shall be members of their educational evaluating
8 committees.
- 9 6. All osteopathic physicians on the PTRC must be members in good standing of the
10 AOA and shall conform to its constitution, bylaws and code of ethics.
- 11 7. No member of the AOA Board of Trustees, the BOE Bureau of Osteopathic
12 Education (BOE), or any other AOA education or accreditation bureau or council
13 shall simultaneously hold a position on the PTRC.

14
15 B. Appointment of Officers and Terms of Office

16
17 1. Chair

18 The Chair will be appointed by the AOA President from among the membership of
19 the PTRC for a two-year term of office. The Chair may serve a maximum of three (3)
20 two-year terms within the limit of three three-year terms of membership.

21 Any voting member of the PTRC is eligible to be appointed to the position of Chair.

22 THE CHAIR SHALL NOT PARTICIPATE IN PROGRAM REVIEWS.

23 ~~PARTICIPATION IN INSTITUTIONAL REVIEWS IS ALLOWED.~~

24
25 2. Vice-Chair

26 The Vice-Chair will be appointed by the AOA President from among the membership
27 of the PTRC for a one-year term of office. Any voting member of the PTRC is
28 eligible to be appointed to the position of Vice-Chair. The Vice-Chair may not be
29 from the same specialty college as the Chair.

30
31 3. Secretary

32 ~~The Director, Staff of the Division of Postdoctoral Training, AS DETERMINED BY~~
33 ~~THE DIRECTOR OF the AOA Department of Education WILL serve as Secretary~~
34 ~~without vote. The Secretary shall be the administrator for the PTRC; and will serve~~
35 ~~without vote. The Secretary shall be responsible for both recording and corresponding~~
36 ~~secretarial activities of the PTRC;—The Secretary AND shall maintain technical~~
37 ~~expertise in the areas of responsibility of the PTRC and make the PTRC aware of~~
38 ~~trends in these areas.~~

39
40 C. Appointment of Members and Terms of Office

41
42 1. PERMANENT REPRESENTATION WILL BE AS FOLLOWS FOR EIGHT (8)
43 COUNCIL POSITIONS:

- 44
- 45 • 1 - Representative from within the Association of Osteopathic Directors and
46 Medical Educators (AODME)

- 1 • 1 - REPRESENTATIVE FROM the Association of Military Osteopathic
2 Physicians and Surgeons (AMOPS)
- 3 • 1 - Representative ~~nominated by~~ OF the American College of Osteopathic
4 Internists (ACOI) ~~education-evaluating-committee~~
- 5 • 1 - Representative ~~nominated by~~ OF the American College of Osteopathic
6 Surgeons (ACOS) ~~education-evaluating-committee~~
- 7 • 1 - Representative ~~nominated by~~ OF the American Osteopathic Academy of
8 Orthopedics (AOAO) ~~education-evaluating-committee~~
- 9 • 1 - Representative ~~nominated by~~ OF the American College of Osteopathic
10 Family Physicians (ACOF) ~~education-evaluating-committee~~
- 11 • 1 - Representative ~~nominated by~~ OF the American College of Osteopathic
12 Obstetricians and Gynecologists (ACOG) ~~education-evaluating-committee~~
- 13 • 1 - Representative ~~nominated by~~ OF the American College of Osteopathic
14 Emergency Physicians (ACOEP) ~~education-evaluating-committee~~
- 15

16 2. At-LARGE MEMBERSHIPS WITH TERMS OF TWO YEARS WILL BE
17 NOMINATED AND APPOINTED ACCORDING TO THE SCHEDULE SET BY
18 THE AOA BOARD IN ALTERNATING CYCLES FOR A TOTAL OF FOUR (4)
19 MEMBERS AND TO INCLUDE THE FOLLOWING AFFILIATES.

20
21 A. BEGINNING IN JULY 2007, EACH AFFILIATE IN GROUP A WILL
22 HAVE ONE (1) REPRESENTATIVE FOR A TWO YEAR TERM:

- 23
- 24 • 1 – REPRESENTATIVE OF THE AMERICAN OSTEOPATHIC COLLEGE
25 OF ANESTHESIOLOGISTS (AOCA)
- 26 • 1 – REPRESENTATIVE OF THE AMERICAN OSTEOPATHIC COLLEGE
27 OF DERMATOLOGY (AOCDD)
- 28 • 1 – REPRESENTATIVE OF THE AMERICAN COLLEGE OF
29 OSTEOPATHIC PEDIATRICIANS (ACOP)
- 30 • 1 – REPRESENTATIVE OF THE AMERICAN OSTEOPATHIC COLLEGE
31 OF OCCUPATIONAL & PREVENTIVE MEDICINE (AOCOPM)
- 32 • ~~1 – REPRESENTATIVE OF THE AMERICAN OSTEOPATHIC COLLEGE~~
33 ~~OF OPHTHALMOLOGY AND OTOLARYNGOLOGY – HEAD AND~~
34 ~~NECK SURGERY (AOCOO-HNS)~~
- 35

36 B. BEGINNING IN JULY 2009, EACH AFFILIATE IN GROUP B WILL
37 HAVE ONE (1) REPRESENTATIVE FOR A TWO YEAR TERM:

- 38
- 39 • 1 – REPRESENTATIVE OF THE AMERICAN ACADEMY OF
40 OSTEOPATHY (AAO)
- 41 • 1 – REPRESENTATIVE OF THE AMERICAN OSTEOPATHIC COLLEGE
42 OF RADIOLOGY (AOCR)
- 43 • 1 – REPRESENTATIVE OF THE AMERICAN COLLEGE OF PHYSICAL
44 MEDICINE AND REHABILITATION (AOCPMR)

- 1 • ~~1 – REPRESENTATIVE OF THE AMERICAN OSTEOPATHIC COLLEGE~~
- 2 ~~OF OCCUPATIONAL & PREVENTIVE MEDICINE (AOCOPM)~~
- 3 • 1 – REPRESENTATIVE OF THE AMERICAN OSTEOPATHIC COLLEGE
- 4 OF OPHTHALMOLOGY AND OTOLARYNGOLOGY – HEAD AND
- 5 NECK SURGERY (AOCOO-HSN)
- 6

7 C. THERE ARE NO CONSECUTIVE 2-YEAR TERMS OF APPOINTMENT

8 FOR ANY AT-LARGE SPECIALTY AFFILIATE.

9

10 3. Non-voting liaison members will be appointed as follows:

11

- 12 • 1 - Liaison Member from the Council on Postdoctoral Training (COPT)
- 13 • 1 - Liaison Member from the Bureau of Osteopathic Specialties (BOS)
- 14

15 4. EACH REPRESENTATIVE SHALL BE APPOINTED FROM A LIST OF UP TO

16 THREE (3) NOMINEES SUBMITTED BY THE AFFILIATE GROUP TO THE

17 AOA PRESIDENT-ELECT AND THE SECRETARY WILL SEND A REQUEST

18 FOR NOMINATIONS TO AFFILIATES FOR EACH APPOINTMENT CYCLE.

19

20 5. ADVISORS

21

22 THE AOA PRESIDENT, PRESIDENT-ELECT, EXECUTIVE DIRECTOR, CHAIR

23 OR VICE CHAIR OF THE DEPARTMENT OF EDUCATIONAL AFFAIRS MAY

24 MEET WITH THE PTRC AS NON-VOTING ADVISORS ON POLICIES AND

25 PROCEDURES OF THE AOA AS APPLICABLE TO THE PTRC.

26

27 6. OBSERVERS

28

29 A. BY PRECEDENT MEETINGS OF THE PTRC ARE OPEN MEETINGS.

30 OBSERVERS ARE ASKED TO NOTIFY THE CHAIR OR SECRETARY OF

31 THE PTRC OF THEIR INTENT TO ATTEND.

32

33 B. THE PRESENCE OF OBSERVERS SHALL BE ACKNOWLEDGED BY THE

34 CHAIR AND RECORDED IN THE PTRC MINUTES.

35

36 D. MEETINGS OF THE PTRC

37

38 1. THE PTRC WILL MEET THREE TIMES A YEAR, IN APRIL AND NOVEMBER

39 ACCORDING TO THE AOA COUNCIL CLUSTER AND IN JULY/AUGUST

40 ONE-WEEK PRIOR TO THE SUMMER COUNCIL CLUSTER. MEETING

41 DATES ARE PUBLISHED ANNUALLY IN THE PTRC AND BOE AGENDAS

42 AND ANNUALLY TO THE SPECIALTY AFFILIATES.

43

44 2. THE PTRC MAY AS NEEDED TAKE ACTION BY MAIL BALLOT ON THE

45 APPROVAL OF THE CHAIR.

1 A. THERE WILL BE REGULARLY SCHEDULED MAIL BALLOTS FOR
2 TRAINEE APPROVAL ACTIONS SCHEDULED BETWEEN MEETINGS
3 OF THE PTRC.

4
5 B. MAIL BALLOTS FOR PROGRAM ACTIONS WILL BE LIMITED TO
6 EXCEPTIONAL NEED. NO RECOMMENDATION FOR DENIAL OR
7 PROBATIONARY APPROVAL WILL BE CONDUCTED BY MAIL
8 BALLOT. THE PTRC WILL CONSIDER INSPECTION REPORTS AND
9 LENGTH OF CONTINUING APPROVALS ONLY AT REGULARLY
10 SCHEDULED MEETINGS.

11
12 E. EXECUTIVE COMMITTEE

13
14 THERE SHALL BE AN EXECUTIVE COMMITTEE CONSISTING OF THE CHAIR, THE
15 VICE CHAIR AND ONE OTHER MEMBER APPOINTED FROM THE ROSTER OF
16 PERMANENT REPRESENTATIVES.

- 17
18 1. MEETINGS OF THE EXECUTIVE COMMITTEE WILL BE CALLED BY THE
19 CHAIR AND MAY BE HELD BY TELECONFERENCE.
20
21 2. THE PURPOSE OF THE EXECUTIVE COMMITTEE IS TO ACT WHEN
22 MEETINGS OF THE ENTIRE PTRC ARE NOT POSSIBLE, AND WHEN
23 NEEDED TO TAKE TIMELY ACTIONS, INCLUDING:
24
25 A. CONSIDERATION OF INDIVIDUAL TRAINING ISSUES
26 B. CONSIDERATION OF DISCIPLINARY ACTIONS TOWARD
27 INDIVIDUAL PROGRAM OR TRAINING INSTITUTIONS
28 C. CONSIDERATION OF REQUESTS FOR AN OFF CYCLE PROGRAM
29 REVIEW
30 D. REVIEW OF REQUESTS FOR RECONSIDERATION
31 E. OTHER BUSINESS AS DEEMED URGENT AND NECESSARY BY THE
32 CHAIR
33
34 3. THE SECRETARY WILL TAKE MINUTES AND THESE WILL BE REPORTED
35 TO THE FULL COUNCIL.
36

37 F. OTHER COMMITTEES

38
39 THE PTRC MAY APPROVE WORKING GROUPS, OR TASK FORCES, FOR SPECIAL
40 PROJECTS OR ASSIGNMENTS. MINUTES OR REPORTS WILL BE PRESENTED TO
41 THE FULL PTRC.
42

43 G. GENERAL PROCEDURES OF THE PTRC

- 44
45 1. The PTRC operates on Robert's Rules of Order, newly revised.

1 2. B. CONTINUING APPROVAL PROGRAM ACTIONS

2
3 Continuing Approval Program actions of the PTRC shall indicate a specific number of years
4 prior to mandatory resurvey as part of the motion, based on the criteria outlined in its basic
5 documents. SPECIFIC DEFICIENCIES WILL BE CITED IN THE ACTION AND
6 REFERENCED IN THE PTRC ACTION LETTER.

- 7
8 1. FOLLOWING RE-INSPECTION, THE IEC OR SPECIALTY COLLEGE WILL
9 FILE A RECOMMENDATION FOR CONTINUING APPROVAL FOR PTRC
10 ACTION. CONTINUING APPROVAL WILL INCLUDE A TERM FOR RE-
11 INSPECTION OF ONE (1) TO FIVE (5) YEARS. PROGRAMS ARE REQUIRED
12 TO UNDERGO INSPECTION AT THE END OF EACH APPROVAL PERIOD. IN
13 ORDER FOR THE PROGRAM TO BE ELIGIBLE FOR REVIEW THERE MUST
14 BE AT LEAST ONE TRAINEE IN THE PROGRAM.

15
16 2. TERMS OF APPROVAL

17
18 A. APPROVAL WITH REINSPECTION FIVE (5) YEARS FROM THE DATE
19 OF PTRC ACTION: THIS ACTION IS RESERVED FOR EXCELLENT
20 PROGRAMS THAT MEET OR EXCEED AOA STANDARDS AND HAVE
21 NO MAJOR DEFICIENCIES. THESE ARE QUALITY PROGRAMS WITH
22 ESTABLISHED LEADERSHIP AND A HISTORY OF STABILITY.

23
24 B. APPROVAL WITH REINSPECTION FOUR (4) OR THREE (3) YEARS
25 FROM THE DATE OF PTRC ACTION: THIS ACTION IS BASED ON
26 THE PROGRAM INSPECTION, RECOMMENDATION OF THE
27 SPECIALTY COLLEGE, AND CONSIDERATION BY THE PTRC.

28
29 C. APPROVAL WITH REINSPECTION TWO (2) YEARS FROM THE DATE
30 OF PTRC ACTION: THIS ACTION IS TO BE USED FOR PROGRAMS
31 THAT MEET THE MAJORITY OF AOA STANDARDS BUT HAVE
32 DEFICIENCIES OR ARE IN A STATE OF TRANSITION WHICH MAY
33 AFFECT THE QUALITY OF TRAINING.

34
35 D. APPROVAL WITH REINSPECTION ONE (1) YEAR FROM THE DATE
36 OF PTRC ACTION WILL BE CONSIDERED A PROBATIONARY
37 APPROVAL.

38
39 C. PROBATIONARY APPROVALS

40
41 PROBATIONARY APPROVALS OF ONE YEAR, WITH OR WITHOUT THE ABILITY TO
42 RECRUIT, SHALL REFLECT REVIEW AND DELIBERATION BY THE PTRC WITH
43 EXPLICIT REASONS FOR THE PROBATIONARY ACTION.

- 44
45 1. THIS ACTION IS TO BE USED FOR PROGRAMS NOT IN COMPLIANCE
46 WITH ONE OR MORE MAJOR AOA STANDARDS WHICH MUST BE

1 CORRECTED. THERE IS NO ABILITY TO RECRUIT UNDER A
2 PROBATIONARY APPROVAL UNLESS PTRC SPECIFICALLY ALLOWS
3 RECRUITMENT.
4

- 5 2. ANY PROGRAM RECEIVING A PROBATIONARY ACTION WITHOUT THE
6 ABILITY TO RECRUIT WILL BE BLOCKED FROM PARTICIPATING IN ERAS
7 AND THE AOA MATCH UNLESS A REQUEST FOR APPEAL IS RECEIVED
8 AT AOA AND ACCEPTED.
9
- 10 3. DEFICIENCIES MUST BE SATISFACTORILY CORRECTED WITHIN 18
11 MONTHS OF THE CITATION DATE. FAILURE OF THE PROGRAM TO FILE
12 A CORRECTIVE ACTION PLAN OR TO FILE EVIDENCE OF
13 IMPLEMENTATION OF CORRECTIVE ACTIONS MAY RESULT IN
14 IMMEDIATE RE-INSPECTION OR DENIAL OF CONTINUING APPROVAL.
15
- 16 4. PROGRAMS ON PROBATIONARY CONTINUING APPROVAL ARE NOT
17 ELIGIBLE TO APPLY FOR INCREASES IN POSITIONS.
18
- 19 5. PROGRAMS ON PROBATIONARY CONTINUING APPROVAL FOR TWO
20 CONSECUTIVE TERMS SHALL BE TERMINATED EFFECTIVE JUNE 30 OF
21 THE SECOND YEAR. ANY SUCH TERMINATED PROGRAM MAY REAPPLY
22 FOR APPROVAL AS A NEW PROGRAM ONE YEAR AFTER THE DATE OF
23 TERMINATION.
24

25 26 D. DENIAL ACTIONS 27

28 PTRC ACTION OF DENIAL INDICATES MAJOR DEFICIENCIES IN THE PROGRAM
29 RECOMMENDED FOR ACTION. DENIAL OF APPROVAL OF ANY AGENDA ITEM
30 SHALL REFLECT REVIEW AND DELIBERATION BY THE PTRC WITH EXPLICIT
31 REASONS FOR DENIAL INCLUDED AS PART OF SUCH ACTIONS.
32

- 33 1. DENIAL OF CONTINUING APPROVAL INDICATES THAT THE PROGRAM
34 HAS VIOLATED ONE OR MORE MAJOR REQUIREMENTS MAKING IT
35 NECESSARY TO TERMINATE THE EXISTING PROGRAM. DENIAL
36 ACTIONS MAY BE TAKEN FOR PROGRAMS ON PROBATIONARY
37 APPROVAL THAT HAVE NOT FILED CORRECTIVE ACTIONS.
38
- 39 2. DENIAL OF NEW PROGRAM APPROVAL INDICATES THE PRESENCE OF
40 DEFICIENCIES IDENTIFIED IN A PRE-APPROVAL INSPECTION OR IN
41 MATERIALS SUBMITTED IN THE APPLICATION PROCESS. DENIAL MAY
42 BE TAKEN WHERE LETTERS OF NEGATIVE IMPACT FROM AOA-
43 ACCREDITED SPONSORS IN THE MARKET AREA HAVE BEEN FILED WITH
44 THE SPECIALTY COLLEGE OR THE AOA.

- 1 3. DENIAL OF INCREASE APPLICATIONS INDICATES THE PROGRAM DOES
2 NOT HAVE THE FINANCIAL OR EDUCATION RESOURCES, INCLUDING
3 SCOPE, VOLUME AND VARIETY, TO SUPPORT ADDITIONAL TRAINEES.
4

5 E. TYPES OF INSPECTIONS
6

7 PROGRAMS WILL PARTICIPATE IN A FULL PROGRAM INSPECTION WITHIN THE
8 TERM ~~PROSCRIBED~~ PRESCRIBED BY THE PTRC, WHICH WILL ALSO HAVE
9 AUTHORITY TO REQUIRE ADDITIONAL REVIEWS (WITH OR WITHOUT
10 RECOMMENDATION OF THE SPECIALTY COLLEGE).
11

12 1. PRE-APPROVAL INSPECTION

13 THE IEC OR SPECIALTY COLLEGE MAY REQUIRE A PRE- APPROVAL
14 INSPECTION AT THEIR DISCRETION PIOR TO MAKING A
15 RECOMMENDATION FOR ACTION TO THE PTRC. SUCH INSPECTIONS DO
16 NOT REQUIRE PTRC APPROVAL BUT AOA WILL BE NOTIFIED.
17

18 2. FOCUSED SITE REVIEW

19 WHEN A PROGRAM IS DEFICIENT IN AN AREA THAT REQUIRES A SITE
20 VISIT TO VERIFY CORRECTION OF DEFICIENCIES PRIOR TO THE
21 PROGRAM'S NEXT REGULARLY SCHEDULED INSPECTION. NOTICE OF A
22 FOCUSED SITE REVIEW WILL INCLUDE AREAS OF CONCERN OR
23 DEFICIENCIES TO BE ADDRESSED. FOCUSED SITE REVIEWS WILL NOT
24 BE CONSIDERED AS FULL INSPECTIONS.
25

26 A. FILING OF A CORRECTIVE ACTION PLAN AND/OR EVIDENCE OF
27 IMPLEMENTATION OF THE ACTION PLAN CAN RESULT IN A
28 SPECIALTY COLLEGE RECOMMENDATION FOR WAIVER OF THE
29 FOCUSED SITE REVIEW.
30

31 3. MANDATORY CONSULT

32 WHEN A PROGRAM HAS DEFICIENCIES INDICATING PROGRAM
33 DEVELOPMENT ISSUES OR WHERE DEFICIENCIES INDICATE OUTSIDE
34 ASSISTANCE WOULD BE HELPFUL, A MANDATORY CONSULTATION
35 MAY BE REQUIRED. A CONSULT MAY ALSO BE REQUIRED FOR NEW
36 PROGRAMS WHERE NO PRE-APPROVAL INSPECTION HAS BEEN
37 CONDUCTED. A MANDATORY CONSULT WILL NOT BE CONSIDERED AS
38 FULL INSPECTIONS.
39

40 A. ANY PROGRAM OR TRAINING INSTITUTION MAY MAKE A
41 REQUEST FOR A CONSULTATION TO THE AOA OR THE SPECIALTY
42 COLLEGE. SUCH REQUESTS ARE VOLUNTARY AND DO NOT
43 REQUIRE PTRC APPROVAL.

1 4. OFF- CYCLE INSPECTION

2 OFF-CYCLE INSPECTIONS MAY BE CALLED FOR BY THE PTRC OUTSIDE
3 OF THE SCHEDULE REQUIRED IN THE MOST RECENT PTRC APPROVAL
4 ACCORDING TO THE OFF-CYCLE INSPECTION PROTOCOL (SEE
5 APPENDIX A). OFF-CYCLE INSPECTIONS MAY BE FOCUSED SITE VISITS,
6 MANDATORY CONSULTATIONS OR FULL INSPECTIONS.
7

8 5. REPORTS FROM INSPECTORS WILL BE DUE AT THE AOA WITHIN 15
9 DAYS OF THE INSPECTION OR WITHIN 15 DAYS OF THE LAST
10 INSPECTION WHERE AN INSPECTOR IS REVIEWING MULTIPLE
11 PROGRAMS. HONORARIA WILL NOT BE GIVEN FOR LATE INSPECTION
12 REPORTS.
13

14 6. INSTITUTIONAL SITE REVIEW

15 THE PTRC MAY CALL FOR AN INSTITUTIONAL REVIEW TO EVALUATE
16 PROBLEMS THAT MAY BE ENDEMIC TO THE INSTITUTION.
17

18 A) SUCH INSPECTIONS WILL BE CONDUCTED BY A TEAM OF
19 INDEPENDENT EVALUATORS WITH REPRESENTATIVES FROM COPTI,
20 PTRC, COPT AND OTHERS AS NEEDED. REPORTS WILL BE FILED
21 WITH PTRC PRIOR TO THEIR NEXT REGULAR MEETING.
22

23 B) COSTS FOR INSTITUTIONAL REVIEWS WILL BE BORNE BY THE
24 INSTITUTION.
25

26 IV. TRAINING APPROVAL PROCEDURES
27

28 A. Federal and ACGME/PGYI Internships
29

30 Approval indicates that the intern has successfully completed a program which meets the
31 criteria required for the equivalent of a rotating internship as stated in Section VI of the
32 Policies and Procedures for Intern Training, and, for non-federal internships, that the intern
33 has met the exceptions criteria for special consideration of internship training of Board of
34 Trustees resolution 65/M92 .

35 B. Residency/ACGME Training
36

37 The PTRC does not approve participation in ACGME residency programs. Rather,
38 applicants for ACGME training approval register with the AOA, but are evaluated for
39 program approval by their respective specialty college. The Program and Trainee Review
40 Committee only grants final approval of training complete status (see below).
41 Specialty College approval of *program* signifies that the resident's application is complete and
42 that the following information has been received (or is on file with the specialty college) and
43 will offer training which is compatible with current AOA standards and accepted by the
44 specialty college:

- 45 1. Statistical information is satisfactory
- 46 2. The program description is satisfactory
- 47 3. The program director is certified in the appropriate specialty.

1 The applicant will be notified of program approval status by the specialty college.
2 Annual approval of training by the specialty college indicates that the resident has submitted
3 the required report material, i.e., a resident's report, the program director's evaluation, and a
4 satisfactory scientific paper, if required by the specialty college, and the reports reflect
5 adequate scope, volume and variety of cases, and satisfactory completion of the year of
6 training in that program. The applicant will be notified of approval of that year of training
7 by the specialty college.

8 Approval of training complete status by the PTRC indicates that the resident has completed
9 all required reports and papers, that each year of training has been approved by the specialty
10 college, and the program director has noted the resident's satisfactory completion of training.

11 C. Federal and ACGME/PGYI Internships

12
13 Denial of approval indicates that the intern has failed to successfully complete the internship
14 or that the program lacked specific rotation(s) to meet the curriculum as stated in the
15 Policies and Procedures for Intern Training, or for non-federal internships, that the intern
16 has not met the exceptions criteria for special consideration of internship training of Board
17 of Trustees resolution. 65/M92 .

18 D. Residency/ACGME Training

19 Denial of approval of applications to participate in an ACGME *program* indicates that the
20 resident's program has (1) insufficient scope, volume, and variety to meet AOA required
21 minimum training standards in the area of training; (2) the program description indicates that
22 the program will not meet AOA minimum standards in the area of training, or (3) the
23 program director is not certified or otherwise qualified through special recognition in the
24 area of training.

25 Denial of approval of training indicates that the resident has submitted material, which does
26 not meet minimum standards for scope and volume for the level of training or has failed to
27 be passed onto the next level of training by his/her program director. (*Scientific papers that are*
28 *poorly written or are in some way unacceptable may be a cause for deferral and not denial*)

29 E. Internships or Residencies

30 Physicians who have unilaterally broken any intern and/or residency contract with any
31 osteopathic training program to participate in a non-osteopathic program will be denied
32 access to the approval progress for ACGME training programs. (B7/91)

33
34 V. Agenda Preparation AND PROCEDURE

35
36 A. Specialty College EVALUATING COMMITTEES (SPEC) shall hold their evaluating
37 committee meetings AT LEAST 45 DAYS PRIOR TO PUBLISHED PTRC MEETING
38 DATES so that reports are received by the Division of Postdoctoral Training at least ~~forty~~
39 ~~(40)~~ THIRTY (30) days prior to the scheduled PTRC meetings.

40
41 1. SPECIALTY COLLEGE EVALUATING COMMITTEES (SPEC)
42 WILL MEET IN PERSON OR BY TELECONFERENCE THREE (3) TIMES A
43 YEAR, GENERALLY IN FEBRUARY, MAY AND SEPTEMBER.

44
45 B. SPEC REPORTS TO THE PTRC ON INSPECTIONS WILL FOLLOW THE
46 SCHEDULE BELOW WHEREVER POSSIBLE:

- 1 1. FEBRUARY - APRIL INSPECTIONS WILL BE REVIEWED AT THE MAY SPEC
- 2 AND REPORTED TO PTRC FOR THE JULY MEETING.
- 3 2. MAY - AUGUST INSPECTIONS WILL BE REVIEWED AT THE SEPTEMBER
- 4 SPEC AND REPORTED TO THE PTRC FOR THE NOVEMBER MEETING.
- 5 3. SEPTEMBER - JANUARY INSPECTIONS WILL BE REVIEWED AT THE
- 6 FEBRUARY SPEC AND REPORTED TO THE PTRC FOR THE APRIL
- 7 MEETING.

8
9 C. WHEN THE SPEC MUST DEFER RECOMMENDATION ON A PROGRAM
10 ACTION, THE SPEC WILL REPORT THE DELAY TO THE AOA DIVISION OF
11 POSTDOCTORAL TRAINING WITH THE EXPECTED DATE OF REPORT.

12
13 ~~2.~~ D. Specialty colleges shall submit OFFICIAL RESOLUTIONS ~~two (2) master hard copies~~
14 ~~(single spaced, one-sided) and one (1) electronic copy (disk)~~ to the AOA DIVISION OF
15 POSTDOCTORAL TRAINING ~~secretary of the PTRC~~ FOLLOWING THE
16 DIRECTIVES OF THE *GUIDELINES FOR SUBMITTING RESOLUTIONS FOR THE*
17 *PROGRAM AND TRAINEE REVIEW COUNCIL (PTRC) AND THE COUNCIL ON*
18 *POSTDOCTORAL TRAINING (COPT)*

19
20 1. WHEN THE SPECIALTY COLLEGE DOES NOT FOLLOW GUIDELINES OR
21 USE THE TEMPLATE FORMS PROVIDED, THE PTRC SECRETARY MAY
22 RETURN THOSE RESOLUTIONS TO THE SPECIALTY COLLEGE FOR
23 CORRECTION OR FOR SUBMISSION TO THE NEXT REGULARLY
24 SCHEDULED MEETING OF THE PTRC.

25
26 2. GUIDELINES WILL BE UPDATED NO MORE THAN ANNUALLY PRIOR TO
27 THE FALL MEETING OF THE PTRC, AND WILL BE PUBLISHED TO DO
28 ONLINE AND TRANSMITTED TO THE SPEC ELECTRONICALLY.

29
30 3. ELECTRONIC SUBMISSIONS ARE REQUIRED. E-MAIL RESOLUTUIONS
31 WILL REQUIRE PRIOR APPROVAL.

32
33 ~~2.~~ E. All agenda items received after THE PUBLISHED SUBMISSION DEADLINE that time
34 shall be reviewed by the PTRC as appropriate at their next scheduled meeting. Only the
35 Chairman and/or Secretary may authorize exceptions to the above.

36
37 ~~3.~~ F. DISTRIBUTION OF AGENDAS

38
39 1. THE SECRETARY WILL SEND ~~Members shall be sent~~ an advanced copy of the
40 agenda TO MEMBERS (VOTING AND NON-VOTING) for review approximately
41 two weeks prior to the PTRC meeting DATE. This advanced agenda shall contain
42 minutes of previous committee meetings, reports, policy items and issues requiring
43 advanced review, as determined by the chairman.

44
45 2. COPIES OF THE PTRC AGENDA DISTRIBUTED TO THE SPECIALTY
46 AFFILIATES AND GUESTS WILL BE APPROPRIATELY ABRIDGED FOR

1 PURPOSES OF CONFIDENTIALITY AND WILL BE DISTRIBUTED
2 ELECTRONICALLY.

3
4 A. IF A SPECIALTY AFFILIATE HAS BUSINESS BEFORE THE PTRC A
5 REPRESENTATIVE OF THE SPECIALTY AFFILIATE SHOULD BE
6 PRESENT OR AVAILABLE BY PHONE.
7

8
9 ~~D.~~ VI Reconsideration and Appeal of Decisions

10
11 AS PTRC ACTIONS ARE FINAL, PROGRAMS OR INDIVIDUAL TRAINEES MAY
12 REQUEST THAT PTRC RECONSIDER SUCH ACTION UNDER THE FOLLOWING
13 CIRCUMSTANCES AND WITHOUT FILING A FORMAL APPEAL. THE CHAIR WILL BE
14 NOTIFIED OF ALL REQUESTS FOR RECONSIDERATION UPON RECEIPT AT AOA. A
15 REQUEST FOR RECONSIDERATION WILL NOT RESULT IN A STAY OF THE PTRC
16 ACTION.
17

18 A. A REQUEST FOR RECONSIDERATION MUST BE BASED ONLY ON ERRORS IN
19 FACT. QUESTIONS REGARDING FAIRNESS OF APPLICATION OF
20 STANDARDS OR POLICY REQUIRE AN APPLICATION TO THE BOE APPEALS
21 COMMITTEE (SEE G BELOW)
22

23 ~~a. B. If action on a program or an individual request is deferred~~ IF A PROGRAM OR
24 INDIVIDUAL TRAINEE BELIEVES THAT AN ACTION TAKEN IS due to
25 inaccurate information(ERRORS IN FACT) ~~or a continuing program receives a~~
26 ~~recommendation of approval with re-inspection within one year~~, and said program or
27 physician wishes to have the ~~recommendation~~ ACTION reconsidered, a written request
28 MUST BE FILED WITH THE AOA DIVISION OF POSTDOCTORAL TRAINING
29 describing the basis for reconsideration ~~must be submitted to the Division of Postdoctoral~~
30 ~~Training~~ AND documenting the changes or discrepancies between reported deficiencies
31 and fact. This request must be received within forty (40) days of the date of the letter of
32 notification.
33

34 C. IF AFTER INSPECTION a continuing program receives a recommendation of
35 approval with re-inspection within one year, WITH OR WITHOUT THE
36 ABILITY TO RECRUIT, THE PROGRAM MAY REQUEST A
37 RECONSIDERATION BY THE PTRC WITH DOCUMENTATION TO
38 REFUTE THE REASONS FOR THE PROBATIONARY ACTION. THIS
39 REQUEST MUST BE RECEIVED WITHIN FORTY (40) DAYS OF THE
40 DATE OF THE LETTER OF NOTIFICATION.
41

42 D. UPON RECEIPT OF THE WRITTEN REQUEST FROM AN INDIVIDUAL
43 TRAINEE, the Division of Postdoctoral Training shall forward this
44 documentation to THE EXECUTIVE COMMITTEE ~~selected members~~ of the
45 PTRC for input. This input shall then be reported to the full PTRC

1 ~~e. — A formal ballot shall be prepared for PTRC action within five (5) working days of~~
2 ~~receipt of the recommendation from the specialty college.~~

3
4 E. UPON RECEIPT OF A WRITTEN REQUEST FOR RECONSIDERATION ON A
5 PROGRAM ACTION STAFF WILL FORWARD A COPY OF THE REQUEST TO
6 THE CHAIR OF THE SPECIALTY AFFILIATE EVALUATING COMMITTEE FOR
7 REVIEW WITH A REPORT TO THE CHAIR WITHIN THIRTY (30) DAYS.

8
9 1. UPON RECEIPT OF THE REPORT THE PTRC CHAIR MAY CALL A MEETING
10 OF THE EXECUTIVE COMMITTEE OR REFER THE RECONSIDERATION TO
11 THE NEXT REGULARLY SCHEDULED MEETING OF THE PTRC.

12
13 ~~d. F.~~ All actions on ~~reconsidered issues~~ RECONSIDERATIONS shall be reported to the full
14 ~~COPT~~ PTRC in the Secretary's Report FOR THE NEXT REGULARLY SCHEDULED
15 MEETING.

16
17 2. G. ~~Denial of Approval~~ FORMAL APPEAL OF PTRC ACTION

18
19 1. ~~a.~~ ANY ACTION OF THE PTRC MAY BE APPEALED TO THE BOE APPEAL
20 COMMITTEE. NOTIFICATIONS OF PTRC ACTIONS FROM THE AOA WILL
21 INCLUDE APPEAL PROCEDURES FOR ALL DENIALS AND FOR ALL
22 PROBATIONARY ACTIONS. ~~An institution or individual notified by the PTRC~~
23 ~~Secretary of a recommendation of denial may request an appeal to the BOE Appeal~~
24 ~~Committee~~

25
26 2. ~~b.~~ A request for an appeal shall be made in writing within thirty (30) days of receipt
27 of the letter of notification and must state the basis for the appeal ACCORDING TO
28 THE PROCESS OUTLINED IN THE HANDBOOK OF THE BUREAU OF
29 OSTEOPATHIC EDUCATION (BOE), APPENDICES A AND B.

30
31 3. ~~c.~~ If an appeal is granted, the BOE Appeal Committee shall schedule a hearing at its
32 next meeting in accordance with its appeal protocol ~~(See Appendix B).~~

33
34 3. ~~Overturning of Specialty College Recommendations~~

35
36 ~~a. — When the PTRC overturns a recommendation of a specialty college, the specialty college~~
37 ~~will receive written notification of the decision, including a detailed explanation of the reasons~~
38 ~~for the decision.~~

39
40 E. ~~Advisors~~

41
42 ~~The AOA president, president elect, executive director, chair of the Department of Educational~~
43 ~~Affairs, and vice-chair of the Department of Educational Affairs meet with the PTRC as non-~~
44 ~~voting advisors on policies and procedures of the AOA as applicable to the PTRC.~~

1 F. ~~Observers~~

2
3 1. ~~By precedence, all meetings of the AOA PTRC are open to the public.~~

4
5 2. ~~Observers include, but are not limited to, representatives of state and federal accrediting~~
6 ~~regulatory bodies. The presence of observers shall be acknowledged by the chairman, and~~
7 ~~recorded in the COPT minutes.~~

8
9
10 G. VII. Conflict Of Interest Policy

11
12 The following is an adaptation of a conflict of interest policy adopted by the AOA Board in
13 October 1997 for the then Bureau of Professional Education.

14
15 This policy statement governs matters of conflicts of interest and appearances of impropriety as
16 they may occur in the respective evaluations, deliberations, recommendations, and actions of the
17 ~~Bureau of Osteopathic Education (BOE)~~ and its subordinated Councils. These policies are
18 applicable to members of the AOA Board, the BOE and its subordinated councils, and also to
19 members of the administrative staff, appeals panels and evaluation teams, and to consultants.

20
21 It is intended that these policies establish a mechanism whereby all individuals make known
22 situations of clear conflict and also those that may give rise to the appearance of impropriety.
23 The goal is to make sure that discussions and actions are participated in only by those who have
24 no conflict and, to the extent possible, that such discussions and actions avoid the appearance of
25 conflicts.

26
27 It is stated that elected officers and trustees of the AOA cannot serve on the Bureau and Council.
28 However, there is the further question of whether such individuals should be free to participate in
29 discussions of matters such as accreditation. As an accreditation agency recognized by the U.S.
30 Secretary of Education for both institutional and programmatic purposes, the AOA Bureau must
31 exclude members of the AOA Board of Trustees from decision making in both of the areas of
32 accreditation action and accreditation policy of colleges of osteopathic medicine.

33
34 The chair of the PTRC will be able to direct an AOA board member to exclude himself/herself
35 from specific discussions in which a conflict may exist. If there is any question of undue
36 influence arising from anything but purely disinterested motives, then discussion should simply
37 be limited to members of the respective bodies.

38
39 Matters such as decisions on accreditation status of an ~~Osteopathic Postdoctoral Training~~
40 ~~Institution (OPTI)~~ AOA-APPROVED POSTDOCTORAL TRAINING PROGRAM and the
41 particular findings leading to such status can have an enormous impact on institutions, so there
42 should be no reluctance to employ executive session whenever a chair feels that discussion may
43 involve sensitive matters. Executive sessions of the AOA BOE PTRC shall be limited to voting
44 members of the PTRC, the AOA Executive Director, Secretary to the Bureau COUNCIL, and by
45 invitation, to those participants deemed appropriate to the discussion.

1 Individuals asked to serve on the PTRC and its councils and other bodies will honestly examine
2 their individual circumstances and determine whether they can render fair and unbiased service
3 in general. Before the body sits down to serve, all of the members must have gone through this
4 self-examination. This is also true for staff and team and panel members. Full disclosure of any
5 doubtful situation to the other members of the body must be made. This is particularly true of
6 situations where the individual may honestly feel that he or she can be fair, but the situation
7 gives rise to, or may give rise to, an appearance of impropriety.

8
9 The decision to withdraw from discussions and/or not to vote should initially come from the
10 individual, but the final decision must come from the chair or the majority of the other members.
11 If the chair rules, such ruling should be subject to a call for a vote by other members. The chair
12 may feel that he or she should not substitute his or her judgment for that of a majority and may
13 want to call for a vote at the outset. It may be that one member may bring to the attention of the
14 body a possible conflict situation involving another member. Needless to say, this can give rise
15 to a certain amount of acrimony in some cases. Consequently, each member should keep in
16 mind that he or she should disclose his own possible conflict, so as not to put that sort of burden
17 on a fellow member. It may be that the very presence of a member with a conflict would inhibit
18 the discussions and actions of a body, so it is not unwarranted to ask a member to absent himself
19 or herself from the deliberations in some circumstances. In some cases it may not be clear as to
20 what particular body should be informed and make rulings. In case of doubt, matters should be
21 brought to the Bureau.

22
23 It is often difficult to define matters involving conflicts. Clearly, a financial interest creates a
24 conflict. However, some financial interests are indirect and it is here that a member must search
25 his or her conscience, because such interest may not appear to the others. Anyone serving on a
26 board or committee brings to the body the sum total of his or her experience and personal
27 opinions. The key question is whether a particular opinion or belief can stand in the way of
28 rendering a fair and unbiased discussion or decision based on the facts and the rules. This may be
29 a highly subjective determination and it underscores that individuals should be required to make
30 disclosure to the other members whenever there is a question.

31
32 In the accreditation area, examples of situations, which may or may not create conflicts are:

- 33
34 A. Being an alumnus or alumna of an OPTI under consideration;
35
36 B. Being an employee or board member of the OPTI (this would most likely create a
37 conflict)
38
39 C. Being involved with a competitor of the OPTI (competition is often difficult to
40 ascertain -- there is a question of direct or remote competition);
41
42 D. Having a family or business relationship with others affiliated with the OPTI under
43 consideration.

44
45 This is not an inclusive list, but is intended to give some guidance.

1 It should be kept in mind that the integrity of the respective body is always at risk, so that each
2 member should be constantly aware of creating an appearance of improper conduct even where
3 there may not be such in fact. Connections with affected individuals and institutions cannot
4 always be avoided. Such connections often bring a measure of experience and expertise to the
5 process. However, when such connections exist, it is prudent to err on the side of greater caution
6 and make full disclosure.
7

1
2 ~~COUNCIL ON POSTDOCTORAL TRAINING,~~
3 ~~ITS COUNCILS AND~~
4 ~~APPEALS PROCESSES OF ITS COUNCILS~~

5
6

7 The following charts are under development:

8

9 Chart 1: ~~Flow Chart of Councils~~

10 Chart 2: ~~Appeal Process by Level of Review—Individual's Internships~~

11 Chart 3: ~~Appeal Process by Level of Review—Individual's Residency~~

12 Chart 4: ~~Osteopathic Postdoctoral Training Institutions (OPTI)~~

13 Chart 5: ~~Internship Program~~

14 Chart 6: ~~Residency Program~~

APPENDIX A

OFF-CYCLE INSPECTION PROCEDURE FOR OSTEOPATHIC INTERNSHIP AND
RESIDENCY PROGRAMS
AOA DIVISION OF POSTDOCTORAL TRAINING

1 POSTDOCTORAL TRAINING PROGRAMS ARE INSPECTED IN CYCLES DRIVEN BY
2 PTRC-GRANTED APPROVAL AS DESCRIBED IN THE AOA BASIC DOCUMENT (SEC.
3 III, 3.9-3.40). THE PTRC HAS THE AUTHORITY TO CALL FOR INSPECTIONS OUTSIDE
4 OF THIS CYCLE WHEN IT IS NECESSARY TO PRESERVE THE QUALITY OF
5 TRAINING FOR AN INDIVIDUAL PROGRAM OR TRAINING INSTITUTION, AND MAY
6 ALSO CONSIDER REQUESTS FOR OFF-CYCLE SITE VISITS BY A SPECIALTY
7 COLLEGE, OPTI OR OTHER STAKEHOLDER IN THE TRAINING OF OSTEOPATHIC
8 PHYSICIANS.

9
10 REQUESTS FOR AN OFF-CYCLE SITE REVIEW SHALL BE SUBMITTED TO THE CHAIR
11 OF THE PTRC WITH SUPPORTING DOCUMENTATION FROM ANY OF THE
12 FOLLOWING SOURCES:

- 13
- 14 • DME, PROGRAM DIRECTOR AND OR THE ATTENDING OF THE PROGRAM
- 15 FOR WHICH A SITE REVIEW IS REQUESTED;
- 16 • ADMINISTRATOR OF THE OPTI PARTNER OF THE TRAINING PROGRAM
- 17 INSTITUTION;
- 18 • ADMINISTRATOR, FACULTY OR OTHER STAFF IN A LEADERSHIP POSITION
- 19 EMPLOYED BY THE OPTI PARTNER COLLEGE OF OSTEOPATHIC;
- 20 • SPECIALTY COLLEGE OF THE SPECIALTY ASSOCIATED WITH THE
- 21 PROGRAM TO BE REVIEWED;
- 22 • TWO OR MORE TRAINEES AT THE PROGRAM TO BE REVIEWED.
- 23

24 CARE SHALL BE TAKEN THAT REQUESTS FOR OFF-CYCLE SITE REVIEWS WILL BE
25 BASED ON VERIFIABLE DATA, AND WILL NOT BE BASED ON UNSUPPORTED
26 NARRATIVE OR VERBAL REPORTS. THE CHAIR WILL NOTIFY THE OPTI AND/OR
27 SPECIALTY COLLEGE AT APPROPRIATE POINTS IN PROCESS, AND WHEN ANY
28 INTERVENTION IS REQUIRED. AOA STAFF WILL MAINTAIN A FILE FOR
29 DOCUMENTATION AND WILL SUPPORT THE PTRC OR OPTI IN IMPLEMENTATION
30 OF INVESTIGATION OF COMPLAINTS OR CORRECTIVE ACTIONS.

31
32 IF AFTER DOCUMENT REVIEW THE CHAIR OF THE PTRC DETERMINES THAT
33 DOCUMENTATION SHOWS SUFFICIENT EVIDENCE THAT DEFICIENCIES EXIST
34 THAT THREATEN THE COMPLETION OF THE TRAINING PROGRAM IN
35 COMPLIANCE WITH THE BASIC DOCUMENT OR BASIC STANDARDS, THE CHAIR
36 MAY TAKE ANY OF THE FOLLOWING ACTIONS. THE INTENT OF THE ACTION
37 WILL BE TO INVESTIGATE AND ASSIST THE PROGRAM IN RESOLVING AN
38 EXISTING PROBLEM AS NEEDED, WHILE ALSO RESERVING THE AUTHORITY TO
39 CALL AN INSPECTION WHERE REQUIRED. THE CHAIR MAY:

- 1 • REQUEST AN INVESTIGATION BY THE OPTI WITH A WRITTEN REPORT TO
2 THE CHAIR OF THE PTRC WITHIN THIRTY (30) DAYS;
- 3 • REQUEST ADDITIONAL INFORMATION FROM THE PROGRAM, THE
4 SPECIALTY COLLEGE, THE OPTI, OR OTHER APPROPRIATE BODIES;
- 5 • NOTIFY THE PROGRAM DIRECTOR OR DME THAT DOCUMENTATION HAS
6 BEEN PRESENTED THAT THE PROGRAM IS IN VIOLATION OF THE AOA
7 BASIC DOCUMENT AND/OR BASIC STANDARDS OF THE SPECIALTY AND
8 REQUEST AN INTERIM REPORT WITHIN TEN (10) DAYS AND A FINAL
9 REPORT WITHIN THIRTY (30) DAYS;
- 10 • REFER THE REQUEST FOR AN OFF-CYCLE SITE REVIEW TO THE EXECUTIVE
11 COMMITTEE OR FULL MEMBERSHIP OF THE PTRC FOR CONSIDERATION
12 AND CONSULTATION WITHIN 10 DAYS.

13
14 IN THE EVENT THAT THE ABOVE ACTIONS DO NOT ANSWER THE CONCERNS
15 ADDRESSED TO THE PTRC, OR THAT DOCUMENTATION CLEARLY SUPPORTS THE
16 NEED FOR AN ON-SITE INSPECTION, THE PTRC WILL NOTIFY THE PROGRAM BY
17 CERTIFIED MAIL THAT AN OFF-CYCLE SITE REVIEW IS CALLED FOR CAUSE AND
18 IS TO TAKE PLACE WITHIN SIXTY (60) DAYS, OR SOONER FOR EGREGIOUS CAUSE.
19 AUTHORIZATION OF ANY OFF-CYCLE INSPECTION WILL ALSO REQUIRE
20 IMMEDIATE NOTIFICATION TO THE SPECIALTY COLLEGE AND THE OPTI, WITH A
21 REPORT TO THE COPT AND COPTI NO LATER THAN THEIR NEXT SCHEDULED
22 MEETING.