## Table of Contents

<table>
<thead>
<tr>
<th>Overview</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Midwestern University/Osteopathic Postdoctoral Training Institution (MWU/OPTI)</td>
<td>4</td>
</tr>
<tr>
<td>Mission, Goals, and Objectives</td>
<td>5</td>
</tr>
<tr>
<td>OPTI Accreditation Standards</td>
<td>6-10</td>
</tr>
<tr>
<td>Index by Standard</td>
<td>11</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Policy Name</th>
<th>Policy Number</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. Prerequisites for Accreditation Policies and Procedures</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Approved Training Programs Policy</td>
<td>A-01</td>
<td>13</td>
</tr>
<tr>
<td>Bylaws Policy</td>
<td>A-02</td>
<td>14-15</td>
</tr>
<tr>
<td>Member Institution AOA Certification Policy</td>
<td>A-03</td>
<td>16</td>
</tr>
<tr>
<td>Membership Policy</td>
<td>A-04</td>
<td>17-18</td>
</tr>
<tr>
<td>Organization Policy</td>
<td>A-05</td>
<td>19</td>
</tr>
<tr>
<td><strong>B. Organization, Governance, and Finance Policies and Procedures</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Affiliation Agreements Policy</td>
<td>B-01</td>
<td>21</td>
</tr>
<tr>
<td>Annual Report Policy</td>
<td>B-02</td>
<td>22</td>
</tr>
<tr>
<td>Certificate of Completion Policy</td>
<td>B-03</td>
<td>23</td>
</tr>
<tr>
<td>Confidentiality of Records Policy</td>
<td>B-04</td>
<td>24</td>
</tr>
<tr>
<td>Conflict of Interest Policy</td>
<td>B-05</td>
<td>25</td>
</tr>
<tr>
<td>Financial Plan and Budget Policy</td>
<td>B-06</td>
<td>26</td>
</tr>
<tr>
<td>Financial Resources Policy</td>
<td>B-07</td>
<td>27</td>
</tr>
<tr>
<td>Governing Board Membership Policy</td>
<td>B-08</td>
<td>28-29</td>
</tr>
<tr>
<td>Governing Board Policies</td>
<td>B-09</td>
<td>30-31</td>
</tr>
<tr>
<td>Mission, Goals, and Objectives Policy</td>
<td>B-10</td>
<td>32</td>
</tr>
<tr>
<td>Program Catalog Publication Policy</td>
<td>B-11</td>
<td>33</td>
</tr>
<tr>
<td>Sponsorship Policy</td>
<td>B-12</td>
<td>34</td>
</tr>
<tr>
<td>Strategic Planning Policy</td>
<td>B-13</td>
<td>35</td>
</tr>
<tr>
<td>Supervision of the Educational Program Policy</td>
<td>B-14</td>
<td>36</td>
</tr>
<tr>
<td>Communications Policy</td>
<td>B-15</td>
<td>37</td>
</tr>
</tbody>
</table>
# C. Program Evaluation Policies and Procedures

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Policy Number</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accreditation Standards Policy</td>
<td>C-01</td>
<td>39</td>
</tr>
<tr>
<td>OGMEC Corrective Action Plan Policy</td>
<td>C-02</td>
<td>40</td>
</tr>
<tr>
<td>OGMEC Membership and Meeting Frequency Policy</td>
<td>C-03</td>
<td>41</td>
</tr>
<tr>
<td>OGMEC Responsibility Policy</td>
<td>C-04</td>
<td>42-44</td>
</tr>
<tr>
<td>Policy Implementation, Review, and Revision Policy</td>
<td>C-05</td>
<td>45</td>
</tr>
<tr>
<td>Program Evaluation Policy</td>
<td>C-06</td>
<td>46</td>
</tr>
</tbody>
</table>

# D. Research Policies and Procedures

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Policy Number</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>MWU/OPTI Research Policies</td>
<td>D-01</td>
<td>48-50</td>
</tr>
<tr>
<td>Publications Policy</td>
<td>D-02</td>
<td>51</td>
</tr>
<tr>
<td>Recognition of Trainee Research Activities Policy</td>
<td>D-03</td>
<td>52</td>
</tr>
<tr>
<td>Research Education and Resource Assistance Policy</td>
<td>D-04</td>
<td>53</td>
</tr>
<tr>
<td>Research Funding Assistance Policy</td>
<td>D-05</td>
<td>54</td>
</tr>
</tbody>
</table>

# E. Faculty and Instruction Policies and Procedures

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Policy Number</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faculty and Administrative Personnel Nondiscrimination Policy</td>
<td>E-01</td>
<td>56</td>
</tr>
<tr>
<td>Faculty Appointments Policy</td>
<td>E-02</td>
<td>57</td>
</tr>
<tr>
<td>Faculty Development Policy</td>
<td>E-03</td>
<td>58</td>
</tr>
<tr>
<td>Faculty Evaluation Policy</td>
<td>E-04</td>
<td>59</td>
</tr>
<tr>
<td>Integration of Osteopathic Principles and Practice Policy</td>
<td>E-05</td>
<td>60</td>
</tr>
</tbody>
</table>

# F. Intern and Resident Status and Services Policies and Procedures

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Policy Number</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>OGMEC Participation from Trainee Representatives Policy</td>
<td>F-01</td>
<td>62</td>
</tr>
<tr>
<td>Trainee Selection and Transfer Policy</td>
<td>F-02</td>
<td>63</td>
</tr>
<tr>
<td>Trainee Evaluation Policy</td>
<td>F-03</td>
<td>64</td>
</tr>
<tr>
<td>Work Hour Compliance Policy</td>
<td>F-04</td>
<td>65</td>
</tr>
</tbody>
</table>

# G. Curriculum Policies and Procedures

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Policy Number</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Program Development Policy</td>
<td>G-01</td>
<td>67-68</td>
</tr>
<tr>
<td>OGMEC Core Competency Compliance Policy</td>
<td>G-02</td>
<td>69</td>
</tr>
<tr>
<td>OGMEC Curriculum Review Policy</td>
<td>G-03</td>
<td>70</td>
</tr>
<tr>
<td>OGMEC Internal Review Policy</td>
<td>G-04</td>
<td>71</td>
</tr>
<tr>
<td>Program Accreditation Assistance Policy</td>
<td>G-05</td>
<td>72</td>
</tr>
<tr>
<td>Training Sites Not Owned or Operated by the MWU/OPTI Policy</td>
<td>G-06</td>
<td>73</td>
</tr>
<tr>
<td>H. Facilities Policies and Procedures</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Library Policy</td>
<td>H-01</td>
<td>75</td>
</tr>
<tr>
<td>Provision of Learning Resources Policy</td>
<td>H-02</td>
<td>76</td>
</tr>
</tbody>
</table>
Overview

MIDWESTERN UNIVERSITY/OSTEOPATHIC POSTDOCTORAL TRAINING INSTITUTION (MWU/OPTI)

The Midwestern University/Osteopathic Postdoctoral Training Institution (MWU/OPTI) was formed in 1998 to meet American Osteopathic Organization’s Council on Osteopathic Postdoctoral Training Institutions (COPTI) accreditation standards for osteopathic graduate medical consortia. COPTI accreditation provides the public, appropriate governmental jurisdictions, the osteopathic medical profession, and trainee assurance that accredited OPTIs have met or exceeded basic established levels of quality for postdoctoral education in osteopathic medicine. The MWU/OPTI is fully accredited by COPTI. Its most recent accreditation action was in August 2008, when continuing accreditation was granted with a resurvey scheduled for 2010.

The site visit team listed 16 citations related to the governance and operation of the MWU/OPTI. The MWU/OPTI’s concern about the citations prompted several major actions to correct these deficiencies.

The site team also recommended that the MWU/OPTI revise its operational policies to meet the intent of the AOA’s OPTI program: “Autonomous oversight of the educational programs in a structure that requires equal participation and responsibility by all member institutions is the expectation.”

The Chair of the MWU/OPTI Governing Board appointed a newly formed Accreditation Committee to review the governance structure and operation of the MWU/OPTI and to implement changes where needed to remedy deficiencies. This Self-Study Report describes these modifications and plans for future enhancements. The goal of the MWU/OPTI is achieve and remain in full compliance with the letter and intent of all OPTI Standards for Accreditation.
MISSION

The Midwestern University/Osteopathic Postdoctoral Training Institution shall be a national leader in providing osteopathic graduate medical education through Participating Partnerships with health care providers. The MWU/OPTI fosters a commitment to the osteopathic philosophy, provides integration of preclinical training for third and fourth year medical students, and offers opportunities for scientific research through stringent educational and administrative standards.

GOALS AND OBJECTIVES

- Be a national leader in providing osteopathic graduate medical education
- Foster a commitment to the osteopathic philosophy
- Provide integration of preclinical training
- Offer opportunities for scientific research
**A. Prerequisites for Accreditation**

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>OPTIs shall be composed of member hospitals that are all accredited by one of the following: JCAHO, BHFA, or equivalent healthcare accrediting entity. In addition, each OPTI membership shall include at least one COM accredited by the Commission on Osteopathic College Accreditation.</td>
</tr>
<tr>
<td>9.2</td>
<td>OPTI shall be a formally organized entity.</td>
</tr>
<tr>
<td>9.3</td>
<td>If OPTIs incorporate other health care facilities and organizations such as community health centers, ambulatory facilities, managed care organizations, school health clinics, federal health centers, and rural health clinics, then affiliation agreements shall be formally documented.</td>
</tr>
<tr>
<td>9.4</td>
<td>OPTIs shall be organized so that their governance permits the free association of its member COMs and hospitals with other AOA-approved educational consortia, institutions, or OPTIs.</td>
</tr>
<tr>
<td>9.5</td>
<td>Each OPTI shall offer a minimum of one AOA approved OGME-1 program and two AOA approved residency programs, at least one of which shall be in primary care (family medicine, general internal medicine, obstetrics and gynecology, or general pediatrics).</td>
</tr>
<tr>
<td>9.6</td>
<td>An OPTI may NOT sponsor AOA approved programs. Only provisionally or fully BHFA- or COCA-accredited institutions may sponsor AOA approved programs.</td>
</tr>
<tr>
<td>9.7</td>
<td>Each OPTI shall include opportunities for osteopathic student clerkship experiences.</td>
</tr>
<tr>
<td>9.8</td>
<td>Each OPTI member shall complete and maintain affiliation agreements with those institutions and training sites outside the OPTI which provide educational opportunities in accordance with Federal, state, and local regulations.</td>
</tr>
<tr>
<td>9.9</td>
<td>An institution that participates in an OPTI shall provide that OPTI with documentation it recognizes and accepts the certifying boards of the AOA as specialty Board certification on an equal basis with those certifying boards recognized by the American Board of Medical Specialties for the purposes of obtaining hospital privileges.</td>
</tr>
<tr>
<td>9.10</td>
<td>All OPTIs, developing OPTIs, or groups interested in organizing an OPTI, must comply with and observe the standards in this document, as well as the policies and procedures as stipulated in the OPTI Accreditation Handbook.</td>
</tr>
</tbody>
</table>

**B. Organization, Governance, and Finance Standards**

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>The OPTI shall define its mission, goals, and objectives and document in its self studies and annual reports how its activities support them.</td>
</tr>
<tr>
<td>9.2</td>
<td>The governing body of the OPTI shall adopt bylaws, or equivalent documents that shall define the responsibilities of the governing body, the administration, the postdoctoral faculty, and other significant constituencies, and set forth the organizational structure of the OPTI.</td>
</tr>
</tbody>
</table>
| 9.3          | Representation on the OPTI governing body shall be made available to each participates/member institution and shall be clearly defined in the OPTI bylaws or
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.4</td>
<td>The OPTI’s bylaws shall require any partner institution to notify the OPTI central site office of any substantive change that partner has made. The OPTI’s bylaws shall require the OPTI central site office to notify the AOA and the appropriate specialty college of any substantive changes by partner institutions.</td>
</tr>
<tr>
<td>9.5</td>
<td>The OPTI shall develop a reporting and communication process with all of its partners to maintain a flow of information and have scheduled periodic presence at or with all OPTI sites of officials no less than annually.</td>
</tr>
<tr>
<td>9.6</td>
<td>Non-AOA accredited institutions (those not BHFA- or COCA-accredited) may be members of an OPTI and participate in AOA educational activities via a sponsorship agreement with a BHFA or COCA institution within the same OPTI. This sponsorship agreement must be reviewed and documented at least every five years. This sponsorship agreement shall be clearly delineated from the OPTI affiliation agreement if combined within the same document.</td>
</tr>
<tr>
<td>9.7</td>
<td>Each OPTI shall develop guidelines, policies and procedures that ensure the completion of an internal review at the midpoint between accreditation reviews for every OGME program in all member institutions.</td>
</tr>
<tr>
<td>9.8</td>
<td>The governing body shall ensure that its members and officers avoid conflicts of interest with respect to the affairs of the OPTI.</td>
</tr>
<tr>
<td>9.9</td>
<td>Each OPTI shall document in its self studies and annual reports that ongoing or periodic strategic planning is occurring to meet its stated mission, objectives, and outcome measurements.</td>
</tr>
<tr>
<td>9.10</td>
<td>Each OPTI shall maintain a permanent and safe system for keeping records.</td>
</tr>
<tr>
<td>9.11</td>
<td>Each OPTI shall ensure that its educational program is under the direction and supervision of an OPTI academic officer (OAO). The OAO shall be a DO who possesses an earned DO degree from a COCA-accredited COM, completed an AOA-approved internship or residency, and AOA-BOS Board certification.</td>
</tr>
<tr>
<td>9.12</td>
<td>Each OPTI shall publish, via electronic or print media, and update at least every other year, a catalog and/or other appropriate document that shall include at least the programs offered, salary and benefit package information, entrance requirements, and such general and policy information as is necessary for interns and residents to make informed choices about application.</td>
</tr>
<tr>
<td>9.13</td>
<td>Each OPTI shall complete and forward to the AOA an annual report, which is due 60 days from the completion of the academic year, normally September 1st.</td>
</tr>
<tr>
<td>9.14</td>
<td>Each OPTI shall jointly confer, with its partner institution(s), certificates of completion on those interns and residents who have satisfactorily completed the requirements for graduation.</td>
</tr>
<tr>
<td>9.15</td>
<td>Each OPTI shall commit the financial resources necessary to operate and maintain its postdoctoral educational mission and objectives.</td>
</tr>
<tr>
<td>9.16</td>
<td>Each OPTI shall define a financial plan and budget that is linked to its strategic plan, annual educational plan and outcomes, and that reflects profit/loss detailed allocations to all members.</td>
</tr>
<tr>
<td>9.17</td>
<td>Affiliation agreements between the OPTI and its member institutions shall be renewed in accordance with the bylaws of the OPTI.</td>
</tr>
</tbody>
</table>
## C. Program Evaluation

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>Each OPTI shall comply with all policies, basic standards, and requirements for intern/resident program approval as published by the AOA in the individual program documents.</td>
</tr>
<tr>
<td>9.2</td>
<td>Each OPTI shall have an Osteopathic Graduate Medical Education (OGME) Committee to oversee the postdoctoral training program that meets at least two times per academic year.</td>
</tr>
<tr>
<td>9.3</td>
<td>The OGME committee shall include the OPTI AO, institutional DMEs, residency program director representatives, faculty representatives, intern and resident representatives, and representatives from the COMs.</td>
</tr>
<tr>
<td>9.4</td>
<td>The responsibility of the OGME committee shall be clearly stated. The OGME shall document its effectiveness through outcome measures consistent with the OPTI strategic plan goals.</td>
</tr>
<tr>
<td>9.5</td>
<td>The OGME committee shall have a review process for corrective action plans submitted by partner training institutions in response to findings resulting from AOA program inspections. All corrective action plans shall be approved with signature by the OPTI's AO prior to submission to the AOA and reported to the OGME committee.</td>
</tr>
<tr>
<td>9.6</td>
<td>The OGME committee shall review each partner institution’s core competency institutional plan and ensure an appropriate progression of education and evaluation methodologies.</td>
</tr>
<tr>
<td>9.7</td>
<td>Each OPTI shall enforce compliance with AOA and specialty college accreditation standards in each of its programs and member hospitals.</td>
</tr>
<tr>
<td>9.8</td>
<td>The OPTI shall implement a system of program evaluation that assesses and measures the effectiveness of each educational program and establishes opportunities for improvement.</td>
</tr>
<tr>
<td>9.9</td>
<td>Each OPTI shall have a system in place that allows interns and residents to submit program evaluations.</td>
</tr>
</tbody>
</table>

## D. Research Standards

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>Each OPTI shall establish policies and guidelines governing scientific research activities in accordance with local, state, and Federal government guidelines.</td>
</tr>
<tr>
<td>9.2</td>
<td>Each OPTI shall facilitate and provide research education, assistance, and resources directly to interns, residents, and institutions to encourage research and to meet the specialty college requirements.</td>
</tr>
<tr>
<td>9.3</td>
<td>Each OPTI shall provide ready access to basic science and/or clinical research mentorship.</td>
</tr>
<tr>
<td>9.4</td>
<td>The OPTI shall support and provide a mechanism to recognize residents who conduct research activities.</td>
</tr>
<tr>
<td>9.5</td>
<td>The OPTI shall seek funding, either externally generated or internally budgeted (not only from the COM), to provide for OPTI-wide or program specific research efforts of its member faculty and residents or students.</td>
</tr>
<tr>
<td>9.6</td>
<td>The OPTI shall support, promote, and facilitate publications in peer review journals from OPTI community based residents and/or faculty.</td>
</tr>
</tbody>
</table>
### E. Faculty and Instruction

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>The OPTI in conjunction with its COM partner(s) shall have a system for appointments that recognizes the participation of medical educators in postdoctoral programs.</td>
</tr>
<tr>
<td>9.2</td>
<td>The OPTI shall not discriminate on the basis of race, gender, color, religion, national origin, age, or sexual orientation in the selection of faculty and administrative personnel. Selection shall also be in accordance with state and federal government guidelines and in compliance with the <em>Americans with Disabilities Act</em>.</td>
</tr>
<tr>
<td>9.3</td>
<td>The OPTI shall provide faculty development goals and objectives through the OPTI strategic plan and evaluate the effectiveness of the faculty development program.</td>
</tr>
<tr>
<td>9.4</td>
<td>The OPTI shall implement a system of faculty evaluation that assesses and measures the effectiveness of the faculty member and establishes program and individual learning opportunities for improvement.</td>
</tr>
<tr>
<td>9.5</td>
<td>Each OPTI and its member institutions and designated faculty, shall integrate osteopathic principles and practice (OPP) into all teaching services as appropriate and shall have designated faculty to provide OPP teaching.</td>
</tr>
</tbody>
</table>

### F. Intern and Resident Status and Services

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>Each OPTI shall ensure the adoption of selection policies and criteria for intern and resident selection in accordance with specific policies and procedures in <em>OPTI Accreditation Handbook</em>.</td>
</tr>
<tr>
<td>9.2</td>
<td>Each OPTI shall ensure that transfer credit and waiver policies and procedures are applied in accordance with specialty college policies as approved by the COPT. Postdoctoral credit may be transferred only from AOA-approved or Accreditation Council for Graduate Medical Education-accredited postdoctoral training programs and shall be approved by AOA specialty college committees on education and evaluation.</td>
</tr>
<tr>
<td>9.3</td>
<td>Each OPTI shall have a system of intern and resident evaluation that measures and documents progress toward completion of the program including assessment of the AOA competencies.</td>
</tr>
<tr>
<td>9.4</td>
<td>Interns and residents shall be provided with a forum for free and open communication to discuss their training or welfare concerns. This forum shall have expression and voice through intern and resident representatives on the OGME committee.</td>
</tr>
<tr>
<td>9.5</td>
<td>The OPTI shall have a system to monitor individual partner institutions work hour policies and activities, and assure interns and residents that work hour policies are respected and enforced.</td>
</tr>
<tr>
<td>9.6</td>
<td>The OPTI shall provide a means for interns and residents to report without reprisal, inconsistencies, violations, or disregard for published work hour policies to the OPTI through their designated representative on the OGME committee.</td>
</tr>
</tbody>
</table>

### G. Curriculum

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>The OPTI shall assure the development and implementation of curricula designed to achieve program mission/objectives. These may also be developed by specialty colleges in accordance with their basic standards requirements, and by the COPT/Internship Evaluating Committee (IEC) for internship programs.</td>
</tr>
</tbody>
</table>
9.2 Each OPTI shall have a system in place that allows the OPTI to utilize trainee program evaluations for curricular improvements.

9.3 The OPTI shall provide for the integration of OPP throughout all AOA postdoctoral programs within the OPTI in accordance with basic standards requirements of the specialty college and the COPT/IEC.

9.4 The OPTI programs shall have the option of offering a portion of their postdoctoral curriculum at sites not owned or operated by the OPTI member or affiliate institutions. Such program arrangements shall include signed affiliation agreements that address specialty college and COPT/IEC requirements for any educational experiences utilized routinely for all interns and residents in that program other than for elective rotations.

9.5 Each OPTI will provide or ensure the provision of postdoctoral instruction, training, and evaluation in all seven AOA competencies including the art, science, principles and practice of osteopathic medicine.

9.6 The OPTI shall document core competency education and evaluation in each training program curriculum including supervision and monitoring of institutional core competency annual reports by the OPTI GME committee.

9.7 The OPTI shall monitor compliance with the internal review process requirements at each of its partner training institutions.

9.8 The OPTI shall document a process by which it shall actively assist any partner program receiving less than a three-year approval.

9.9 The OPTI shall have a process in place by which it can demonstrate assistance in the development of new osteopathic programs in member institutions including but not limited to completion of program description, development of goal and objective based curricula, and completion of required AOA accreditation documentation.

### H. Facilities

<table>
<thead>
<tr>
<th>Standard No.</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>The OPTI shall, at its own, and at all affiliated institutions, assure the provision of access to appropriate learning resources necessary for the delivery of the postdoctoral curricula, a library containing a wide selection of modern textbooks and current periodicals, either in printed or digital format applicable to the medical services rendered by the OPTI. The library shall be under the supervision of a professionally trained librarian.</td>
</tr>
<tr>
<td>9.2</td>
<td>The OPTI shall provide full library access to print or electronic learning resources at all times to all trainees at each site.</td>
</tr>
</tbody>
</table>
## Overview

### Prerequisites for Accreditation

| A.9.1 | Membership Policy (A-04) |
| A.9.2 | Organization Policy (A-05) |
| A.9.3 | Membership Policy (A-04) |
| A.9.4 | Membership Policy (A-04) |
| A.9.5 | Approved Training Programs Policy (A-01) |
| A.9.6 | Sponsorship Policy (B-12) |
| A.9.7 | Membership Policy (A-04) |
| A.9.8 | Affiliation Agreements Policy (B-01) |
| A.9.9 | Member Institution AOA Certification Policy (A-03) |
| A.9.10 | Accreditation Standards Policy (C-01) |

### Organization, Governance, and Finance

| B.9.1 | Mission, Goals, and Objectives Policy (B-10) |
| B.9.2 | Bylaws Policy (A-02) |
| B.9.3 | Governing Board Membership Policy (B-08) |
| B.9.4 | Governing Board Policies (B-09) |
| B.9.5 | Provision of Learning Resources Policy (H-02) |
| B.9.6 | Affiliation Agreements Policy (B-01) |
| B.9.7 | OGMEC Internal Review Policy (G-04) |
| B.9.8 | Conflict of Interest Policy (B-05) |
| B.9.9 | Annual Report Policy (B-02) |
| B.9.10 | Confidentiality of Records Policy (B-04) |
| B.9.11 | Supervision of Educational Program Policy (B-14) |
| B.9.12 | Publications Policy (B-11) |
| B.9.13 | Annual Report Policy (B-02) |
| B.9.14 | Certificate of Completion Policy (B-03) |
| B.9.15 | Financial Resources Policy (B-07) |
| B.9.16 | Financial Plan and Budget Policy (B-06) |
| B.9.17 | Affiliation Agreements Policy (B-01) |

### Program Evaluation

| C.9.1 | Accreditation Standards Policy (C-01) |
| C.9.2 | OGMEC Membership and Meeting Frequency Policy (C-03) |
| C.9.3 | OGMEC Membership and Meeting Frequency Policy (C-03) |
| C.9.4 | OGMEC Responsibility Policy (C-04) |
| C.9.5 | OGMEC Corrective Action Plan Policy (C-02) |
| C.9.6 | OGMEC Core Competency Compliance Policy (G-02) |
| C.9.7 | Accreditation Standards Policy (C-01) |
| C.9.8 | Program Evaluation Policy (C-06) |
| C.9.9 | Program Evaluation Policy (C-06) |

### Research

| D.9.1 | MWU/OPTI Research Policies (D-01) |
| D.9.2 | Research Education and Resource Assistance Policy (D-04) |
| D.9.3 | MWU/OPTI Research Policies (D-01) |
| D.9.4 | Recognition of Resident Research Activities Policy (D-03) |
| D.9.5 | Research Funding Assistance Policy (D-05) |
| D.9.6 | Publications Policy (D-02) |

### Faculty and Instruction

| E.9.1 | Faculty Appointments Policy (E-02) |
| E.9.2 | Faculty and Administrative Personnel |
| E.9.3 | Nondiscrimination Policy (E-01) |
| E.9.4 | Faculty Development Policy (E-03) |
| E.9.5 | Faculty Evaluation Policy (E-04) |
| E.9.6 | Integration of Osteopathic Principles and Practice |

### Intern and Resident Status and Services

| F.9.1 | Trainee Selection and Transfer Policy (F-02) |
| F.9.2 | Trainee Selection and Transfer Policy (F-02) |
| F.9.3 | Trainee Evaluation Policy (F-03) |
| F.9.4 | OGMEC Participation from Trainee Representatives |
| F.9.5 | Work Hour Compliance Policy (F-04) |
| F.9.6 | Work Hour Compliance Policy (F-04) |

### Curriculum

| G.9.1 | OGMEC Curriculum Review Policy (G-03) |
| G.9.2 | Integration of Osteopathic Principles and Practice |
| G.9.3 | Policy (E-05) |
| G.9.4 | Training Sites Not Owned or Operated by the |
| G.9.5 | MWU/OPTI Policy (G-06) |
| G.9.6 | OGMEC Core Competency Compliance Policy (G-02) |
| G.9.7 | OGMEC Core Competency Compliance Policy (G-02) |
| G.9.8 | OGMEC Internal Review Policy (G-04) |
| G.9.9 | Program Accreditation Assistance Policy (G-05) |
| G.9.9 | New Program Development Policy (G-05) |

### Facilities

| H.9.1 | Provision of Learning Resources Policy (H-02) |
| H.9.2 | Library Policy (H-01) |
A. PREREQUISITES FOR ACCREDITATION

POLICIES AND PROCEDURES
POLICY NAME: APPROVED TRAINING PROGRAMS POLICY

POLICY NO. A-01

PURPOSE

To ensure the MWU/OPTI offers a minimum of one AOA-approved OGME-1 program and two AOA-approved residency programs, at least one of which shall be in primary care (family medicine, general internal medicine, obstetrics and gynecology, or general pediatrics).

POLICY

The Midwestern University/OPTI maintains the minimum number and specific training programs as required by the Standards for Accreditation of Osteopathic Postdoctoral Training Institutions of the American Osteopathic Association. These programs include one AOA-approved OGME-1 program and two AOA-approved residency programs, at least one of which is in primary care (family medicine, general internal medicine, obstetrics and gynecology, or general pediatrics).

The Midwestern University/OPTI complies with all policies, basic standards, and requirements for training program approval as published by the AOA in the individual program and specialty college documents.

The Midwestern University/OPTI oversees and reviews the actions of member institutions’ AOA-approved training programs. In accordance with AOA policy, any changes in program size, Program Directors, Directors of Medical Education, or any elimination of programs must be submitted to the MWU/OPTI for endorsement prior to submission for AOA approval.
PURPOSE

To ensure that the Governing Board of the MWU/OPTI adopts bylaws or equivalent documents that define the responsibilities of the Governing Board, administration, postdoctoral faculty, and other significant constituencies and set forth the organizational structure of the MWU/OPTI.

POLICY

The Midwestern University/OPTI Bylaws establish the organizational structure and define the responsibilities of the governing body, the administration, the postdoctoral faculty, and other significant constituencies. The Bylaws are revised as necessary, and all revisions and modifications are subject to approval of the Governing Board.

The MWU/OPTI Bylaws provides two levels of membership, and collectively they are referred to as the Participating Partners.

- **Associate** membership includes those institutions with full AOA accreditation
- **Affiliate** membership includes those institutions that contract with the MWU/OPTI for salaried housestaff

The Bylaws of the MWU/OPTI establish the rights and responsibilities of the MWU/OPTI and its Participating Partner institutions.

The figure below shows the Midwestern University/OPTI governance structure:
As outlined in Article 8.6 of the Midwestern University/OPTI Bylaws, Participating Partner institutions are required to notify the MWU/OPTI Office of the Executive Director of any substantive change that Partner has made. The MWU/OPTI Bylaws require the Executive Director/Chief Academic Officer to notify the AOA and the appropriate specialty college of any substantive changes reported by Participating Partner institutions.

Substantive changes may include the following:

- Change in the Program Director
- Change in the use of affiliate facilities needed to provide curriculum
- Change in ownership or management of the affiliated institution
- Change in the Director of Medical Education
- Any change that may be expected to affect the conduct of the approved OPTI training program

The MWU/OPTI will notify the AOA in the event of a substantive change in its operation including:

- Changes in the established mission, objectives, or location of the MWU/OPTI
- Changes in the legal status or form of control of the MWU/OPTI
- Additions of instruction that represent a significant departure in terms of curriculum content, training program options, or method of delivery of the curriculum of training
- Increase in the number of training positions available within the MWU/OPTI
POLICY NAME: MEMBER INSTITUTION AOA CERTIFICATION POLICY

PURPOSE

To ensure MWU/OPTI Participating Partner institutions provide the MWU/OPTI with documentation that they recognize and accept the certifying boards of the AOA as specialty Board certification on an equal basis with those certifying boards recognized by the American Board of Medical Specialties for the purpose of granting hospital privileges.

POLICY

Associate members in the Midwestern University/OPTI are required to provide documentation of their recognition and acceptance that, for the purpose of granting hospital privileges, the certifying boards of the AOA are considered specialty Board certifications equivalent to the certifying boards of the American Board of Medical Specialties.

The Midwestern University/OPTI currently operates primarily in three states: Arizona, Illinois, and Indiana. These states have passed overarching legislation that ensures equal rights for osteopathic physicians in all manners of practice and effectively precludes individual hospitals from the unlawful discrimination of osteopathic physicians on their medical staffs. Arizona maintains several statutes regarding practice as Osteopathic Physicians & Surgeons and includes a duplicate statute that exists for allopathic physicians in a separate citing. The State of Illinois statute that addresses this issue is the Osteopathic and Allopathic Healthcare Discrimination Act, and the state of Indiana statute is Senate Bill 13 as adopted 1/28/97.
PURPOSE

- To ensure the MWU/OPTI is composed of member hospitals accredited by either The Joint Commission, the BHFA, or an equivalent healthcare accrediting entity, and that the MWU/OPTI membership includes at least one COM accredited by the Commission on Osteopathic College Accreditation

- To ensure the MWU/OPTI incorporates other healthcare facilities and organizations, such as community health centers, ambulatory facilities, managed care organizations, school health clinics, Federal health centers, and rural health clinics, through formally documented affiliation agreements

- To ensure MWU/OPTI governance is organized to permit the free association of its member COMs and hospitals with other AOA-approved educational consortia, institutions, or OPTIs

- To ensure the MWU/OPTI offers opportunities for osteopathic student clerkship experiences

POLICY AND PROCEDURES

The MWU/OPTI membership includes of its two Colleges of Osteopathic Medicine, both of which are fully accredited by the Commission on Osteopathic College Accreditation:

- Arizona College of Osteopathic Medicine
- Chicago College of Osteopathic Medicine

1. The MWU/OPTI's COM members maintain membership in the American Association of Colleges of Osteopathic Medicine.

2. The MWU/OPTI Participating Partner institutions are required to obtain accreditation by one of the following:

   - Bureau of Healthcare Facilities Accreditation
   - The Joint Commission
   - Centers for Medicare & Medicaid Services
   - Equivalent health care accrediting agencies
3. Membership in the Midwestern University/OPTI is available to hospitals and healthcare providers, including private physicians, community health centers, ambulatory care facilities, managed care organizations, school health clinics, Federal health centers, and rural health clinics. The MWU/OPTI members may affiliate with other colleges of osteopathic medicine (COMs) in the clinical training of their students, interns, and residents.

4. Any institution with an AOA-approved residency program may apply for membership in the Midwestern University/OPTI by submitting a Letter of Intent to the Executive Director/Chief Academic Officer. Letters of Intent are reviewed, discussed, and acted upon at the next available meeting of the Governing Board.

5. Members of the MWU/OPTI are encouraged to generate opportunities for osteopathic student clerkship experiences.
PURPOSE

To establish the formally organized entity of the Midwestern University/Osteopathic Postdoctoral Training Institution (MWU/OPTI)

POLICY

The Midwestern University Board of Trustees authorizes formation of the Midwestern University/Osteopathic Postdoctoral Training Institution. The Board of Trustees established the MWU/OPTI as a formal entity on December 9, 1996. Application for AOA approval of the MWU/OPTI was submitted in February 1998, and initial accreditation was granted on February 15, 1999.
B. ORGANIZATION, GOVERNANCE, AND FINANCE

POLICIES AND PROCEDURES
PurpOse

To ensure the MWU/OPTI completes and maintains affiliation agreements with member institutions and training sites outside the MWU/OPTI that provide educational opportunities in accordance with Federal, state, and local regulations.

POLICY

All Participating Partners in the Midwestern University/OPTI execute appropriately signed affiliation agreements prior to the initiation of activity at their sites. The affiliation and participation of non-MWU/OPTI COMs are formally established through contracts with the MWU/OPTI and the other COMs.

In addition, the Bylaws provide in Section 8.1 that “Conditions of membership in the MWU/OPTI shall be established through contractual arrangements. Membership in the MWU/OPTI will become effective upon completion of contractual arrangements.”
PURPOSE

To establish the process for the completion and submission to the AOA of an annual report that is due 60 days from the completion of the academic year, normally by September 1.

POLICY AND PROCEDURES

The regional OGMECs establish procedures, supervise, complete, and submit annual reports as approved by the MWU/OPTI Accreditation Committee to the AOA within 60 days of the completion of the academic year, normally by September 1.

1. The Chairs of the regional OGMECs prepare the current version of the Online Annual Report form immediately upon its receipt from the AOA-COPTI for presentation to the MWU/OPTI Accreditation Committee.

2. The Chairs of the regional OGMECs provide the MWU/OPTI Accreditation Committee with draft responses to all questions on the Online Annual Report at least 30 days prior to the AOA-COPTI deadline.

3. The MWU/OPTI Accreditation Committee reviews, directs revisions as needed, and must approve the final form of the Online Annual Report prior to formal submission.

4. The MWU/OPTI Accreditation Committee designates one individual to upload the data and submit the form in time to meet the AOA-COPTI deadline.
POLICY NAME:  CERTIFICATE OF COMPLETION POLICY

POLICY NO.  B-03

PURPOSE

To ensure that the MWU/OPTI jointly confers, with its Participating Partner institutions, certificates of completion on those trainees who have satisfactorily completed the requirements for graduation

POLICY AND PROCEDURES

Graduates of AOA-approved postdoctoral internship training programs participating in the Midwestern University/OPTI receive a certificate of completion from the MWU/OPTI or an OGME-1 completion letter from their Program Director.

Graduates of AOA-approved residency training programs participating in the Midwestern University/OPTI receive certificates of completion upon fulfillment of all program requirements.

1. Certificates must be signed by representatives of their training institutions and the MWU/OPTI. Each certificate includes:

   - Midwestern University/OPTI
   - American Osteopathic Association
   - Name of member institution and training program number
   - Name of graduating trainee
   - Inclusive dates of the training program
   - Signatures of
     - Chair, MWU/OPTI Governing Board
     - Executive Director/Chief Academic Officer, MWU/OPTI
     - Director of Medical Education, member institution
     - Program Director
     - Other institutional officers as mandated by Participating Partner institutions
PURPOSE

To ensure that the MWU/OPTI maintains a permanent and safe system for keeping records

POLICY AND PROCEDURES

The Midwestern University/OPTI maintains permanent files for trainees in a secure location in OGMEC offices.
POLICY NAME: CONFLICT OF INTEREST POLICY

PURPOSE

To ensure that members and officers of the MWU/OPTI Governing Board avoid conflicts of interest with respect to the affairs of the MWU/OPTI

POLICY

Each member of the MWU/OPTI Governing Board annually signs a Statement of Disclosure/Conflict of Interest, and members recuse themselves from votes relevant to conflicting issues.
POLICY NAME:    FINANCIAL PLAN AND BUDGET POLICY

PURPOSE

To develop an annual budget that provides the financial resources necessary to adequately fund the financial needs of the MWU/OPTI

POLICY

The fiscal year of the Midwestern University/OPTI extends from July 1 through June 30. The MWU/OPTI initiates the annual budgetary process in October of the preceding fiscal year. The budget anticipates MWU/OPTI revenues and MWU/OPTI expenses related to and necessary for the operation of the MWU/OPTI.

Once budgeted revenues and expenses are developed under the direction of the MWU/OPTI Treasurer, the budget is presented to the University’s Board of Trustees for approval and subsequently presents the budget to the MWU/OPTI Governing Board for approval.
POLICY NAME: FINANCIAL RESOURCES POLICY

PURPOSE

To ensure the MWU/OPTI commits the financial resources necessary to operate and maintain its postdoctoral educational mission and objectives.

POLICY

Participating Partner institutions of the MWU/OPTI and Midwestern University negotiate an annual rate of reimbursement per trainee, remitted to the University to defray training site costs associated with Participating Partner programs. These funds provide the financial resources necessary to operate and maintain the MWU/OPTI's postdoctoral educational mission and objectives. Any deficiency has historically been paid by the University. The MWU/OPTI is committed to achieving its goal of self-sufficiency through annual reassessment and progressively successful initiatives.
POLICY NAME: GOVERNING BOARD MEMBERSHIP POLICY

PURPOSE

To ensure representation on the MWU/OPTI Governing Board is made available to each Associate member institution and membership is clearly defined in the Bylaws or equivalent documents.

POLICY

The MWU/OPTI Bylaws provides two levels of membership:

- **Associate** membership includes those institutions with full AOA accreditation.
- **Affiliate** membership includes those institutions that contract with the MWU/OPTI for salaried housestaff.

Membership in the MWU/OPTI is established through affiliation agreements. Membership in the MWU/OPTI is effective upon execution of such affiliation agreements. Affiliation agreements continue on an ongoing basis and are subject to periodic assessment.

The Governing Board membership includes one representative from each of the Associate members of the MWU/OPTI, the Executive Director/Chief Academic Officer, the President and Chief Executive Officer of Midwestern University, the Executive Vice President and Chief Operating Officer of Midwestern University, the Vice President and Chief Academic Officer for Dental and Medical Education at Midwestern University, the Vice President of Human Resources and Administration of Midwestern University, the Vice President of Finance of Midwestern University, the Director of Accreditation & Support Services at Midwestern University, the Deans of the COMS, and the Chairs of the OGMECs.

The Governing Board may include others who may be appointed by the Chair as recommended by the Nominating Committee. Individuals with broad experience in fields such as accreditation, finance, human resources, marketing, professional associations, and publications may be appointed in order to bring this expertise to the MWU/OPTI Governing Board.

Each Associate member is invited to appoint a representative to the Governing Board. Specific individuals who represent Associate member institutions may change with approval of the Governing Board.

Nominations to the Governing Board may be presented at any time and by any member of the Governing Board. There is no limit set on the number of members who may serve on the Governing Board.
Board. The term of office is three years, members may serve consecutive terms, and there are no age or term limits.
PURPOSE

To outline and define the composition and duties of the MWU/OPTI Governing Board

POLICY

The composition and duties of the MWU/OPTI Governing Board are outlined and defined as follows:

Composition
The Governing Board of the Midwestern University/OPTI is composed of a dynamic group of individuals representing its educational partners and the University’s two campus regions (Glendale, AZ and Downers Grove, IL). Membership is modified by approval on request or when deemed desirable due to changes in personnel at Associate member institutions. The Bylaws of the MWU/OPTI are included in each meeting book and are reviewed and amended as necessary to meet changing accreditation standards, the needs of its constituencies, and the needs of its COMs.

Duties
In exercising its oversight authority, the Governing Board ensures conformity to all educational and administrative standards by:

• Approving minutes
• Reviewing Executive Committee minutes and reports
• Reviewing and updating the Strategic Plan
• Accepting and approving Finance Committee minutes and reports
• Reviewing the regional Osteopathic Graduate Medical Education (OGME) Committee minutes and reports
• Monitoring recent AOA correspondence pertaining to OPTIs
• Discussing, planning, and implementing educational initiatives with Participating Partner institutions
• Introducing new business

At each meeting of the Governing Board, the members review minutes and action items of the regional Osteopathic Graduate Medical Education Committees including, but not limited to, board scores, Corrective Action Plans, and internal reviews.

Meeting frequency
Governing Board meetings are held a minimum of semiannually or at such other frequency as the Governing Board may determine.
Committees

The Governing Board appoints the members of each committee. The Governing Board reviews minutes, reports, and actions of each committee to ensure that each committee acts in a manner conforming to its assigned function and furthers the mission and objectives of the MWU/OPTI. The standing and ad hoc committees include:

- Accreditation Committee
- Education Committees
  - Downers Grove Campus Osteopathic Graduate Medical Education Committee
  - Glendale Campus Osteopathic Graduate Medical Education Committee
- Executive Committee (ad hoc)
- Finance Committee (ad hoc)
- Nominating Committee
PURPOSE

To ensure the mission, goals, and objectives of the MWU/OPTI are defined and reviewed through its documents, self studies, and annual reports and to provide evidence that its activities support its mission, goals, and objectives.

POLICY AND PROCEDURES

The Midwestern University/Osteopathic Postdoctoral Training Institution strives to become a national leader in providing osteopathic graduate medical education through Associate and Affiliate memberships with healthcare providers. The MWU/OPTI fosters a commitment to the osteopathic philosophy, provides integration of preclinical training for third and fourth year medical students, and offers opportunities for scientific research through stringent educational and administrative standards.

The mission statement of the Midwestern University/OPTI is published in Article IV of the Bylaws. The Governing Board approves the mission statement and revises the goals and objectives as needed to enhance the Midwestern University/OPTI. The goals of the Midwestern University/OPTI as referenced in the mission statement include:

- Be a national leader in providing osteopathic graduate medical education
- Foster a commitment to the osteopathic philosophy
- Provide integration of preclinical training (for third and fourth year medical students)
- Offer opportunities for scientific research (through stringent educational and administrative standards)

1. The mission statement guides the development of the Strategic Plan and leads to enactment of the policies and procedures necessary to accomplish its goals and objectives.

2. Through its annual reports and self studies, the Midwestern University/OPTI documents activities that support its mission, goals, and objectives.

3. Midwestern University/OPTI provides transparent operation of the MWU/OPTI to engender collaboration among its educational partners. Collaboration fosters development in areas of mutual interest and benefit, including educational standards, academic programs, grants acquisition, evaluation activities, faculty development, curricular development, program development, continuing medical education, research and scholarly activities, marketing, promotion, and recruitment.
POLICY NAME: PROGRAM CATALOG PUBLICATION POLICY

PURPOSE

To ensure the MWU/OPTI publishes, via electronic or print media, and updates at least every other year a catalog or other appropriate document that includes at least the programs offered, salary and benefit package information, entrance requirements, and such general and policy information as is necessary for trainees to make informed choices about application.

POLICY

The Midwestern University/OPTI maintains a web site (www.opti.midwestern.edu) and publishes other appropriate documents that detail the programs offered, entrance requirements, and such general and policy information as is necessary for trainees to make informed choices about application. The web site material is regularly updated by the Office of the Executive Director to ensure that information posted is current and applicable. All prospective applicants to the MWU/OPTI are further referred to the American Osteopathic Association’s web page, http://opportunities.osteopathic.org/index.htm, which was designed to serve as the definitive source for comprehensive and up-to-date salary and benefit package information.
POLICY NAME: SPONSORSHIP POLICY

POLICY NO. B-12

PURPOSE

To ensure that the MWU/OPTI does not sponsor AOA-approved programs to comply with the AOA guideline that only provisionally or fully BHFA- or COCA-accredited institutions may sponsor AOA-approved programs.

POLICY

The Midwestern University/OPTI does not sponsor AOA-approved programs. All affiliated residency training programs at Participating Partner institutions are sponsored by the base hospitals. All affiliated residency training programs at non-BHFA hospitals, or equivalent institutions, are sponsored by the Commission on Osteopathic College Accreditation-accredited Arizona College of Osteopathic Medicine and Chicago College of Osteopathic Medicine.
POLICY AND PROCEDURES

The Strategic Plan is a rolling, multiyear document that identifies and delineates action steps toward achieving strategic goals that fulfill the mission of the MWU/OPTI through objectives based on outcomes measurements and data. The MWU/OPTI utilizes its self studies and annual reports to inform the strategic planning process.

The Governing Board reviews the MWU/OPTI Strategic Plan at its meetings and develops, updates, or alters the Plan as needed. The Governing Board ensures that the Strategic Plan is linked to its financial plan and budget. Strategic planning retreats are scheduled as deemed necessary by the members of the Board.

The MWU/OPTI Strategic Plan:

1. Outlines initiatives generated from data derived from outcomes measurements, self studies, and annual reports and plans to improve or enhance the MWU/OPTI’s ability to meet its stated mission, goals, and objectives
2. Links to the MWU/OPTI financial plan and budget
3. Is consistent with documentation of the MWU/OPTI’s effectiveness based on outcomes measures and data
4. Provides faculty development goals, objectives, and evaluations of the effectiveness of the MWU/OPTI faculty development program in relation to the mission, goals, and objectives of the MWU/OPTI
PURPOSE

To ensure that the MWU/OPTI educational program remains under the direction and supervision of an Academic Officer who possesses the following attributes:

- Doctor of Osteopathic Medicine degree
- D.O. degree from a COCA-accredited COM
- AOA-approved internship or residency program
- AOA-BOS Board certification

POLICY

The Midwestern University/OPTI is organized under the direction and supervision of an Executive Director/Chief Academic Officer with qualifications including: Doctor of Osteopathic Medicine degree conferred by a COCA-accredited COM, AOA-approved internship or residency, and AOA-BOS Board certification.
<table>
<thead>
<tr>
<th>POLICY NAME:    COMMUNICATIONS POLICY</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLICY NO.     B-15</td>
</tr>
<tr>
<td>APPROVAL DATE:</td>
</tr>
</tbody>
</table>

**PURPOSE**

To ensure that the MWU/OPTI has a reporting and communication process with all of its Participating Partner institutions to:

- Maintain a flow of information
- Schedule period presence of officials at or with all MWU/OPTI sites no less than annually

**POLICY AND PROCEDURES**

The MWU/OPTI maintains communication with its Participating Partner institutions through:

- Annual on-site visits at a minimum
- OGMEC meetings with representative membership from all Participating Partner institutions
- Site visit reports to the MWU/OPTI OGMECs and Governing Board
- Web site information ([www.opti.midwestern.edu](http://www.opti.midwestern.edu))
C. PROGRAM EVALUATION

POLICIES AND PROCEDURES
POLICY NAME:  ACCREDITATION STANDARDS POLICY

PURPOSE

To ensure the MWU/OPTI complies with and observes the standards of the AOA Basic Document for Postdoctoral Training, Section IX: OPTI Accreditation, as well as the policies and procedures stipulated in the OPTI Accreditation Handbook, as currently in effect.

POLICY

The Midwestern University/OPTI ensures that all member programs and institutions remain in compliance with the published and current specialty college accreditation standards set forth by the American Osteopathic Association. The Chairs of the regional OGMECs are responsible for ensuring compliance, and the Governing Board affirms such compliance through its review processes.

The Midwestern University/OPTI complies with and observes all policies, procedures, and standards stipulated in the American Osteopathic Association’s Basic Document for Postdoctoral Training Programs, as well as the OPTI Accreditation Handbook, as currently effective.
POLICY NAME: OGMEC CORRECTIVE ACTION PLAN POLICY

PURPOSE

To provide a process for the regional OGMECs to review Corrective Action Plans submitted by Participating Partner institutions in response to findings resulting from AOA program inspections.

POLICY AND PROCEDURES

The MWU/OPTI provides a process for the regional OGMECs to review Corrective Action Plans submitted by Participating Partner institutions in response to AOA program inspection findings to ensure compliance is achieved.

1. Results of all specialty college program reviews are discussed at the regional OGMEC meetings and MWU/OPTI Accreditation Committee meetings.

2. Corrective Action Plans submitted by Participating Partner institutions are reviewed by the regional OGMECs. Corrective Action Plans may be returned to the Participating Partner institution for improvement based on OGMEC recommendations.

3. Approved Corrective Action Plans are signed by the MWU/OPTI Executive Director/Chief Academic Officer prior to submission to the AOA.

4. The regional OGMECs monitor compliance with Corrective Action Plans and review the six-month compliance report as required by the AOA.
Midwestern University/Osteopathic Postdoctoral Training Institution

Policy Name: OGMEC Membership and Meeting Frequency Policy

Purpose

To establish membership requirements for the regional Osteopathic Graduate Medical Education Committees and set the minimum standard for meeting frequency.

Policy and Procedures

The MWU/OPTI establishes membership requirements for the regional Osteopathic Graduate Medical Education Committees and sets the minimum standard for the frequency of meetings.

1. The COM members appoint representatives and those representatives serve as the regional Chairs of the OGMECs.

2. The Executive Director is the MWU/OPTI Chief Academic Officer and serves as a member of the OGMECs.

3. The Directors of Medical Education (DMEs) for Participating Partners serve as members of their regional OGMECs.

4. At a minimum, one Program Director (PD) from each Participating Partner serves as a representative on their regional OGMEM. If the DME also serves as a PD, no other representative is required, although the DME may appoint additional PDs with the approval of the Chair of the regional OGMEM.

5. The OGMEC Chairs annually appoint at least one faculty representative.

6. The OGMEC Chairs annually appoint at least one resident representative.

7. The OGMECs meet at least two times per academic year.
MIDWESTERN UNIVERSITY/OSTEOPATHIC POSTDOCTORAL TRAINING INSTITUTION

POLICY NAME: OGMEC RESPONSIBILITY POLICY

POLICY NO. C-04

PURPOSE

To clearly define the responsibilities of the MWU/OPTI Osteopathic Graduate Medical Education Committees and document OGMEC effectiveness through outcomes measures consistent with the MWU/OPTI strategic planning goals.

POLICY AND PROCEDURES

The general responsibilities of the regional OGMECs include defining, reviewing, and documenting the effectiveness of training programs through outcomes measures designed to ensure consistency with the MWU/OPTI mission and strategic planning goals and to ensure compliance with all AOA Standards for Accreditation.

Specific responsibilities include:

1. Reviews of program outcomes to monitor
   - Faculty adequacy
   - Trainee evaluation processes
   - Trainee progress toward advancement
   - Faculty evaluation data
   - Academic actions
   - Disciplinary actions
   - Duty hour processes and work hours
   - Core Competency Plans

2. Verification of compliance with the training standards as required by the AOA specialty colleges through
   - Reviews of annual training program curricular goals and objectives developed by the DMEs and Program Directors for compliance with stated educational objectives
   - Institutional core competency methodologies and evaluations
   - Participation as requested in preparation for training program inspections
   - Representation as requested on midcycle Internal Review Committees
   - Reviews of AOA Site Visit Inspection Reports
   - Analysis of deficiencies cited on any inspection that necessitates a Corrective Action Plan

3. Meeting a minimum of two times per year in person or via teleconference
4. Supervision of trainee work hours through

- Ensuring that work hours are monitored by the institutional Graduate Medical Education Committees
- Providing and monitoring a framework for trainees to report anonymously, without threat of reprisal, work hour inconsistencies through their resident representative on the institutional Graduate Medical Education Committee
- Reviewing work hour surveys completed by trainees, as part of the standardized online trainee program evaluation, to ensure appropriate actions correct identified noncompliance issues

5. Conducting annual reviews and approvals of the Institutional Core Competency Plans of Participating Partner institutions to ensure they are active, reassessed periodically, and adjusted as necessary through

- Direct reviews
- Annual DME reports

6. Reviews of the trainee evaluation process for each training program to facilitate program improvement through

- Collection and review of aggregate data from in-service examinations
- Annual collection and review of the three-year aggregate Board certification pass rate data as provided by the AOA
- Reviews of Participating Partner institution aggregate annual reports of program evaluations completed by trainees

7. Arranging an open forum for faculty representatives during regional OGME Committee meetings to resolve issues and to announce faculty development programs, meetings, and upcoming site inspections

8. Providing an open forum for trainee representatives during regional OGME Committee meetings to resolve issues and to disseminate information of interest

9. Conducting semiannual site visits of Participating Partner institutions, during which Chairs of the regional Osteopathic Graduate Medical Education Committees meet individually with trainees, faculty, and staff members to discuss current or outstanding educational or performance issues of trainees and conduct, at a minimum,

- Site visit reviews of Participating Partner institution GME offices
- Meetings with trainees
- Continuity clinic structure and patient panel verifications
- Documentation reviews of
  - Duty hour compliance reports
  - Faculty development
  - Sufficiency of institutional medical education program
  - Trainee evaluations
  - Program evaluations
  - CAP records (if required by specialty college)
Trainee Information, Verification, and Registration Audit (TIVRA) and Opportunities compliance

10. Submission of all regional OGMEC minutes and reports to the MWU/OPTI Governing Board for review

11. Verification of the presence of Graduate Medical Education Committees at Participating Partners

12. Verification of the development, implementation, maintenance, and improvement of OMM and research curricula to ensure Participating Partner Institutions offer adequate OMM and research education programs
Purpose

To establish a process for the creation, periodic review, and revision when necessary of the policies and procedures of the Osteopathic Graduate Medical Education Committee(s) (OGMECs) of the MWU/OPTI

Policy and Procedures

The MWU/OPTI establishes a process for the creation, periodic review, and revision when necessary of the policies and procedures of Osteopathic Graduate Medical Education Committee(s) (OGMECs).

1. All OGMEC proposals for new policies and revisions of existing policies undergo initial review by the MWU/OPTI Accreditation Committee.

2. Proposals for new policies and revisions of existing policy proposals that have received initial approval by the MWU/OPTI Accreditation Committee are presented formally to the MWU/OPTI Governing Board for final approval prior to implementation by the Chairs of the regional OGMECs.

3. An annual report summarizing changes in the AOA Basic Documents for Postdoctoral Training is presented by the regional OGMEC Chairs to the MWU/OPTI Accreditation Committee annually. This report includes OGMEC policy change recommendations needed to maintain compliance with accreditation standards.
PURPOSE

To establish the method by which the OGMECs of the MWU/OPTI measure program effectiveness and ensure completion and monitoring of trainee evaluations of programs to determine program effectiveness and to establish opportunities for improvement.

POLICY AND PROCEDURES

The MWU/OPTI establishes methods by which the OGMECs utilize trainee evaluations of programs to determine program effectiveness and to establish opportunities for improvement.

1. The OGMECs compile standardized sets of outcomes data for each training program.

2. Data sets include:

   - Three-year aggregate Board certification pass rates
   - Specialty college mandated in-service training examination scores
   - Standardized trainee evaluations of the program
D. Research

Policies and Procedures
PURPOSE

To establish and maintain policies and guidelines that govern the conduct of MWU/OPTI scientific research activities in accordance with local, state, and Federal government guidelines.

POLICY AND PROCEDURES

All MWU/OPTI research policies, including but not limited to those listed below, formally direct MWU/OPTI constituents to comply with all appropriate institutional policies in accordance with local, state, and Federal government guidelines in the conduct of scientific research activities.

MWU/OPTI Basic Sciences or Clinical Research Mentorship Policy
This policy is designed to ensure that the MWU/OPTI offers ready access to basic sciences or clinical research mentorship for trainees participating in the postdoctoral training programs.

The MWU/OPTI Program Directors serve as the assigned mentors for all trainee research projects. In addition, institutional Directors of Medical Education may identify clinical faculty members who may serve as mentors for trainees completing their specialty college research requirements.

Trainees participating in the MWU/OPTI may also receive assistance from:

Program Directors
Program Directors are assigned overarching mentorship responsibility for all trainee research activities.

Directors of Medical Education
MWU/OPTI’s institutional DMEs assist as needed to identify specific clinicians to serve one-on-one as mentors for trainees completing specialty college research requirements and to facilitate collaborations.

Office of Research & Sponsored Programs
Midwestern University’s ORSP helps trainees identify basic sciences and clinical faculty members to serve as research mentors. Selected members of the basic sciences and clinical faculty identified by the DMEs and ORSP staff members are available as needed to provide in-depth support for studies that require complex designs, IRB review, informed consents that meet HIPAA standards, and statistical analyses of data.
Regional OGMEC offices
Trainees may contact their regional OGMEC Chair for easily accessed assistance in identifying appropriate mentorship.

MWU/OPTI Research Policy
The MWU/OPTI promotes advancement of knowledge and scholarly activity through research facilitated by the institutional Directors of Medical Education and Program Directors. Additionally, the MWU/OPTI coordinates with Midwestern University’s Office of Research & Sponsored Programs, where additional services are available. Program Directors and Directors of Medical Education ensure that all research conducted within the training program meet all Federal, state, and local guidelines for the conduct of medical research and is reviewed by the appropriate Institutional Review Board (IRB). The Participating Partner postdoctoral training programs are required to include within their program descriptions and policies a statement describing the research requirement for each trainee as mandated by the American Osteopathic Association and the various specialty colleges.

MWU/OPTI IRB Policy
The MWU/OPTI does not operate its own IRB, and therefore it relies on the IRB reviews provided by Participating Partner institutions with a Federal Wide Assurance (FWA). The Participating Partner institution where specific research is performed may provide IRB review, or the Midwestern University IRB may review MWU/OPTI research proposals to ensure that research involving human subjects meets all regulations in 45 CFR Part 46. In some circumstances, dual IRB reviews may be required to remain compliant with the appropriate IRB policies of the institutions involved. Midwestern University will not require performance of a dual review provided that all of the following conditions are met:

- The research is conducted at an institution with an Office for Protection of Research Risks (OPRR), approved Multiple Project Assurance (MPA), or Federal Wide Assurance (FWA)
- The primary appointment of the principal investigator (PI) is with the Participating Partner institution
- Midwestern University is not the primary recipient of funding
- Research is conducted entirely at the other site

If any of these conditions are not met, the research proposal must be submitted to the University’s IRB for review and approval.

Program Directors and Directors of Medical Education are responsible for ensuring that no research involving human subjects is initiated without the prior IRB approval appropriate for each research project.

MWU/OPTI Conflict of Interest on Extramural Funding Policy
Research grants submitted to funding agencies often require that the Principal Investigator (PI) file a Conflict of Interest disclosure statement with the submitting institution prior to grant submission. It is the policy of the MWU/OPTI that all of its constituents submitting research grants must comply with all grant submission requirements of the submitting institution, including those pertaining to Conflict of Interest. Program Directors and Directors of Medical Education are responsible for ensuring that no research grants are submitted by MWU/OPTI constituents without following the policies of the submitting institution.
MWU/OPTI Clinical Trials Policy
The MWU/OPTI has not directly sponsored any clinical trials to date, but MWU/OPTI faculty and trainees are instead encouraged to participate in clinical trials at their institutions. It is the policy of the MWU/OPTI that all of its faculty and trainees follow the Clinical Trials Policies of the institution(s) at which the clinical trial will be performed. Program Directors and Directors of Medical Education are responsible for ensuring that no clinical trials are initiated without adherence to the policies of the Participating Partner institution.

Research Facilitation Policy
The Research Facilitation Policy establishes the minimum means by which the MWU/OPTI provides research instruction and facilitation to trainees and faculty mentors.

1. The MWU/OPTI provides lectures, curricula, and handouts.

2. The OGMECs ensure that all training programs deliver a research curriculum and document delivery of research instruction that utilizes a method approved by the OGMECs.

3. The MWU/OPTI generates, maintains, and publishes on its website a list of basic science and clinical faculty research mentors available to provide collaboration or assistance to trainees conducting research projects.

4. The MWU/OPTI offers an annual research competition to encourage trainee research.
   - Research award monies are budgeted for the MWU/OPTI
   - Research proposals are submitted to the regional OGMECs
   - Awardees are selected by an ad hoc committee
   - Two annual awardees receive $1,000 MWU/OPTI in grant funding to complete their research projects
   - Awardees must submit their final papers for publication
   - Awardees are recognized in the MWU/OPTI Research and Scholarly Activity Report and by special presentations as appropriate

Other MWU/OPTI Research-Related Policies
For any research-related policies and procedures not included above, such as those pertaining to the use of animals, radiation safety, biosafety, or similar research activities, the MWU/OPTI defers to the applicable institutional policies in effect at the specific location where the research is performed. Program Directors and Directors of Medical Education are responsible for ensuring that no research is initiated without following all applicable policies of the Participating Partner institution.
POLICY NAME: PUBLICATIONS POLICY

PURPOSE

To ensure that the MWU/OPTI supports, promotes, and facilitates publications in journals from MWU/OPTI community-based residents and faculty

POLICY AND PROCEDURES

The MWU/OPTI, through the Midwestern University Office of Research & Sponsored Programs, provides research assistance and resources directly to the community-based MWU/OPTI faculty and trainees to support, promote, and facilitate the publication in peer review journals and media of scholarly activity and research.

The regional OGMECs compile and monitor training program reports on ongoing and completed research to inform programmatic changes as needed.

To meet its responsibilities under this policy, the Office of Research & Sponsored Programs, either directly or in collaboration with the Midwestern University/OPTI OGMECs:

- Identifies and communicates potential peer review publication venues
- Offers editing and review services for all phases of prepublication writing
- Provides fiscal support for research-associated poster costs
- Recognizes and promotes the research and other scholarly activities of MWU/OPTI trainees and faculty by:
  - Issuing press releases to appropriate and relevant media
  - Publishing articles of recognition in the campus newspaper Vital Signs
  - Publishing announcements of awards, grants, and accomplishments in its monthly eNewsletter
  - Identifying awards, grants, and accomplishments in its quarterly research report
  - Announcing and recognizing awards, grants, and accomplishments at Midwestern University’s annual Dr. Kenneth A. Suarez Research Day held each spring on each campus
### POLICY NAME: RECOGNITION OF TRAINEE RESEARCH ACTIVITIES POLICY

<table>
<thead>
<tr>
<th>POLICY NO.</th>
<th>D-03</th>
</tr>
</thead>
<tbody>
<tr>
<td>APPROVAL DATE:</td>
<td></td>
</tr>
</tbody>
</table>

### PURPOSE

To ensure the MWU/OPTI supports and recognizes trainees who conduct research activities

### POLICY AND PROCEDURES

Midwestern University fulfills its Vision to “Respect, appreciate, and acknowledge the achievements of all members of the academic community” by recognizing the scholarship and service achievements of its faculty, staff, students, trainees, and alumni on an ongoing basis within its academic community. The Midwestern University/OPTI ensures specifically that the scholarly activities and research of trainees are supported and recognized.

1. The Chairs of the regional Osteopathic Graduate Medical Education Committees send congratulatory letters to trainees who have presented cases at national research meetings.

2. All MWU/OPTI trainees are encouraged to participate in Midwestern University’s annual Dr. Kenneth A. Suarez Research Day held in the spring on each campus.

3. The regional OGMEC Chairs ensure that all training programs are invited to the “Introduction to Research” workshop on an annual basis.

4. The regional OGMEC Chairs and ORSP generate a list of basic sciences and clinical faculty research mentors available to provide collaboration or assistance to trainees conducting research projects.
POLICY NAME: RESEARCH EDUCATION AND RESOURCE ASSISTANCE POLICY

POLICY NO. D-04

PURPOSE

To ensure the MWU/OPTI facilitates and provides research education, assistance, and resources directly to trainees and institutions and encourage research to meet specialty college requirements.

POLICY AND PROCEDURES

The Midwestern University Office of Research & Sponsored Programs provides research assistance and resources directly to the MWU/OPTI trainees to meet specialty college requirements. Such assistance shall primarily include:

- Assisting navigation of the Institutional Review Board (IRB) application process and answering IRB-related questions
- Acting as an advocate for statistical assistance
- Organizing research-related training, particularly in understanding the IRB and human subjects research requirements
- Offering videoconferences to deliver educational assistance
- Providing fiscal support for research-associated poster costs

The Office of Research & Sponsored Programs maintains sufficient educational resources to offer direct assistance to trainees.

- Training sessions on clinical research are developed and held semiannually on the Downers Grove and Glendale Campuses of Midwestern University. Evaluations provide assessment for ongoing improvement, attendance is recorded, and copies of presentation materials are provided to attendees.
PURPOSE

To ensure that the MWU/OPTI seeks funding, either externally generated or internally budgeted, to provide OPTI-wide support for its research efforts.

POLICY AND PROCEDURES

Midwestern University provides research and scholarly activity support services to trainees in MWU/OPTI training programs through its Office of Research & Sponsored Programs. Offices established in both campus regions develop initiatives to ensure support for all basic biomedical and clinical research conducted under the auspices of Midwestern University and the Midwestern University/OPTI.

1. “Mini” grants (ranging from $500 to $4,000) to trainees and their faculty mentors when appropriate offset the cost of supplies and laboratory support services for some projects that could not otherwise be undertaken.

2. Research funding is facilitated and expanded by identifying internal and external funding sources, assisting in proposal development, proposal preparation and writing, reviewing and endorsing proposals, negotiating agreements, and interpreting the guidelines of and promoting compliance with external funding agencies and University policies.

3. Budgets include specific support for MWU/OPTI research; fiscal resources are provided directly as needed to trainees and their faculty mentors in support of their research projects to defray the cost of supplies, to hire statistical consultants, to cover poster costs, or to fund other research-related costs.
E. Faculty and Instruction

Policies and Procedures
POLICY NAME: FACULTY AND ADMINISTRATIVE PERSONNEL NONDISCRIMINATION POLICY

PURPOSE

To ensure nondiscrimination by the MWU/OPTI on the basis of race, gender, color, religion, national origin, age, or sexual orientation in the selection of faculty and administrative personnel and to ensure selection occurs in accordance with state and Federal government guidelines and in compliance with the Americans with Disabilities Act.

POLICY

The Midwestern University/OPTI does not discriminate on the basis of race, gender, color, religion, national origin, age, or sexual orientation in the selection of faculty and administrative personnel. MWU/OPTI selects faculty members in accordance with state and Federal government guidelines and in compliance with the Americans with Disabilities Act. Language to this effect is included in all affiliation agreements between the MWU/OPTI and its Participating Partners.

Trainees, faculty, and staff who are employees of Midwestern University are governed by the Human Resources Policies and Procedures published on the University’s Intranet site. These policies are available for review at any time from either on-campus or off-campus locations.
PURPOSE

To ensure that the MWU/OPTI, in conjunction with its COM partners, maintains a system for faculty appointments that recognizes the participation of medical educators in postdoctoral programs.

POLICY AND PROCEDURES

The MWU/OPTI maintains, in conjunction with its COM partners, a system for faculty designation that recognizes the participation of medical educators in postdoctoral programs.

1. DMEs at Participating Partner institutions submit candidates for initial consideration of faculty designation.

2. All members of the MWU/OPTI faculty are screened by their Participating Partner institutions on initial applications and at least annually thereafter for licensure, for any disciplinary actions by licensing boards, or for reports on the National Practitioners Databank (http://www.npdb-hipdb.hrsa.gov).

3. The MWU/OPTI regional OGMECs compile and update databases of approved faculty members.
POLICY NAME: FACULTY DEVELOPMENT POLICY

POLICY NO. E-03

PURPOSE

To provide MWU/OPTI faculty development goals and objectives linked to its Strategic Plan

POLICY AND PROCEDURES

The MWU/OPTI provides faculty development goals and objectives linked to its Strategic Plan.

1. The MWU/OPTI Strategic Plan provides goals and objectives for faculty development that are evaluated annually by the MWU/OPTI Governing Board.

2. Midwestern University/OPTI faculty members are invited to attend Midwestern University-sponsored continuing education programs.
PURPOSE

To implement a faculty evaluation process that measures and assesses the effectiveness of the MWU/OPTI faculty members

POLICY AND PROCEDURES

The MWU/OPTI measures and assesses the effectiveness of the MWU/OPTI faculty members by means of institution-specific faculty evaluation tools.

1. The OGMECs Chairs ensure that each Director of Medical Education or Program Director within their region conducts trainee evaluations of the faculty at least annually.

2. Faculty evaluation processes are reviewed.

3. In the event of unsatisfactory faculty performance records, the respective DMEs are required to develop action plans to remediate substandard faculty performance and submit their improvement plans for approval to the Chair of their respective regional OGMEC.
Midwestern University/Osteopathic Postdoctoral Training Institution

Policy Name: INTEGRATION OF OSTEOPATHIC PRINCIPLES AND PRACTICE POLICY

Policy No. E-05 Approval Date:

Purpose

To ensure that the MWU/OPTI, its Participating Partner institutions, and its designated faculty members integrate osteopathic principles and practice (OPP) into all teaching services as appropriate and to ensure designated faculty are available to teach OPP.

Policy and Procedures

The Midwestern University/OPTI promotes faculty development programs that include knowledge and understanding of osteopathic philosophy, principles and practice, in addition to clinical teaching and evaluation modalities. These programs are offered and delivered under the direction of the Departments of Osteopathic Manipulative Medicine of the Arizona College of Osteopathic Medicine and the Chicago College of Osteopathic Medicine, and they are linked to the MWU/OPTI Strategic Plan for ongoing focus on advancing OPP integration within training programs.

1. Participating Partners are required to identify faculty members to serve as designated liaisons for the MWU/OPTI for the specific purpose of supervising OMM instruction and the integration of osteopathic principles and practices into all teaching services as appropriate.

2. A formal curriculum ensures facilitation of the OPP/OMM curriculum at each site.

3. Faculty development programs are delivered through on-campus training programs, clinical site training sessions, and distance learning modules.
F. INTERN AND RESIDENT STATUS AND SERVICES

POLICIES AND PROCEDURES
POLICY NAME: OGMEC PARTICIPATION FROM TRAINEE REPRESENTATIVES POLICY

PURPOSE

To provide trainees with a forum for free and open communication to discuss their training and welfare concerns.

POLICY AND PROCEDURES

The MWU/OPTI provides trainees with a forum for free and open communication to discuss their training and welfare concerns.

1. The regional OGMECs of the MWU/OPTI include representation from trainees.

2. Trainee representative members communicate freely and openly during regional OGMEC meetings.

3. Trainee representative OGMEC members discuss training or welfare concerns during regional OGMEC meetings.

4. Trainees participate in a free forum for communication with OGMEC representatives.
PURPOSE

To ensure all Participating Partner training programs comply with specific resident selection and transfer policies and procedures in the AOA’s Basic Documents for Postdoctoral Training.

POLICY AND PROCEDURES

The MWU/OPTI ensures all Participating Partner training programs comply with specific resident selection and transfer policies and procedures in the AOA’s OPTI Basic Documents for Postdoctoral Training. All Participating Partner training programs must comply with the current AOA guidelines for selection and transfer of trainees.

- The OGMECs annually review resident manuals, web sites, and other published materials to document that every Participating Partner training program has adopted and implemented approved selection and transfer policies.
POLICY NAME:  Trainee Evaluation Policy

PURPOSE

To establish a trainee evaluation process that measures and documents progress toward completion of the training program, including completion of the AOA Core Competencies.

POLICY AND PROCEDURES

The MWU/OPTI trainee evaluation process measures and documents progress toward completion of the training program and ensures evaluation and completion of the AOA Core Competencies.

1. To ensure that performance is evaluated based on the AOA Core Competencies, the regional OGMEC Program Offices maintain files for each Participating Partner training program’s evaluation process that include, but are not limited to, descriptions of trainee evaluation tool(s).

2. The regional OGMECs verify during on-site visits that trainee evaluations are based on the AOA Core Competencies.

3. Each regional OGMEC Program Office maintains separate databases of trainees and tracks their advancement through the training programs:
   - Databases track trainees by AOA number, start date, and expected completion date
   - The MWU/OPTI requires all training programs to validate annually the accuracy of the trainee database
   - Directors of Medical Education must report to the regional OGMEC Program Office the COMLEX Level 3 test dates and scores for every trainee; successful completion of COMLEX 3 must be verified for all trainees prior to their advancement to the OGME-3 year
   - Directors of Medical Education report to their regional OGMEC Program Office any instances in which trainees are delayed for academic reasons in advancing to the next OGME level or to program completion, and they develop individual remediation plans for trainees who fail to meet performance expectations.
Policy Name: Work Hour Compliance Policy

Purpose

To establish the MWU/OPTI process to monitor compliance with work hour policies at all Participating Partner institutions.

Policy and Procedures

The MWU/OPTI monitors compliance with work hour policies at all Participating Partner institutions.

1. The OGMECs ensure that all Participating Partner institutions publish clear work hour policies that comply with current AOA regulations related to work hour limitations.

2. The OGMECs verify that all trainee attestations for work hour compliance have been completed at Participating Partner institutions.

3. The OGMECs document that all Participating Partner training programs have disseminated the AOA Work Hours Violation Hotline information including web site and telephone number. This information must include a statement that all reporting is immune from reprisal.
G. Curriculum

Policies and Procedures
POLICY NAME: NEW PROGRAM DEVELOPMENT POLICY

POLICY NO. G-01

PURPOSE

To effect MWU/OPTI assistance in the development of new osteopathic programs in member institutions including but not limited to completion of program descriptions, development of goal and objective-based curricula, and completion of required AOA accreditation documentation.

POLICY AND PROCEDURES

The Midwestern University/OPTI develops and evaluates new graduate medical education opportunities and programs for its member COMs. Congruent with the AOA’s guidelines to “embrace the educational continuum,” the MWU/OPTI develops and contracts for sufficient and appropriate affiliations necessary to provide high quality postdoctoral education and training at the internship and residency levels. This educational continuum is an integral component of Midwestern University’s Vision of providing lifelong learning initiatives.

The Midwestern University/OPTI is committed to continuing its expansion and development of training programs in rural and urban Arizona and the Western locales, throughout the Chicago metropolitan area, and extending into Indiana and other Midwest sites. It focuses on developing multiple programs with multiple sites.

1. The MWU/OPTI Accreditation Committee monitors development of new training programs and approves new program development plans, including institutional and faculty requirement reviews, curricula reviews, and provision of pro forma assistance.

2. The MWU/OPTI Executive Director/Chief Academic Officer coordinates programs, faculty physicians, and support teams at each of the campuses to identify, evaluate, and coordinate current and new training opportunities and to assist with the development and launch of new programs. The MWU/OPTI additionally provides comprehensive assistance for its prospective members as they complete the required AOA accreditation documentation, including program descriptions and development of goals and educational objectives based on specialty college curricula guidelines.

3. The Chairs of the regional OGMECs provide developmental assistance to new programs.

4. Collaborative development teams visit new program sites to facilitate creation of the administrative systems required for effective program management.
5. New program assistance minimally includes assistance with institutional requirements mandated by the AOA *Basic Standards* for faculty, resident, curricula, budgetary, and financial requirements.
POLICY NAME: OGMEMC CORE COMPETENCY COMPLIANCE POLICY

POLICY NO. G-02

PURPOSE

To establish procedures that ensure all Participating Partner institutions and programs integrate the AOA Core Competencies into their training and evaluations

POLICY AND PROCEDURES

The MWU/OPTI establishes procedures to ensure that all Participating Partner institutions and programs integrate the AOA Core Competencies into their training and evaluations.

1. The regional OGMEMCs maintain repository files consisting of active Institutional Core Competency Compliance Plans (ICCPs) for each Participating Partner.

2. The regional OGMEMCs vote to accept or require modifications for improvement in ICCPs.

3. Once approved, ICCP annual reports are collected and maintained for review in the MWU/OPTI Program Offices.
PURPOSE

To establish the procedures by which the MWU/OPTI reviews and assures compliance with program objectives and basic standards in the curricula of Participating Partner training programs.

POLICY AND PROCEDURES

The MWU/OPTI establishes procedures by which the OGMECs review and approve the curricula of Participating Partner training programs.

1. The OGMECs require that every training program within their respective region clearly identifies its curriculum.

2. Subsequent changes to curricula are approved by the OGMECs.

3. Programs cited as deficient in an area of curriculum by a specialty college inspection must generate an approved Corrective Action Plan.
PURPOSE

- To ensure that the MWU/OPTI monitors compliance with the Internal Review process requirements at each of its Participating Partner institutions

- To establish the procedures by which the OGMECs verify that Participating Partner training programs undergo midcycle Internal Reviews

POLICY AND PROCEDURES

The MWU/OPTI monitors compliance with the Internal Review process requirements at each of its Participating Partner institutions and establishes procedures by which the regional OGMECs verify midcycle Internal Reviews undertaken by their respective Participating Partner institutions.

1. A master schedule generated by the regional OGMECs includes all program accreditation dates and their expected year of midcycle review. The schedule is provided for review on a regular basis to the MWU/OPTI Accreditation Committee.

2. The regional OGMEC Chairs or their designees are available upon request to serve on Internal Review Committees.

3. The OGMECs obtain from the DMEs of Participating Partner institutions written verifications of completion that include the date of review, the Internal Review Committee membership, and the date of approval by the institution’s Graduate Medical Education Committee. All written Internal Review verification reports are maintained in the MWU/OPTI Program Offices.

4. The regional OGMEC Chairs monitor and review compliance to ensure completion of the Internal Review process.
POLICY NAME:  PROGRAM ACCREDITATION ASSISTANCE POLICY

PURPOSE

To establish the procedures for the OGMEC Chairs to provide assistance to any Participating Partner training program that receives less than three years accreditation approval from a specialty college inspection.

POLICY AND PROCEDURES

The MWU/OPTI designates OGMECs Chairs to assist any Participating Partner training program that receives less than three years accreditation approval from a specialty college inspection.

1. Following receipt of less than three years of accreditation by a program, the Chair of the OGMEC assists the program in preparation for the next accreditation inspection.

2. The Chair of the regional OGMEC, in coordination with the DME and the Program Director of the appropriate specialty training program of the Participating Partner institution, reviews all documentation compiled in preparation for specialty college inspections.

3. The Chair of the regional OGMEC or designee assists with the midcycle Internal Review and provides an inspection preparation plan, including assistance with the specialty college Workbook, prior to the scheduled specialty college inspections of Participating Partner training programs. An internal accreditation crosswalk is generated to assist the Chairs and Program Directors to identify potential deficiencies prior to the inspection and develop advance Corrective Action Plans to ensure compliance with AOA Standards.
POLICY NAME: TRAINING SITES NOT OWNED OR OPERATED BY THE MWU/OPTI POLICY

PURPOSE

To empower the MWU/OPTI Participating Partners to offer a portion of their postdoctoral curriculum at sites not owned or operated by the MWU/OPTI member or its affiliated institutions.

POLICY

The Midwestern University/OPTI does not own or operate any of its OPTI training sites. To meet the organization’s trainee educational requirements, Program Directors determine which rotations are needed and which sites best meet the training requirements for their program and specialty college. Program Directors subsequently arrange for execution of the necessary signed affiliation agreements with those training sites. Affiliation agreements for all training that occurs outside of the Participating Partner institutions are reviewed by the regional OGMEC Chairs during on-site visits.
H. Facilities

Policies and Procedures
POLICY NAME: LIBRARY POLICY

PURPOSE

To ensure that the MWU/OPTI provides full library access to print or electronic learning resources at all times to all trainees at each training program site

POLICY AND PROCEDURES

Midwestern University library services are available to all MWU/OPTI trainees, who have 24-hour remote access to the library’s electronic books, journals, and databases. On an annual basis, the MWU/OPTI Program Offices provide the library with a list of trainees to ensure ID and password distribution to all trainees participating in the MWU/OPTI training programs.

1. Trainees may request library services in person, via phone, e-mail, and forms on the library web site at [http://mwunet.midwestern.edu/Library/index.htm](http://mwunet.midwestern.edu/Library/index.htm). University library services include interlibrary loans, references, database searches, formal and informal instructional programs in the use of print and electronic resources, circulation, outreach, faculty liaison, and marketing of library resources. Through direct collaboration with individual faculty members, library instruction is integrated into the MWU/OPTI educational experience whenever possible and available on request as needed.

2. For trainees located in hospitals and other training sites without on-site library facilities, Midwestern University is the primary provider of library resources and services. Many MWU/OPTI Associate members offer on-site libraries with a full range of library staff, services, and print and electronic resources, and availability to their trainees is equal to physicians with medical staff privileges. Trainees in these locations rely primarily on the greater convenience inherent in the close proximity of their local library, although Midwestern University libraries provide backup resources and services as needed.
**POLICY NAME:**  PROVISION OF LEARNING RESOURCES  POLICY  

**POLICY NO.**  H-02  

**APPRAVAL DATE:**

**PURPOSE**

To ensure the MWU/OPTI provides access to appropriate learning resources necessary for the delivery of the postdoctoral curricula, a library containing a wide selection of modern textbooks and current periodicals, either in printed or digital format applicable to the medical services rendered by the MWU/OPTI, under the supervision of a professionally trained librarian.

**POLICY**

The MWU/OPTI provides access to appropriate learning resources necessary for the delivery of the postdoctoral curricula by authorizing representatives of the MWU/OPTI to conduct site surveys that include assessment of the learning resources of Participating Partner institutions on a semiannual basis to identify and to meet all learning resource needs.

At a minimum, semiannual site visits include inspection of libraries, their contents, and related modalities for trainee access and study.