

POST OFFICE BOX 9990
MILLS COLLEGE
OAKLAND, CA 94613-0990
(510)632-5000
Fax: (510)632-8361
E-mail: wascsr@wasc.mills.edu



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March 11, 1996

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Philip Pumerantz
President
College of Osteopathic Medicine of the Pacific
309 East Second Street
College Plaza
Pomona, CA 91766-1889

Dear President Pumerantz:

At its February 27, 1996 meeting the Commission reviewed the report of the most recent visiting team to the College as well as the self study prepared by the College in anticipation of the visit and your letter of February 5, 1996, responding to the team's report. The Commission appreciated your participation in its discussions along with Warren Lawless, Don Krpan, Stuart Wiener, Ted Wendel, Jim May, and Beverly Guidry.

The Commission was pleased to note the team's finding that:

"The College of Osteopathic Medicine of the Pacific deserves commendation for the attention it has given to previous team visit recommendations and the progress that it has made in moving towards WASC accreditation. The quality of its graduates from all programs is generally impressive as are its facilities. The team strongly compliments all elements of the campus for the excellent academic and service commitment that each has made to its student body. As one student indicated, 'Everyone here wants you to succeed.' Generally, there is a 'can do,' entrepreneurial spirit associated with much of the campus."

The College should be proud of its many achievements. Founding a new institution of higher education and bringing it to its current level of effectiveness and financial strength is a source of pride for all members of the College community. In particular, the

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Commission congratulates you on the commitment and dynamic leadership that you have brought to the College during the past 20 years.

Both the institution's self study and the visiting team report indicate areas of concern. The visiting team report suggests that the drive for growth and expansion has exacted a significant price in terms of internal communication, due process, and careful consultation on matters that directly affect academic quality. The following constitute the Commission's most serious concerns at this time:

1. The visiting team found that:

"Faculty staffing seems barely adequate and is causing pressure points of concern for all programs. The need to expand the size of its overall core on-campus faculty is acknowledged by the institution in its Self Study. The growth being experienced and forecast will create serious faculty workloads which will be compounded to the extent that COMP enhances the role of research/scholarly activity on campus."

Given the graduate nature of the College, it is troubling to note the finding of the self study that "In reality, few of COMP's faculty have shown an inclination to become involved in research or scholarly activity." The Commission understands that you expect scholarly effort to focus on pedagogical issues. It is essential that the College make progress in demonstrating greater faculty engagement in such endeavors.

Without a faculty workload policy, it is difficult to reach any valid conclusions about the adequacy of the current faculty or of plans for the future. The impasse has been allowed to continue for several years without the Board, the administration and the faculty coming to a satisfactory conclusion. The Commission was gratified to learn that the Faculty Council is identifying an outside consultant to assist in the formulation of a faculty workload statement. In view of COMP's stated intention to become the Western University of Health Sciences, the decision on faculty workload must address forthrightly the need for scholarly and research activity and will, necessarily, have far-reaching implications for the future of the institution and its resource needs. The Commission urges that this fundamental policy matter be given high priority in the deliberations of the Board, the faculty and the newly formed National Board of Visitors in coming months.

2. The team found that "Laboratories seemed sparsely equipped and computing hardware and software continue to need systematic, but aggressive attention over the next several years." Your letter of February 5 disputes the team finding on this issue. It would be appropriate for the College to arrange for an evaluation of the adequacy of laboratory equipment by an independent panel of experts from comparable health science institutions.

3. The team report suggests that the library is not adequately meeting the service needs of students and that "While the current staff is knowledgeable and strives to meet service expectations, they are stretched too thin." Further, the team reports, ". . . that the D.O. program provides no instruction in library use. For the first two years of the program, the students rely almost entirely on faculty generated course lecture material and have little need or inclination to supplement this material from other sources."

The team reported recent cuts in the library budget and the consequent necessity of canceling subscriptions to several basic science journals. Your letter of February 5 states that, while the budget for periodicals has been reduced, that the overall budget for the library has increased. The team report also suggests that the thinness of library staffing may be part of a larger picture of inadequate staffing throughout the College. The Commission wishes to stress the need to invest library resources in such a way as to meet the library requirements of the future, not just to recreate past library practices.

4. While the College has made strides in upgrading the sites for clinical practice in the Doctor of Osteopathy program, the team recommends additional reductions "to a level that permits sound management and staffing regarding a quality learning experience or provide additional site management resources to insure a consistency in the quality of the clinical learning experience."

5. There are important gaps with respect to certain institutional policies and procedures. There is no policy governing staff grievances. The visiting team raises important questions as to whether the faculty grievance policy provides an adequate opportunity for review of the substance of faculty grievances. There is no policy assuring regular evaluation of the chief executive officer. The team report also raises questions about the basis upon which faculty decisions regarding dismissal of students for academic cause have been overridden. While the Board must maintain final

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authority with respect to such decisions, the policy governing such decisions should be established and the grounds for overriding faculty recommendations made clear.

The Commission recognizes the considerable strengths of the College and your impressive record of success in preparing well-qualified graduates. The Commission acted to:

1. Grant accreditation to the College;
2. Schedule the next comprehensive visit in the fall of 2000; and
3. Request a written progress report by March 15, 1998, with respect to the five issues highlighted in this letter.

Accreditation status is not granted retroactively. Institutions granted the status of accreditation must use the following statement if they wish to describe the status publicly:

"(Name of institution) is accredited by the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges, an institutional accrediting body recognized by the Commission on Recognition of Postsecondary Accreditation and the U.S. Department of Education."

The phrase "fully accredited" is to be avoided, since no partial accreditation is possible. The accredited status of a program should not be misrepresented. The accreditation granted by an institutional accrediting body such as the Commission has reference to the quality of the *institution as a whole*. Since institutional accreditation does not imply specific accreditation of any particular program in the institution, statements like "this program is accredited" or "this degree is accredited," are incorrect and misleading.

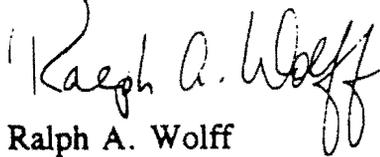
On a separate matter, the team reports that COMP's Doctor of Pharmacy degree will require a minimum of 60 units of selected undergraduate courses for admission but will not require the baccalaureate degree. This admission standard violates Standard 4.C.4. The Commission recognizes that this issue also involves the admissions practices of other institutions accredited by the Commission that offer or plan to offer the Doctor of Pharmacy degree. The Commission will convene a meeting of

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representatives from such institutions during the coming year in an effort to resolve this issue.

We hope that the achievements of the College will serve as a continuing source of pride to all members of your College community.

Sincerely,

A handwritten signature in cursive script that reads "Ralph A. Wolff". The signature is written in dark ink and is positioned above the typed name.

Ralph A. Wolff
Executive Director

RW:dma

cc: David Winter
Carl Trinca
Members of the Team