

APPROVED
January 22, 2025

Melissa Bealon
Board Secretary Melissa Bealon

Item #F-3
January 22, 2025

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY
FOR INDEPENDENT INSTITUTIONS**

Submitted for: Action.

Summary: New independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of the original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions are also required to obtain authorization for each new degree program.

Action Requested: That the Illinois Board of Higher Education approves the recommendations to grant degree-granting authority and/or operating authority to the following institution:

Private Not-For-Profit

The Chicago School

- Doctor of Osteopathic Medicine in the Chicago Region

STATE OF ILLINOIS
BOARD OF HIGHER EDUCATION

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY
FOR INDEPENDENT INSTITUTIONS**

The Illinois Board of Higher Education (IBHE) has responsibility for administration of The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010). Under these statutes, new independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions also are required to obtain authorization for each new degree program.

Applications for new operating and degree-granting authority submitted by independent Illinois institutions and out-of-state institutions are reviewed by staff. Recommendations are developed by applying criteria for operating and/or degree-granting authority, which are defined in the rules adopted for administration of the statutes and Board policies on assessment of student learning and specialized accreditation requirements for student licensure. These criteria encompass educational objectives, institution and degree titles, curricula, facilities, faculty and administrator qualifications, student policies, publications, records, compliance with pertinent laws, and fiscal stability. Staff recommendations are based on analyses of application materials, responses to questions, and site visits. Out-of-region sites are defined as sites located within an IBHE approval region other than the region within which an institution's original operating authority was granted. There are ten IBHE approval regions; each is coterminous with one or more community college districts. Approval to operate within a new approval region entitles an institution to operate throughout the region, and not solely at the site at which the institution initially applied. In addition to the approval criteria in rules, each new program was reviewed for its contributions to the goals of *A Thriving Illinois: Higher Education Pathways to Equity, Sustainability, and Growth*, which sets forth new priorities to guide Illinois higher education.

This item includes recommendations to grant degree-granting authority to one institution.

Private Not-For-Profit Executive Summary

The Chicago School

- Doctor of Osteopathic Medicine in the Chicago Region

The Chicago School (the University) is seeking authorization to offer a Doctor of Osteopathic Medicine (DO) in the Chicago Region. The 184-credit hour program will be housed in The Chicago School's new Illinois College of Osteopathic Medicine (IllinoisCOM), a proposed medical school that aims to train osteopathic physicians to provide individualized care rooted in the connection between mental and physical well-being. The DO program incorporates a wellness and holistic approach to the practice of medicine addressing both physical and mental health. The proposed program will complement and expand on the expertise and mission of The Chicago School in preparing students

for careers in osteopathic medicine at healthcare organizations across the country and thus address the physician shortage looming in the years ahead. Exam support services and resources will be provided to aid students in successfully passing the Comprehensive Osteopathic Medical Licensing Examination (COMLEX-USA), a three-level national standardized licensure examination that assesses osteopathic medical knowledge, knowledge fluency, clinical skills, and other competencies essential for practice as an osteopathic generalist physician. The program will be accredited by the Commission on Osteopathic College Accreditation (COCA) upon meeting eligibility requirements. The Chicago School has developed campuswide initiatives to systemically close persisting equity and opportunity gaps in student outcomes and faculty hiring. There are policies in place to ensure faculty possess the training, credentials, and qualifications to provide instruction in the proposed program. The Chicago School has sufficient library, technology, and financial resources to support the program.

Approval request summary, including staff conclusion, follows in Attachment A.

The staff recommends adoption of the following resolutions:

The Illinois Board of Higher Education hereby grants to The Chicago School authorization to grant the Doctor of Osteopathic Medicine in the Chicago Region, subject to the institution's implementation and maintenance of the conditions that were presented in its application and that form the basis upon which this authorization is granted.

The Chicago School
325 North Wells Street
Chicago, IL 60654
President: Dr. Michele Nealon

Proposed Program Title in the Region of Authorization: Doctor of Osteopathic Medicine in the Chicago Region

Projected Enrollments and Degrees

First Year Enrollment	Fifth Year Enrollment	Degrees Awarded Fifth Year
85	610	78

Institutional Accreditation: The Chicago School is accredited by the Western Association of Schools and Colleges Senior College and University Commission.

Background and History

Since its founding in 1979, The Chicago School (the University) has provided a practical and solutions-oriented education preparing culturally competent graduates with the skills to improve the health of individuals, organizations, and communities. Building on its commitment to advance the connection between mental and physical health, The Chicago School endeavors to integrate physical and mental health by opening a new medical school, the Illinois College of Osteopathic Medicine (IllinoisCOM), to train osteopathic physicians to provide whole-person care. As such, The Chicago School is seeking authorization to offer a Doctor of Osteopathic Medicine (DO) in the Chicago Region. The proposed program will be housed in IllinoisCOM which will build a pipeline of uniquely qualified physicians to provide integrated, individualized care to patients. This holistic approach to medical education will lead to more well-rounded healthcare professionals who are equipped to address the complex health challenges of modern society. By co-locating and co-educating psychologists and physicians, The Chicago School offers a distinctive approach to medical education.

The Doctor of Osteopathic Medicine is a 184-credit hour competency-based osteopathic medical education program designed to prepare students for internships and residencies as practicing osteopathic physicians. Osteopathic medicine is distinct in its whole-person approach which entails partnering with patients while considering the connection of body, mind, and spirit in delivering care and recognizing the role of a physician's hands to diagnose and treat illness or injury. Emphasis on prevention and wellness is central in osteopathic medicine that promotes the body's natural tendency toward health and self-healing. As medicine has changed and improved over the years, so has the practice of osteopathic medicine. DOs practice in the full range of specialties but often concentrate on primary care and are trained to actively listen and communicate with their patients to determine the best methods of care and treatment. According to the Association of American Medical Colleges (AAMC), the United States will face a physician shortage of up to 86,000 physicians by 2036. The proposed DO program will address workforce needs in osteopathic medicine and contribute significantly to broader societal needs, including cultural enrichment, lifelong learning opportunities for Illinois residents, and enhanced civic participation. By combining osteopathic medicine with psychology, the program fosters a more comprehensive understanding of human health and behavior. This interdisciplinary approach will enrich the cultural discourse surrounding healthcare, mental health, and overall well-being.

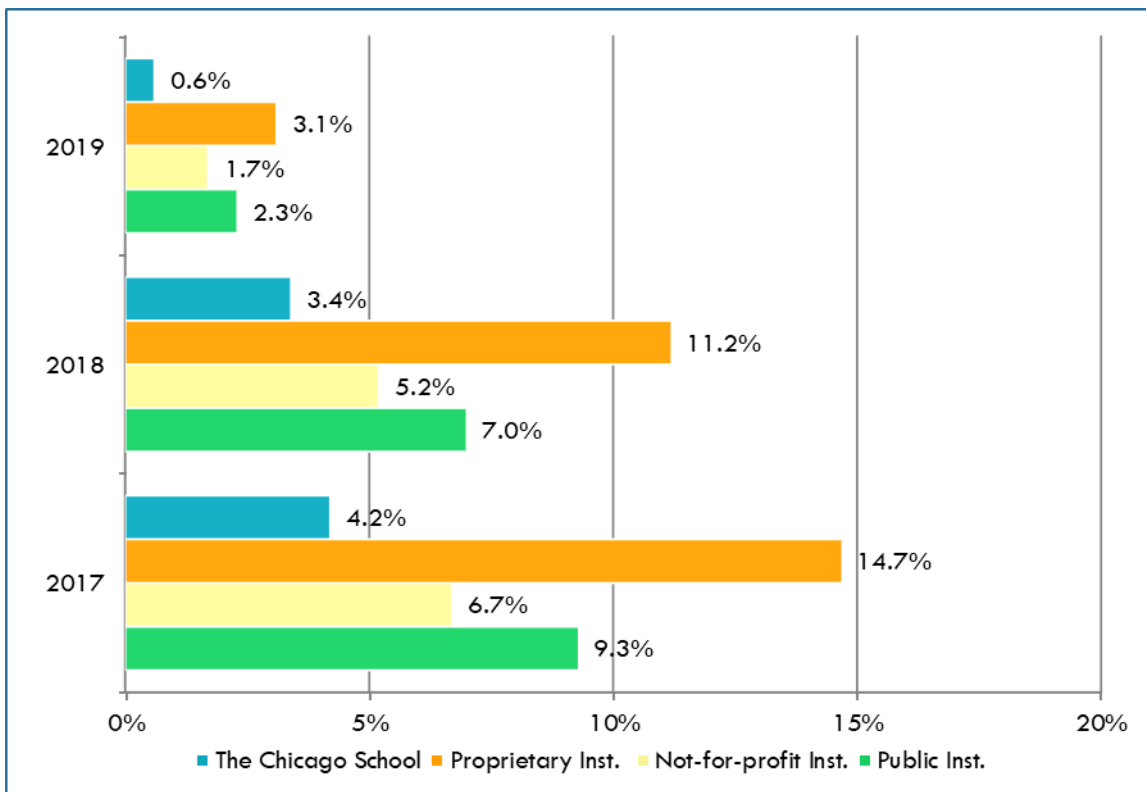
Institutional Data

1030.30(a)(3)(F): Success in student progression and graduation across all existing approved programs, and success rates in programs preparing students for certification and licensure, shall be consistent with expectations in higher education and the appropriate related field of study. At a minimum, the Board shall consider the following factors, based on results for similar institutions: (i) Graduation rates, certificate and degree completion rates, retention rates, and pass rates for licensure and certification aligned with thresholds set by State or national regulatory bodies; and (ii) Success rate, which shall be, at a minimum, higher than that of the lowest quartile of these measures for similar Illinois institutions defined as open versus competitive enrollment institutions and primarily associate versus primarily baccalaureate granting institutions. Exceptions may be made to the lowest quartile if an institution is above the national average for these measures using the same comparison categories of institutions.

1030.30(a)(3)(G): Additional student success measures shall be considered in the review of applications for authorization. The Board shall establish minimum rates of success based on results for similar institutions or thresholds set by State or federal regulatory bodies. i) At a minimum these data shall include student loan default rates, student indebtedness rates, job placement rates, student learning measures and other success indicators. ii) Institutions that participate in Federal Student Loan programs shall have 3-year Official Cohort Default rates no higher than 25 percent. Institutions with Federal Financial Responsibility Composite Scores shall have a score that is no lower than 1.0. Institutions that fail to meet these thresholds may be restricted from implementing new certificate or degree programs. iii) The success rate shall be, at a minimum, higher than that of the lowest quartile of these measures for similar Illinois institutions defined as open versus competitive enrollment institutions and primarily associate versus primarily baccalaureate granting institutions. Exceptions may be made to the lowest quartile if an institution is above the national average for these measures using the same comparison categories of institutions.

This section includes information about institutional and student success measures for The Chicago School. The institution's rates will be compared to Illinois institutions from within a select comparison group and against the national standards or averages. For a proposed undergraduate program, this section will include undergraduate graduation rates, first to second year retention rates, student loan default rates, and any applicable licensure passage rates. For a proposed graduate program, this section will primarily focus on student loan default data since this measure also includes graduate students in the calculation.

Three-Year Cohort Student Loan Default Rate



Source: National Center for Education Statistics (NCES), US Department of Education

Note: Due to the pause on federal student loan payment that began in March 2020, the cohort default rate for fiscal year 2020 is zero percent for the institution and all institution types. The national cohort default rate for fiscal year 2019 was 2.3 percent and zero percent for fiscal years 2020 and 2021.

A lower number is a positive indicator.

The three-year cohort student loan default rate is the percentage of a school's borrowers who enter repayment on certain Federal Loan Programs during a particular federal fiscal year, October 1 to September 30, and default or meet other specified conditions prior to the end of the second following fiscal year.

Need

Public Act 102-1046, 110 ILCS 1005/4, Sec. 4 (7): That the proposed degree program is educationally and economically consistent with the educational priorities and needs of this State and meets a need that is not currently met by existing institutions and is supported by clear evidence of need. If the examination shows that the applicant has such qualifications, a certificate of approval shall be issued.

In March 2023, a cross-functional team including representatives from both The Chicago School and the marketing department of The Community Solution conducted a feasibility study to evaluate the need for osteopathic physicians in the United States. The study revealed a persistent shortage of qualified physicians to meet the nation's healthcare needs. Given these findings, medical education programs are critical in mitigating the projected shortfall of doctors. The U.S. Bureau of Labor Statistics predicts a four percent increase of employment growth for physicians in the next

decade with an average annual salary of \$239,200 (approximately 23,600 physician job openings are projected each year). Osteopathic physicians are particularly in demand given their emphasis on preventive medicine and comprehensive patient care. According to the 2023 Osteopathic Medical Report from the American Osteopathic Association, the osteopathic medical profession is positioned to continue growing exponentially with DOs representing more than 11 percent of all physicians in the United States. In 2023, the total number of osteopathic physicians in the United States reached almost 149,000, a 30 percent increase over the past five years. Over the past three decades, the total number of DOs and osteopathic medical students has more than quadrupled to reach 186,871 in 2023. The proposed DO program at The Chicago School has the potential to not only produce skilled osteopathic physicians but also contribute significantly to addressing the growing need for integrated mental health and primary care. Additionally, with a projected graduation of more than 170 physicians each academic year when fully operational, the DO program will curb the physician shortage in Illinois and surrounding areas.

A Thriving Illinois: Higher Education Paths to Equity, Sustainability, and Growth

Supportive of IBHE's *A Thriving Illinois: Goal 1, Equity, to close equity gaps for students who have historically been left behind*, the proposed program seeks to cultivate pipeline pathways and educational programs to engage diverse students in medicine by streamlining the admissions process for qualified students pursuing careers in osteopathic medicine and providing mentoring opportunities to promote academic success and increase student retention. The Chicago School adheres to an admissions philosophy that fosters diversity within the student body. The University's commitment to holistic admissions practices is grounded in the philosophy of inclusion rather than exclusion. Once students are admitted into the proposed program, The Chicago School's academic and social support structure (e.g., faculty coaches, learning enhancement, and learning communities) will ensure equitable access to success.

Creating an inclusive culture of diverse faculty, staff, and administration is essential to the mission of The Chicago School and the proposed DO program. With an emphasis on belonging as a core value and a commitment to cultural competency, the proposed program will utilize The Chicago School's Diversity Recruitment Strategy Guide in its hiring and recruitment efforts to foster an inclusive work environment. Moreover, in furthering The Chicago School's commitment to equitable and inclusive learning and working environments for students and employees, the University is launching an Inclusion, Diversity, Equity, and Access (IDEA) office and hiring an executive director to serve as the foundational diversity officer. The office is an evolution of The Chicago School's longstanding structures, resources, and services to meet the IDEA needs of the campus community. Once launched, the Office of IDEA will provide strategic direction for diversity-related efforts for the University, including the proposed DO program. The Office of IDEA will support the recruitment, retention, and success of the University's diverse students, faculty, and staff; enhance and affirm ethical and cultural values; promote equitable treatment for members of underrepresented groups; and foster a climate of inclusion.

In alignment with *A Thriving Illinois: Goal 2, Sustainability, to build a stronger financial future for individuals and institutions by finding ways to reduce the financial burden of education on students and their families*, The Chicago School will continue its efforts to increase college affordability for all students, especially those from historically underserved backgrounds, by focusing on three main areas: cost management, non-tuition revenue generation, and direct financial aid. For cost management, the University is managing its operational costs to keep tuition rates competitive by implementing hybrid learning models that incorporate online and in-person instruction; optimizing

space and resource utilization through flexible learning options; utilizing simulation technology; reducing costs associated with physical equipment, cadavers, and storage; leveraging shared University resources such as information technology, financial aid, student support, career services, and registrar functions; sharing spaces including The Chicago School's integrated library system; and negotiating better pricing with vendors for facilities, supplies, and services.

To supplement tuition income and provide additional financial support to students, The Chicago School is implementing an advancement strategy focused on seeking donations and grants specifically earmarked for student scholarships. Additionally, the University is prioritizing financial support for students from historically underserved backgrounds and pursuing donations and grants to cover facilities-related expenses and equipment costs. Furthermore, The Chicago School is committed to offering direct financial assistance to students through institutional scholarships to offset tuition costs, designing scholarship programs that target historically underserved student populations, expanding Federal Work-Study positions to provide students with income while gaining valuable work experience, and creating additional College Work-Study positions to supplement Federal Work-Study and provide more students with on-campus employment options. The Chicago School aims to continuously evaluate and improve these initiatives to meet the evolving needs of the student body.

The proposed DO program will contribute to *A Thriving Illinois: Goal 3, Growth, to increase talent and innovation to drive economic growth*. The program was designed to stimulate economic growth in Illinois through strategic engagement with business and industry partners along with producing highly skilled osteopathic physicians to meet evolving healthcare needs of the region. As part of the development process for the DO program, leaders from The Chicago School have been actively engaging key stakeholders in the community. To date, The Chicago School has met with more than 100 stakeholders to support the new Illinois College of Osteopathic Medicine and the proposed DO program. In addition, to become accredited by COCA, the DO program must demonstrate support from hospitals and healthcare organizations by securing commitments from these entities to support clinical training and education opportunities for students. Currently, a dozen hospitals and healthcare organizations have signed memorandums of understanding with The Chicago School articulating their commitment to support the development of the proposed DO program and providing clinical education opportunities in the future. By leveraging these partnerships and focusing on the unique aspects of osteopathic medicine, the proposed program is well-positioned to make a significant contribution to the state's economy while addressing critical healthcare needs and disparities.

Comparable Programs in Illinois

Presently, there are two institutions with comparable Doctor of Osteopathic Medicine programs in Illinois (one out-of-state institution and one independent, not-for-profit institution). The proposed program is distinct in its focus on a holistic, patient-centered approach to healthcare, which aligns with The Chicago School's emphasis on behavioral health. The program's curriculum, with its emphasis on interdisciplinary research, was developed in consultation with industry partners to ensure graduates possess the skills and knowledge required by healthcare employers in the region. The program will also provide students with a unique training model featuring hubs in various metropolitan areas throughout the country. By integrating interprofessional education throughout the curriculum, the DO program will develop the essential Interprofessional Education Collaborative (IPEC) core competencies in its osteopathic medical students for effective collaborative practice to meet growing labor needs for skilled physicians with expertise in osteopathic medicine.

Comparable Programs Doctor of Osteopathic Medicine			
Institution	Degree	Region	Sector
A.T. Still University	Doctor of Osteopathic Medicine	Chicago Southwestern	Out of State
Midwestern University	Doctor of Osteopathic Medicine	West Suburban	Independent, Not-for-profit

Source: IBHE Program Inventory

Mission and Objectives

Criterion 1030.60(a)(1) provides that the objectives of the degree program(s) must be consistent with what the degree program title(s) imply.

Criterion 1030.60(a)(2) provides that the requested degree program shall be congruent with the purpose, goals, objectives and mission of the institution.

The Chicago School's mission is to educate the next generation of changemakers in innovative theory and culturally competent practice to strengthen the integrated health of individuals, organizations, and communities. Supportive of this mission, the new Illinois College of Osteopathic Medicine and the proposed DO program seek to train exceptional healthcare leaders to leverage the interconnection of physical and mental health in providing compassionate, patient-centered care of the highest quality.

Curriculum/Assessment

1030.30(a)(3): The caliber and content of each course or program of instruction, training or study shall be reasonable and adequate for achieving the stated objectives for which the course or program is offered. An undergraduate curriculum shall include general education in alignment with the degree level and objectives.

1030.60(a)(4): The caliber and content of the curriculum shall assure that the stated certificate or degree objectives for which the program is offered will be achieved.

Admission Requirements

Students interested in the proposed DO program must meet the minimum admission requirements of the Illinois College of Osteopathic Medicine. Admission to the proposed IllinoisCOM is open to students with a bachelor's degree from an accredited institution. Exceptions are occasionally made for exceptional candidates from partner program institutions that have completed a standardized program of study that aligns with IllinoisCOM's matriculation requirements. Applicants must submit official MCAT scores, completed within three years of matriculation. While higher MCAT scores are more competitive, a minimum score of 500 is recommended. Additionally, applicants must be a U.S. citizen or permanent resident of the U.S., able to meet the published IllinoisCOM Technical Standards, and have a GPA of 3.0 on a 4.0 scale with a minimum of 3.3 in STEM subjects. IllinoisCOM refers to the American Association of Colleges of Osteopathic Medicine Application Service (AACOMAS) designation in determining STEM GPA.

Applicants must possess the academic background, personal fortitude, and capacity for growth necessary to succeed in an integrated and rigorous program curriculum. The admissions process includes a holistic review by the admissions committee. The Chicago School is committed to reviewing all applicants through a fair and transparent process assessing each individual's preparedness on the basis of the totality of evidence submitted. In addition to considering such traditional factors in admissions (e.g., GPA, standardized test scores, and essays), the admissions committee considers an applicant's previous life and professional experiences, community service activities, and interests in the provision of professional services to neglected and marginalized populations.

Curriculum

The proposed Doctor of Osteopathic Medicine program emphasizes an integrative approach to healthcare and explores the intersection of mental and physical health, preparing osteopathic physicians to provide whole-person care. The 184-credit hour program will feature a unique curriculum grounded in IPEC core competencies to prepare DO students to work collaboratively on healthcare teams. The longitudinal patient-centered osteopathic practice course series that spans all four years provides opportunities for students to apply interprofessional competencies through simulations, case studies, and clinical experiences involving interactions with other healthcare students at The Chicago School and regional affiliates.

Pre-clinical coursework in the proposed program will provide students with foundational medical knowledge, learning experiences, and assessments that facilitate culturally competent medical practice by investigating how implicit biases, healthcare teams and systems, and social determinants can impact holistic patient care and interprofessional practice. Students will use medical literature to research each patient's history, signs, and symptoms as well as cultural and societal factors to develop a comprehensive understanding of the patient and to further develop an appropriate treatment and management plan. During the clinical sequence of the program, all core and required clerkships are designed with clinical partners to integrate students into the interprofessional healthcare team. Specifically, the required Behavioral Health clerkship affords students the opportunity to learn from allied mental health professionals about their role in providing comprehensive mental healthcare as part of an interprofessional healthcare team.

Throughout the program, students will expand their basic biomedical knowledge and informational literacy while honing their research skills in the context of patient care. The Chicago School has created a culture that supports evidence-based scientific inquiry, provides an infrastructure that supports the research interests and productivity of faculty and students, and supports the professional development of faculty and training of students in research designed to contribute to the growing evidence base for osteopathic manipulative medicine and best practices in medicine. Exam support services and resources will be provided to aid students in successfully passing the Comprehensive Osteopathic Medical Licensing Examination (COMLEX-USA) sequence. The Chicago School is in the process of vetting third-party resources to augment and supplement the curriculum of the DO program. These platforms will offer supplemental content and robust board-style question banks to enhance student success and support the achievement of learning outcomes. Board-style question banks provide a powerful resource to support student learning through the strategic use of formative assessments. This program-wide strategy includes the use of required formative assessments featuring board-style questions and the use of curated, third-party supplemental content to reinforce foundational concepts throughout the pre-clinical and clinical phases of the proposed program. Weekly formative assessments will be integrated into the

curriculum to familiarize students with the exam questions. Furthermore, the National Licensing Exam Policy outlines expectations surrounding minimum performance standards on qualifying assessments prior to sitting for the COMLEX-USA. Failure to meet these standards results in additional structured remediation requirements to support success on licensing exams.

All core faculty receive professional development to implement an individual approach to student academic support through an academic coaching model to augment the formal student support advising and informal mentorship that occurs in medical education. Academic coaches assist learners in identifying goals, cultivating a personalized strategy to actualize those goals, and developing skills of self-management and self-reflection. Academic coaches work collaboratively with the student, their mentor(s), student support advisors, and other student success stakeholders to provide a coordinated care model that provides an impactful, individualized, efficient, and innovative network of academic support.

Additionally, the proposed DO program will leverage the comprehensive resources and support services available through the Office of Student Support Services of The Chicago School. Student support services are available to all students as they progress through their academic programs from new student orientation through graduation. Every student is partnered with a Student Support Coordinator (SSC), who provides non-academic, operational support. SSCs assist with general questions, connect students to helpful resources, troubleshoot individual challenges, navigate institutional policies and processes, and often provide a listening ear as students pursue their educational goals. The Office of Student Support Services also houses Student Life and Events, Americans with Disabilities Act (ADA) Accommodations, International Student Services, and Military Student Services. Students will have access to a wide range of academic support resources and tools through the Office of Student Writing and Learning (OSWL). OSWL provides writing and academic support services. Learning specialists in OSWL work individually with students to improve their studying, test-taking, time management, and stress management skills. Students can request in-person appointments, asynchronous virtual meetings, or synchronous virtual meetings. Learning specialists also offer larger-group workshops and strategies for board exam preparations, remediation, and course success.

Assessment of Student Learning

The proposed DO program is a competency-based osteopathic medical education program designed to equip students with the mission-aligned knowledge, skills, and attitudes necessary for advancing to the postgraduate phase of their osteopathic education. The DO program learning outcomes (PLOs) are closely aligned with the Foundational Core Competencies for Undergraduate Medical Students, a new framework resulting from a multi-year collaborative effort involving the American Association of Colleges of Osteopathic Medicine (AACOM), the Association of American Medical Colleges (AAMC), and the Accreditation Council for Graduate Medical Education (ACGME) along with other national stakeholders. It represents a new standard for undergraduate medical education. The PLOs reflect the proposed program's mission, the national standards for medical education, and key professional competency standards. Student learning will be assessed annually against the following program learning goals and outcomes:

- PLO I: Patient Care – Demonstrate effective patient care that appropriately incorporates osteopathic principles; implements equitable, empathetic, and evidence-based practices; and includes patient education, health promotion and disease prevention.
- PLO II: Medical Knowledge – Demonstrate and apply the knowledge of foundational science and clinical medicine, and do so in an integrated, patient-centered, holistic manner.

- PLO III: System-Based Practice – Demonstrate a functional understanding of healthcare delivery systems and the ability to provide quality patient care within these systems.
- PLO IV: Practice-Based Learning and Improvement – Demonstrate the ability to critically evaluate a clinical problem, formulate appropriate clinical questions, integrate evidence-based practices into patient care, and acquire additional knowledge for lifelong learning to continuously improve patient care and outcomes.
- PLO V: Professionalism – Demonstrate professional behaviors that uphold the expectations of osteopathic medicine, including knowledge, humanistic behaviors, responsiveness to need, accountability, continuous learning, adherence to ethical principles, cultural competency, professional and personal self-care, and honest practices.
- PLO VI: Interpersonal and Communication Skills – Demonstrate the interpersonal and communication skills necessary to establish and maintain positive professional relationships across the healthcare infrastructure.
- PLO VII: Osteopathic Principles and Practices – Develop and demonstrate an approach to patient care based upon the four tenets of osteopathic medicine that applies knowledge of osteopathic manipulative medicine.
- PLO VIII: Integrated Care – Demonstrate the ability to provide patient-centered care that integrates the behavioral health needs of diverse populations across the lifespan.
- PLO IX: Interprofessional Collaborative Practice – Demonstrate the ability to engage in effective interprofessional collaboration, communication, and teamwork with individuals from various healthcare disciplines to provide coordinated, patient-centered care.

Program Assessment

The Chicago School engages in intentional, systematic, and multidimensional efforts to create a supportive educational environment designed to retain all students. The DO program's emphasis on belonging as a core value highlights the importance of cultivating this belonging for all community members, elevating the voices of those historically marginalized within the medical community, and preparing students to ensure every patient and colleague feels seen and heard. As such, the respect for and understanding of cultural and individual diversity is an articulated institutional learning outcome of The Chicago School and is reflected in the programmatic and course learning outcomes of the program. Faculty subject matter experts in conjunction with the curriculum committee will facilitate the evaluation, review, and reflection on the development of students, curriculum, training sites, evaluation processes, and scholarship in diversity-related learning outcomes and related professional competencies.

While the faculty-guided evaluation is ongoing, the continuous quality improvement subcommittee will conduct annual formal program reviews examining student learning outcomes data and recommending program improvements as needed to ensure student success. Student achievement data will be disaggregated by various characteristics (e.g., ethnicity and gender) to identify challenges related to equity in outcomes and address any learning gaps.

Facilities (space, equipment, instructional materials)

1030(a)(4) and 1030.60(a)(5): The institution shall have adequate and suitable space, equipment and instructional materials to support institutional programs.

The Chicago School currently owns and occupies 89,221 square feet of space at 325 N. Wells Street in downtown Chicago (the Chicago campus). To accommodate the Doctor of Osteopathic Medicine program within the proposed Illinois College of Osteopathic Medicine, The Chicago School is planning to build a new facility to accommodate the University's academic, administrative, and community space needs. Construction is expected to begin in January 2025 with a goal of obtaining a certificate of occupancy by December 2025. This expansion into osteopathic medicine represents The Chicago School's ongoing commitment to training and graduating a diverse workforce of expert practitioners to meet the healthcare needs of the most vulnerable communities. With the development of the proposed IllinoisCOM, The Chicago School aims to provide a sustainable channel of qualified physicians for communities in need, diversify future generations of healthcare providers, and equip future osteopathic physicians with the tools to identify, treat, and manage behavioral health conditions.

All facilities are in compliance with the Americans with Disabilities Act and all city and state regulations. Currently, The Chicago School is equipped with 19 classrooms, at an average size of 600 square feet, which include podiums with integrated control systems, computers, liquid-crystal display projectors, internet access, and a sound system along with headphone access for the hearing impaired. There are also two large rooms, at 1,350 square feet each, which are used for events and large assembly purposes.

In addition to housing programs currently offered on the Chicago campus, the planned facility is slated to receive supplementary technology resources, encompassing a spacious lecture and didactic learning area capable of accommodating up to 200 individuals, 20 smaller group learning rooms, an Osteopathic Manipulative Medicine (OMM) laboratory, a clinical skills and task training laboratory, standardized patient examination rooms, six simulation laboratories with corresponding control rooms, an immersive technology laboratory, prebriefing and debriefing rooms, and a dedicated research laboratory.

The University Library provides access to subscribed databases with access to eBooks, streaming videos, and academic journals in addition to professional librarian created content including research guides, tutorials, and webinars to support the needs of the academic community. The library currently has three professional librarians at the Chicago campus. Two additional medical librarians will be hired to support the needs of DO program students and faculty. In recent years, the library has strengthened its database portfolio in the broader health sciences to support the institutional mission of integrated physical and mental health to include resources such as the Medline Ultimate, CINAHL Ultimate, Acland's Video Atlas of Human Anatomy, Bates Visual Guide to Physical Examination, the Journal of the American Medical Association, and Visible Body. The library also has a robust interlibrary loan and document delivery service.

Faculty and Staff

1030.30(a)(5) and 1030.60(a)(6): The education, experience and other qualifications of directors, administrators, supervisors and instructors shall ensure that the students will receive education consistent with the objectives of the program.

The Chicago School will hire additional faculty to support the proposed Doctor of Osteopathic Medicine program. The University has identified institutional policies that ensure faculty and staff possess the training, credentials, and other related qualifications to provide program instruction and implementation. A formal faculty evaluation process and reward structure is in place.

Given its commitment to diversity, The Chicago School has organized a Diversity Action Board (DAB) of community members across academic colleges that work directly with University leaders to promote and advise on policies, procedures, communications, initiatives, and issues related to diversity across the institution and the community at large. The committee recently supported the development of The Chicago School's Inclusive Language Guide which provides support and guidance to the campus community to ensure conversations and messages across the University remain grounded in empowerment for all parties. This resource also includes education on respectful terminology and language to maximize inclusion for everyone at The Chicago School.

The Chicago School also provides support for the retention of faculty from underrepresented groups through the National Center for Teaching and Learning's faculty mentoring program. This program is designed to support junior faculty members in their professional development by pairing them with experienced faculty from other departments to provide guidance on instructional topics including pedagogical techniques, course design, assessment strategies, and navigating the promotion and tenure process. The primary focus of the mentoring program is to enhance teaching effectiveness.

The University has assembled the academic and administrative leadership needed to build the proposed DO program and accomplish the medical school's mission. The leadership team has proven experience in teaching, curriculum design, assessment and evaluation, scholarly activity, and academic leadership in medical education settings. The academic leadership team consists of the founding dean and chief academic officer, senior associate dean for pre-clinical affairs, senior associate dean for clinical affairs, associate dean of clinical simulation, associate dean of pre-clinical affairs, associate dean of clinical affairs, assistant dean of research, and assistant dean of graduate medical education and residency advising. Two medical librarians will be hired at the Chicago campus to support the needs of DO program students and faculty.

Fiscal/Personnel Resources

1030.30(a)(11): The institution should be financially stable and capable of assuring the revenues needed for meeting stated objectives and fulfilling commitments to students; and

1030.60(a)(8): Fiscal and personnel resources shall be sufficient to permit the institution to meet obligations to continuing programs while assuming additional resource responsibilities for the new certificate or degree program.

The proposed DO program will have a significant impact on the institution's overall finances due to the relative size of anticipated enrollments as well as the separate but complimentary nature of the program and the resultant need for investment in additional faculty, staff, library, facility, and equipment expenses. Approximately \$26 million of net expenses across Fiscal Year 2027 to 2029 will be funded by the University along with an operating surplus from ongoing programs which averaged approximately \$14 million per year over Fiscal Year 2020 to 2023. By Fiscal Year 2030, the proposed Doctor of Osteopathic Medicine program is projected to generate a net revenue of \$5 million and \$9 million in Fiscal Year 2031 which would represent an almost 65 percent increase to The Chicago School's overall net income (operating surplus).

Accreditation/Licensure

The proposed Doctor of Osteopathic Medicine program currently holds candidate status with the Commission on Osteopathic College Accreditation with the goal of obtaining pre-accreditation status by fall 2025. Graduates of the proposed program will be prepared to take the COMLEX-USA licensure examination sequence. The program's curriculum is aligned to the new Foundational Core Competencies for Undergraduate Medical Students. Additionally, the Core Entrustable Professional Activities for Entering Residency of the Association of American Medical Colleges (2014) were purposefully incorporated into clinical training rotations with competency examinations embedded in each rotation.

Program Information

1030.30(e): Publications and Information. Institutions shall be scrupulously ethical in all communication with the public and with prospective students. School publications, advertisements and statements shall be wholly accurate and in no way misleading; and

1030.60(a)(7): The information the institution provides for students and the public shall accurately describe the programs offered, program objectives, length of program, schedule of tuition, fees, and all other charges and expenses necessary for completion of the course of study, cancellation and refund policies, and such other material facts concerning the institution and the program or course of instruction as are likely to affect the decision of the student to enroll. This information, including any enrollment agreements or similar agreements, shall be available to prospective students prior to enrollment.

Detailed information about the proposed program including a description of the admission policies, institutional policies, tuition, fees, and curriculum will be published on the University's website.

Staff Conclusion

The staff concludes that The Chicago School and its proposed Doctor of Osteopathic Medicine meet the criteria in Sections 1030.30 and 1030.60 of the rules to implement The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010) and the relating Illinois Administrative Code (Title 23 Section 1030) pertaining to the assessment and licensure of a postsecondary institution.