

OMNEE

OMNEE Policy and Procedures

Osteopathic Medical Network of Excellence in Education Policy and Procedure Index

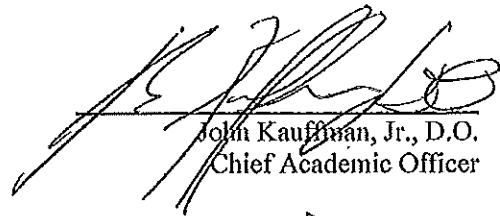
A=Administration
P=Affiliated Program
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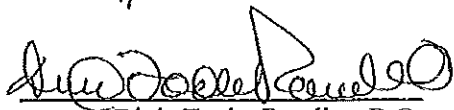
Osteopathic Medical Network of Excellence in Education

Policy Order No. A01

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Policy on OPTI Academic Officer

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1. PURPOSE

The OMNEE is committed to ensuring a quality educational program for its interns and residents. To ensure that quality, all educational programs will be under the direction and supervision of an osteopathic OPTI Academic Officer (OAO).

2. EDUCATION AND TRAINING

The OAO will have a D.O. degree earned from a Commission on Osteopathic College Accreditation (COCA) accredited college of osteopathic medicine (COM), and completed an American Osteopathic Association (AOA) approved postdoctoral training program and be AOA Board of Osteopathic Specialist (BOS) board certified.

2.1. Administrative Duties for Accreditation

The OMNEE Academic Officer, along with the designated representative from the OMNEE's affiliated and sponsored training programs, will sign all corrective action responses to deficiencies indicated by the AOA's Program and Training Review Committee (PRTC).

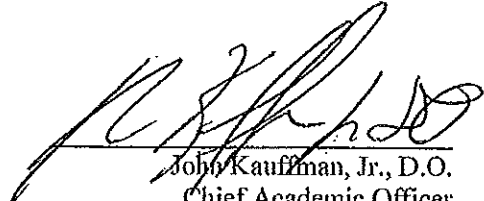
3. DURATION OF POLICY

The OPTI Academic Officer policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

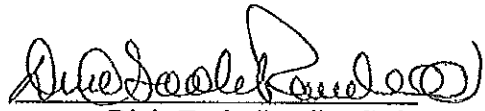
Osteopathic Medical Network of Excellence in Education

Policy Order No. A02

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Communication Policy

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1. PURPOSE

The Communication Policy details the processes by which the OMNEE ensures all committees communicate through the Administrative staff, the Osteopathic Graduate Education Committee, and then to the Board of Advisors.

2. OMNEE'S OSTEOPATHIC GRADUATE MEDICAL EDUCATION COMMITTEE

The Osteopathic Graduate Medical Education Committee (OGME) will receive and take appropriate action on reports/information it receives from its committees and educational programs:

- a. Curriculum Committee.

- b. Faculty Development Committee.
- c. Research Committee.
- d. Residency Review Committee.
- e. Intern and Resident Committee.
- f. Graduate Medical Education Committee monthly meeting minutes from OMNEE affiliated institutions.
- g. Other committees as appointed.

2.1. Educational Program Reporting

Each educational program will complete an internal review as required by the American Osteopathic Association's (AOA) *Basic Documents*. Results from these reviews will be forwarded to the OMNEE OGME Committee.

Each educational program will complete a quarterly evaluation on each intern and resident, which will be reviewed by the Program Director, DME and hospital GME committee. After this review, evaluations will be forwarded to the OMNEE OGME Committee.

2.2. Duty Hours Reporting

Each educational program will report their results of duty hour monitoring on at least a quarterly basis to the OGME Committee. Any duty hour concerns reported by an intern or resident should be addressed including the corrective action taken by the educational program.

2.3. Corrective Action Plans

In the event an educational program is required to submit a corrective action plan that resulted from an AOA program inspection, that plan must be submitted to the OMNEE OGME 60 days prior to its scheduled receipt to the appropriate AOA body for review and approval. After that review and approval, and at minimum, 30 days prior to the plan's scheduled receipt to the appropriate AOA body, the corrective action plan will be forwarded to the OMNEE's Academic Officer for his/her review and approval.

3. OMNEE ADMINISTRATIVE OFFICES

3.1. Substantive Change

Education programs will notify the OMNEE Administrative Office of:

- a. Any substantive change as detailed in the Substantive Change Policy # A04.
- b. Any administrative changes (DME, Program Director, Sponsorship or affiliation agreement).
- c. A program closure or reduction in positions that will impact trainees prior to program completion.
- d. A hospital or program closure or reduction in positions that would impact trainees prior to program completion.

The OMNEE will report all such changes to the AOA as required in the AOA *Basic Documents*.

3.2. Meeting Attendance

OMNEE Administrative Office staff will attend one Medical Education Committee meeting from each program on at least an annual basis.

3.3. *Corrective Action Plans*

The OGME will submit the approved educational program's corrective action plan at minimum, 30 days prior to its due date to the OMNEE Academic Officer for his/her review and approval. The Academic Officer will sign a letter attesting that the plan has been reviewed as required. That letter will accompany the corrective action plan which will be submitted to the appropriate AOA body.

4. OMNEE BOARD OF ADVISORS

The OMNEE Board of Advisors will receive reports and take appropriate action on information received from its subordinate committees:

- a. Executive Committee.
- b. Finance Committee.
- c. Other committees as appointed.

The Board of Advisors will receive reports and take appropriate action on reports/information it receives from the Administrative Office and the Osteopathic Graduate Medical Education Committee.

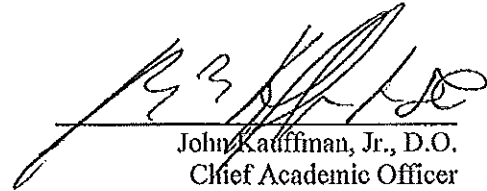
5. DURATION OF POLICY

The OMNEE Communication Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

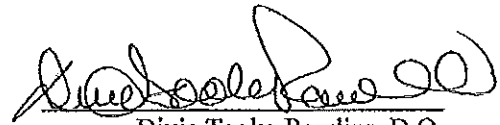
Osteopathic Medical Network of Excellence in Education

Policy Order No. A03

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Policy on Record Retention

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1. PURPOSE

The purpose of the Record Retention Policy is to ensure that all pertinent trainee records are maintained in a safe and permanent manner.

2. TRAINEE RECORDS—EDUCATIONAL PROGRAMS

In addition to following its own policies, OMNEE’s educational programs will keep all trainee records using a confidential, secure, and permanent records system. Trainee records must be kept indefinitely. Each educational program’s record retention process must include a separate electronic “back-up” of documents that utilizes an off-site location for storage for all its electronic records.

3. TRAINEE RECORDS—OMNEE

Any trainee record received by the OMNEE must be kept using a confidential, secure, and permanent records system. These files will be maintained indefinitely.

3.1. *OPTI Reports and other non-trainee material*

The OMNEE will keep all OPTI reports and other non-trainee material related to the American Osteopathic Association's OPTI accreditation for two accreditation cycles or for a total of ten years, which ever is greatest. At the end of this cycle, all records will be shredded and destroyed.

3.2. *Electronic Files*

All OMNEE electronic files will be saved to a VCOM server. As per VCOM policy, servers are backed-up every evening.

4. DURATION OF POLICY

The Record Retention Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

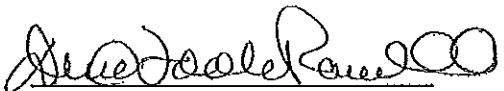
Osteopathic Medical Network of Excellence in Education

Policy Order No. A04

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Policy on Substantive Change

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1. PURPOSE

In order to comply with American Osteopathic Association’s (AOA) *The Basic Document for Postdoctoral Training Programs*, the OMNEE has developed a substantive change policy.

2. SUBSTANTIVE CHANGE

All substantive change requests will be submitted through the OMNEE to the AOA COPTI as required in the *Basic Document*. Substantive changes are:

- a. Changes in the established mission, objectives or location of the OMNEE;
- b. Changes in the legal status or form of control of the OMNEE, including the addition or loss of governing partners;
- c. Addition of instruction which represents a significant departure in terms of curriculum content, training program options, or methods of delivery of the curriculum and training; and

- d. Any increase in the number of training positions available within the OPTI as approved by the AOA.

3. PROGRAM CHANGES—SIGNATURES AND APPROVAL

All applications or correspondence related to affiliated and sponsoring institution program changes will be signed and approved by the OMNEE Academic Officer, the education program and affiliated or sponsoring institution as appropriate.

4. NOTIFICATION BY AFFILIATED SITES

Institutions that are affiliated with the OMNEE to provide intern and/or residency training programs will notify the OMNEE and the AOA's Division of Postdoctoral Training within 30 days of any change in the osteopathic OPTI Academic Officer.

4.1. Documentation Required

The affiliated institution will supply to the OMNEE and the AOA's Division of Postdoctoral Training a copy of the curriculum vitae of the newly installed osteopathic OPTI Academic Officer.

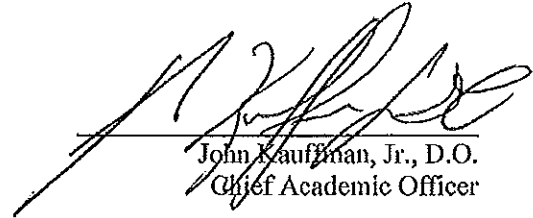
5. DURATION OF POLICY

The Substantive Change policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.


Osteopathic Medical Network of Excellence in Education

Policy Order No. A05

Effective Date: July 1, 2008



John Kaufman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Accreditation Compliance Policy

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1. PURPOSE

The OMNEE Accreditation Compliance Policy details the process by which the OMNEE will ensure its affiliated educational programs remain in continuous compliance with the American Osteopathic Association's (AOA) and specific Specialty Colleges' standards and policies and procedures.

2. EDUCATIONAL PROGRAM'S RESPONSIBILITY

Each educational program will, upon notification, inform the OMNEE of each of its AOA and specific Specialty College site inspections and will report to the OMNEE Osteopathic Graduate Medical Education Committee the results from those inspections immediately after receiving official correspondence from the AOA and/or Specialty College.

2.1. Corrective Action Plan

Each affiliated educational program is responsible for completing a corrective action plan if required after AOA program inspection. That plan must be submitted to the OMNEE OGME 60 days prior to its scheduled receipt to the appropriate AOA body for review and approval.

2.2. Annual Program Reports

Each affiliated educational program will complete an annual program report immediately after the end of the academic year. The Annual Report will be forwarded to the OMNEE staff 45 days prior the AOA's due date; typically November 1st.

Each program will utilize the forms required by the AOA for completion of their portion of the Annual Report.

2.3. AOA Electronic Data Updates

Each affiliated educational program must comply with all AOA requests for electronic data updates, including Trainee Information, Verification and Registration Audit (TIVRA) and Opportunities. Both TIVRA and Opportunities require each program to annually update their data in a format required by the AOA.

3. OMNEE RESPONSIBILITY

The OMNEE will assist each of its educational programs with the accreditation/approval processes of the AOA and specific Specialty College. OMNEE staff will provide assistance for the following accreditation activities:

- a. Internal Review;
- b. Corrective Action Plan;
- c. AOA Electronic Data Updates;
- d. Trainee and faculty evaluation processes; and
- e. Annual Program Reports;

OMNEE staff will also coordinate the "mock" site visit that will follow each educational program's mid-accreditation cycle internal review.

3.1. Corrective Action Plan

OMNEE staff will work with the affiliated education program in its preparation of a corrective action plan if needed after an AOA site visit. The OMNEE will submit the completed and approved corrective action plan to the appropriate AOA decision making body by its due date.

3.2. Annual Program Report

After the affiliated program member completes their portion of the Annual Report, the OMNEE staff will complete the compilation of the entire report and then forward the completed report to the OMNEE OGME Committee 30 days prior to the due date of November 1st. The OMNEE OGME will submit the complete report to the AOA by the November 1st due date.

3.3. AOA Electronic Data Updates

OMNEE staff will verify that each affiliated education program's has completed the annual data updates for AOA's TIVRA and Opportunities.

4. DURATION OF POLICY

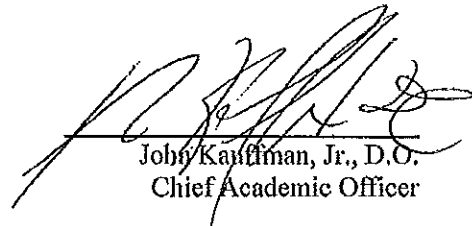
The OMNEE Accreditation Compliance Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

Osteopathic Medical Network of Excellence in Education

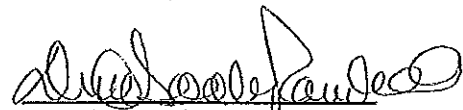
Policy Order No. P01

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Revised: December 2008



Johny Kaufman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Policy on Affiliation Agreement Requirements

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1. PURPOSE

The OMNEE is organized so that it contracts with educational partners for the purpose of postgraduate education. Affiliation agreements are those contracts that each party utilizes to specify roles and responsibilities of the affiliate. Affiliation agreements are legal documents.

2. AFFILIATION AGREEMENTS

All OMNEE educational partners will sign an affiliation agreement. These agreements will be reviewed annually and updated every five years or as necessary

2.1. Standard Compliance

The OMNEE and its affiliated and sponsoring partners/programs will comply with and observe the standards in the AOA's *Basic Document for Osteopathic Postdoctoral Training Programs*, as well as the policies and procedures stipulated in Part Two of the same document and the *Administrative Handbook for the Accreditation of Osteopathic Postdoctoral Training Institutions*.

2.2. *OPTI Member Compliance*

All OMNEE affiliation agreements will contain the following statements:

- OMNEE allows all member institutions the freedom to belong with other AOA-approved educational consortia, institutions or OPTIs.
- All member institutions will indicate that it recognizes and accepts specialty certification through the certifying boards of the American Osteopathic Association on an equal basis with those certifying boards recognized by the American Board of Medical Specialties (ABMS) for the purposes of obtaining hospital privileges.
- All member institutions will provide opportunities for student clerkship experience.

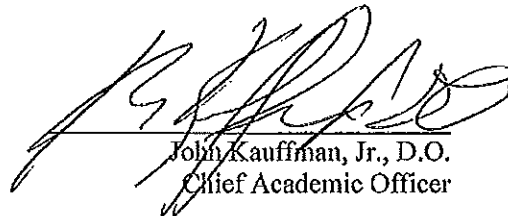
3. DURATION OF POLICY

The Affiliation Agreement Requirement policy and procedure is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

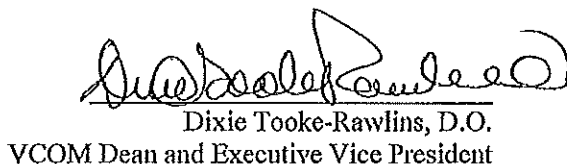
Osteopathic Medical Network of Excellence in Education

Policy Order No. P02

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Policy on Curriculum

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1. PURPOSE

The Curriculum Policy details the curriculum development, curriculum implementation, and review processes used within the OMNEE.

1.1. Curriculum Development

Except for dually accredited programs, all AOA approved affiliated and sponsored education programs will offer the same curriculum as developed by the OMNEE and approved by the Curriculum and OGME Committees. Curriculum is developed through the efforts of the OMNEE and its member organizations. Curriculum is based, in part, on the requirements from each specialty college and consists of the seven core competencies.

If the affiliated or sponsored education program is dually accredited with an ACGME program, the established curriculum will be reviewed by the OMNEE's OGME Committee to ensure it meets the OMNEE's curriculum policy requirements.

1.2. Osteopathic Philosophy Principles and Practices

All education programs must provide for the integration of OPP throughout the curriculum and in accordance with the basic standards requirements of each specialty college and the COPT/IEC.

1.3. Use of AOA Core Competencies

OMNEE education programs will utilize the American Osteopathic Association's Seven Core Competencies as outlined at: https://www.do-online.org/index.cfm?PageID=acc_postdocstds and as specified in the Basic Standards from each osteopathic specialty college. OMNEE education programs are encouraged to develop additional competencies as necessary.

2. TRAINING AT AFFILIATED SITES

OMNEE education programs are only offered at its affiliated sites and member sites. In those instances where an affiliated site does not offer a service, the intern or resident can obtain that training at another site providing that an affiliation agreement that addresses specialty college and COPT/IEC requirements for any educational experiences utilized routinely for all interns and residents in that program. This does not apply to elective rotations.

3. CURRICULUM REVIEW

Curriculum will be developed through the OMNEE's Curriculum Committee with final review and approval through the OGME Committee. After the curriculum development the curriculum will be reviewed on an annual basis at the Curriculum Review Summit, which will include representatives from each member institution, VCOM and the OMNEE.

Each month the residency program director will review the evaluations it receives from its trainees and attending physicians. Evaluations will be reviewed by the DME and presented quarterly to the respective institution's OGME Committee and then the OMNEE's OGME Committee.

The Intern and Resident and the Residency Review Committee can also submit curricular review items to the Curriculum Committee.

4. DURATION OF POLICY

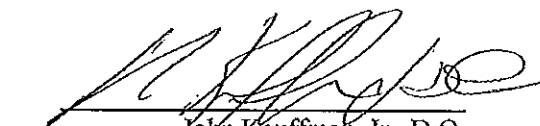
The OMNEE Curriculum Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

Osteopathic Medical Network of Excellence in Education

Policy Order No. P03

Effective Date: July 1, 2008

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John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Appointment and Reappointment Policy

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1. PURPOSE

The Appointment and Reappointment Policy details the requirements for each of the OMNEE's educational programs.

2. APPOINTMENT PROCESS

All physicians who will be serving as OMNEE faculty must have the appropriate appointment status from the educational program in which they work.

All faculty who serve as OMNEE faculty will be appointed through the College members' promotion and tenure committee.

3. REAPPOINTMENT PROCESS

Each OMNEE educational program must have a documented reappointment process that complies with the accreditation standards of the healthcare accreditor with which they have accreditation status.

3.1. Faculty Development

The reappointment process must include documentation that the physician has attended and/or completed two faculty development programs or modules per year. All new faculty, if they have not worked previously in an American Osteopathic Association approved residency program, must attend one program that includes the tenets, principles or practices of osteopathic medicine. All other faculty must attend one program that includes the tenets, principles or practices of osteopathic medicine every three years.

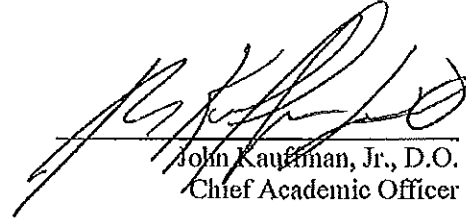
4. DURATION OF POLICY

The OMNEE Appointment and Reappointment Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.


Osteopathic Medical Network of Excellence in Education

Policy Order No. P04

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Internal Review Policy

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1. PURPOSE

The OMNEE Internal Review Policy details the process by which the OMNEE ensures all of its educational programs conduct an internal review at least mid-point in their accreditation cycle. The OMNEE, working with the affiliated institution's Medical Executive Committee, will provide assistance to each of its programs in conducting their annual review.

2. AFFILIATED INSTITUTION'S RESPONSIBILITY

As required by the American Osteopathic Association's (AOA) Council on Postdoctoral Education's (COPT) Internal Review of Residency Programs (July 2006), the affiliated institution's Medical Education Committee (MEC) is required to develop, implement and oversee the internal review process of each of its educational programs.

Each educational program will conduct an internal review of their program at the mid-point of their accreditation cycle.

Each educational program will submit a summary of the results and corrective actions, as applicable, to the OMNEE Osteopathic Graduate Education Committee 30 days prior to the date of the "mock" site inspection.

3. OMNEE'S RESPONSIBILITY

OMNEE will assist all its educational programs in their internal review process, specifically assistance with:

- a. Preparation of assessment documents;
- b. Data collection;
- c. Interviews;
- d. Preparation of the report; and
- e. Preparation of a corrective action plan, as necessary.

3.1. Mock Site Inspection

After the program conducts its internal review, the OMNEE will conduct a mock site inspection utilizing the specific Specialty College's Inspectors Workbook to assure program compliance with the American Osteopathic Association (AOA) *Basic Standards* and the specific Specialty College.

3.2. OMNEE Review

Each educational program will submit a summary of the results of their internal review to the OMNEE Osteopathic Graduate Education Committee for its review. This summary will also be accompanied by the results from the "mock" site inspection.

4. DURATION OF POLICY

The OMNEE Internal Review Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

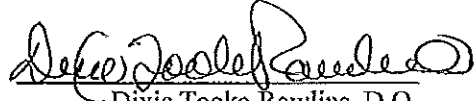
Osteopathic Medical Network of Excellence in Education

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Effective Date: July 1, 2008



John Kadffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Program Evaluation Review Policy

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1. PURPOSE

The OMNEE Program Evaluation Review Policy details the processes by which its trainees and program faculty conduct and review monthly and bi-annual evaluations.

2. AFFILIATED PROGRAM EVALUATIONS

Each affiliated program will have an evaluation process for the monthly evaluation of its trainees and their faculty. These evaluations will be performed through the program New Innovations, unless the affiliated hospital is utilizing an electronic evaluation process prior to signing an affiliation agreement with OMNEE.

2.1. Monthly Evaluations--Trainees

Each trainee will be required to complete a monthly evaluation of his/her faculty using New Innovations, or other approved electronic evaluation processes. These faculty evaluations will be reviewed yearly with the individual faculty by the Director of Medical Education (DME) for intern program and Program

Director for residents. These evaluations will be reviewed monthly by the DME and respective program director as well as quarterly with the trainee as part of the quarterly evaluation process.

2.2. Monthly Evaluations—Faculty

Each affiliated program will require their faculty to provide an informal evaluation of his/her trainee approximately two weeks into a rotation. At the end of the rotation, faculty will be required to complete an evaluation of his/her trainee(s) using New Innovations, or other approved electronic evaluation process. These evaluations will be reviewed by the DME (intern program) or the Program Director (residency program) every month and discussed with the individual trainee at the quarterly evaluations.

3. BI-ANNUAL EVALUATIONS--TRAINEES

Each affiliated program will require that a 360° evaluation will be conducted on each trainee on a bi-annual basis (December and May). The purpose of these evaluations is to ensure the trainee is an effective team member and one who works well with all hospital staff regardless of their position on the healthcare team. Trainees will be evaluated by hospital attending and other staff—nursing, laboratory, radiology, etc. to ensure that the trainee are thoroughly reviewed.

Once completed, these evaluations will be reviewed and discussed with the individual trainee and the program's DME (intern program) or the Program Director (residency program).

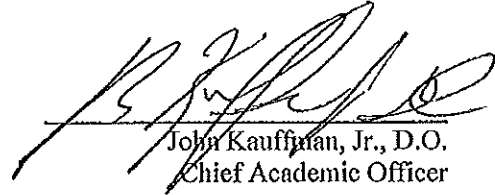
4. DURATION OF POLICY

The OMNEE Program Review Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

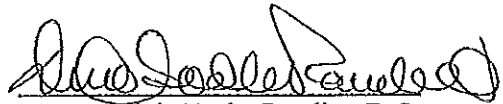
Osteopathic Medical Network of Excellence in Education

Policy Order No. T01

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Policy on Trainee Eligibility and Selection Process

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1. PURPOSE

The purpose of the Trainee Eligibility and Selection Process Policy is to establish guidelines by which the OMNEE's educational programs choose and select trainees for their programs.

2. TRAINEE ELIGIBILITY

Only graduates from the American Osteopathic Association's (AOA) Commission on Osteopathic College Accreditation (COCA) accredited college of osteopathic medicine (COM) are eligible for enrollment into OMNEE's educational programs.

3. TRAINEE SELECTION PROCESS

OMNEE's educational programs must have written policies and procedures that govern the recruitment, selection and appointment of its trainees. Those policies and procedures must include at least the following stipulations:

- a. OMNEE's educational programs must participate in the Electronic Residency Application Service (ERAS[®]) and the AOA Intern and Resident Matching Program (IRRP).
- b. AOA IRRP's policies and procedures must be followed when recruiting trainees. Local regulations and/or procedures do not supersede the IRRP; and
- c. Non-discrimination policies must be clearly stated.

4. PROMOTIONAL MATERIAL

All OMNEE educational programs must publish, either electronically or print, a catalog or other appropriate materials that include at least the following:

- a. Programs offered;
- b. Salary and benefit package information;
- c. Entrance requirements; and
- d. Other general policy information necessary for interns and residents to make informed decisions about their application.

This material must be kept updated at least every other year or as necessary.

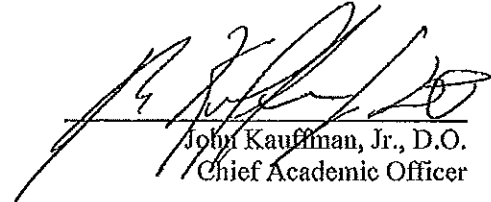
5. DURATION OF POLICY

The OMNEE's Trainee Eligibility and Selection Process Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

Osteopathic Medical Network of Excellence in Education

Policy Order No. T02

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Transfer Credit and Waiver Policy

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1. PURPOSE

The OMNEE Transfer Credit and Waiver Policy details the process by which the OMNEE's affiliated educational programs will accept, or not accept, trainees who request transfers and/or waivers for previous education.

2. PROGRAM TRANSFER CREDIT

OMNEE's affiliated educational programs will only accept transfer credit from trainees in good standing and from graduate medical training programs accredited by the American Osteopathic Association and approved by its specialty college committees or accredited by the Accreditation Council for Graduate Medical Education (ACGME).

2.1. Transfer Documentation

Trainees requesting a transfer to an OMNEE affiliated educational program must have the Program Director from his/her current training program submit a letter that contains information about: 1) Current academic standing of the trainee in his/her training program; 2) a list of all rotations taken and any credit

given for the rotations; and 3) any other pertinent information regarding the trainee's performance in the current training program.

3. PROGRAM WAIVERS

Trainees must formally request a waiver upon approval of their request for transfer. Waivers will only be granted based on the transfer letter from the Program Director (see Section 2.1 of this policy), and a review of the resident logs from his/her previous program by the Program Director from the OMNEE affiliated educational program.

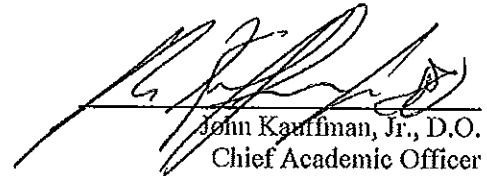
4. DURATION OF POLICY

The OMNEE Transfer Credit and Waiver Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.

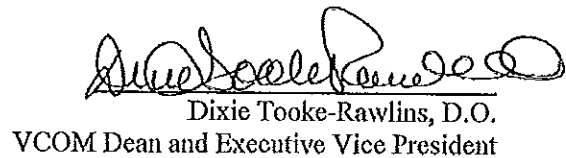
Osteopathic Medical Network of Excellence in Education

Policy Order No. T03

Effective Date: July 1, 2008



John Kauffman, Jr., D.O.
Chief Academic Officer



Dixie Tooke-Rawlins, D.O.
VCOM Dean and Executive Vice President

OMNEE Duty Hour Grievances Policy

1. PURPOSE1

2. DUTY HOUR POLICIES1

3. TRAINEE DUTY HOUR GRIEVANCES TO THE OMNEE1

4. DURATION OF POLICY2

1. PURPOSE

The OMNEE Duty Hour Grievances Policy provides a mechanism whereby interns or residents can report, without reprisal, any inconsistencies, violations, or disregard for the affiliated educational program's published Duty Hour Policies.

2. DUTY HOUR POLICIES

Each OMNEE affiliated educational program will publish duty hour expectations including how those duty hours are reported, monitored and reviewed. Included in those expectations, the policy must detail how the intern or resident reports any concerns regarding their duty hours.

3. TRAINEE DUTY HOUR GRIEVANCES TO THE OMNEE

In the event an intern or resident believes that the educational program has not addressed his/her duty hour concerns as required by that educational program's policies, the intern or resident may file a grievance through their OMNEE Osteopathic Graduate Medical Education Committee (OGME) representative. To file a grievance, the intern or resident must provide:

- a. Documentation about the actual duty hour concern;

- b. Documentation indicating the steps he/she took to address the duty hour grievance through their educational program's grievance process; and
- c. The final decision action/letter from the affiliated educational program.

This documentation must be submitted to intern's or resident's representative on the OMNEE OGME Committee. A decision letter will be forwarded to the intern or resident within ten business days after the OGME Committee reviews the duty hour grievance.

4. DURATION OF POLICY

The OMNEE Duty Hour Grievances Policy is effective as of the date above and shall remain effective until amended or terminated by the VCOM Dean and Executive Vice President and the OMNEE Academic Officer.