

DISCLOSURES AND COMPLIANCE

HEOA Disclosures and College Policies

In order to comply with the Higher Education Opportunity Act (HEOA) of 2008, Philadelphia College of Podiatric Medicine must meet certain disclosure and reporting requirements regarding the College's policies and procedures. That information can be found at <https://www.pcom.edu/disclosures/>

Additional information about these requirements may be found on the HEOA website (<https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/>).

Equal Opportunity and Non-Discrimination Statement

Philadelphia College of Podiatric Medicine (PCOM) seeks to foster an inclusive educational and work environment for all faculty, staff, applicants for employment, and students.

PCOM prohibits discrimination on the basis of age, race, sex, color, gender, gender identity and expression, national origin, ethnicity, ancestry, sexual orientation, religion, creed, disability, genetic information, marital status, pregnancy, military and military veteran status or any other legally protected class status in all its programs, activities, and employment practices.

PCOM subscribes to the principles and adheres to the requirements of state and federal law pertaining to civil rights and equal opportunity, in accordance with the requirements of Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973, as amended; the Age Discrimination Act of 1975, as amended, and the Americans with Disabilities Act of 1990, as amended and complies with all applicable federal conscience protections.

Questions regarding this policy should be directed to the Equity and Title IX Manager (<https://www.pcom.edu/title-ix/>) (Rowland Hall Suite 532, Philadelphia, PA 19131, 215-871-6528), who is the designated coordinator of PCOM's non-discrimination program. Inquiries may be directed to: Assistant Secretary for Civil Rights, U.S. Department of Education, Washington, D.C. 20202. For more information, please visit the Office of Civil Rights (<https://www2.ed.gov/about/offices/list/ocr/aboutocr.html>).

Complaints Regarding Non-Compliance with Accreditation Standards

PCOM is committed to meeting and exceeding the standards for accreditation for the College and all degree programs, including the standards for colleges of podiatric medicine as described by the American Osteopathic Association Commission on Podiatric College Accreditation, the standards for schools of pharmacy as described by the Accreditation Council for Pharmacy Education, the standards of the American Psychological Association and the National Association of School Psychologists for psychology programs and the accreditation standards of the Accreditation Review Commission for Education for the Physician Assistant. Copies of the respective standards are available upon request from the Office of the Provost. The Academic Program Handbook of each program contains contact information and/or the procedure of each accrediting body for filing of complaints regarding compliance with accreditation standards, where applicable.

Contact information for the Middle States Commission on Higher Education may be found under Accreditation in this catalog.

Georgia: Complaints Against Institutions

The Commission requires that students utilize and complete their institution's grievance procedure in an attempt to resolve any complaint or concern before submitting a complaint to the Commission. If the institution's resolution is not satisfactory, a student may then appeal to the Commission, but it will not investigate a complaint unless the student has exhausted all available grievance procedures outlined by the institution.

Non-student complaints must comply with the general complaint rules; complainants should review all information prior to submission.

See our GNPEC complaint rules and SARA complaint rules for full information.

<https://gnpec.georgia.gov/student-resources/complaints-against-institution> (<https://gnpec.georgia.gov/student-resources/complaints-against-institution/>)

Family Educational Rights and Privacy Act (FERPA)

- The Family Educational Rights and Privacy Act of 1974 (FERPA) places certain limitations on the disclosure of personally identifiable student information maintained by PCOM with respect to students; limits access to academic records; and gives students certain rights with respect to educational records, including the right to access, the right to obtain copies, the right to seek correction of such records through informal and formal internal procedures, and the right to place a statement in such educational records explaining any information that they believe to be inaccurate or misleading.
- PCOM considers certain information to be "directory information" under the Family Educational Rights and Privacy Act and, therefore, subject to disclosure without prior consent of the student. Unless written objection is received by the Registrar, the College will treat the following as directory information to be released at the discretion of the Registrar's Office: student name, address, telephone number, e-mail address, date and place of birth, enrollment status dates of attendance, major field of study, Dean's list, degrees and awards received and names of undergraduate and/or graduate schools attended, internships and residencies.
- **Right to Withhold Disclosure**
- Under the provisions of the Family Educational Rights and Privacy Act, currently enrolled students may withhold disclosure of directory information. The Registrar's Office must receive written notification from a student indicating the information to be withheld. Should a student decide to inform the institution not to release certain information, any future requests for such information from non-institutional persons or organizations will be refused. Decisions about withholding any information should be made very carefully.
- PCOM will honor each request to withhold any of the categories of information indicated by a student. However, the College cannot assume responsibility to contact a student for subsequent permission to release them should requests be received.
- PCOM assumes that failure to request the withholding of directory information indicates approval for disclosure.
- **Right to Consent to the Disclosure of Personally Identifiable Information**

- All personally identifiable information related to a particular student other than directory information is considered
- Confidential information and may not be released without the written consent of the student. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions:
 - Other schools to which a student is transferring
 - Specified officials for audit or evaluation purposes
 - Appropriate parties in connection with financial aid to a student
 - Organizations conducting certain studies for or on behalf of the school Accrediting organizations
 - To comply with a judicial order or lawfully issued subpoena PCOM's Registrar will make reasonable attempt to notify the student
 - Appropriate officials in cases of health and safety emergencies
 - State and local authorities, within a juvenile justice system, pursuant to specific state law
 - School officials with legitimate educational interest (including but not limited to administrative, supervisory, academic, research or support staff)
 - National Board of Medical Examiners (NBOME) – a school official is determined to have a legitimate educational interest if the information requested is required for that official to:
 - Perform appropriate tasks that are specified in his/her position/ description or contract/agreement Perform a task related to the student's education
 - Perform a task related to the discipline of a student Provide a service or benefit relating to the student or student's family such as health care, counseling, job placement or financial aid
 - The school official is not authorized to share this information with a third party without the student's written permission. Such information, when it has fulfilled its original purpose, should be returned to the originating office. All other access to a student's record is granted in accordance with the Family Educational Rights and Privacy Act.
- **Right to Inspection and Review of Records**
 - When the student matriculates, the Office of Admissions will forward the following materials to the Registrar's Office. Information retained in the file is as follows:
 - Current application AACOMAS profile (DO students)
 - CASPA profile (PA students)
 - PharmCAS profile
 - (PharmD students) Transcripts
 - Standardized test scores (e.g., MCAT, GRE, MAT)
 - Letters of acceptance and prepayment Completed Technical Standards form
 - Previous applications and decision-related correspondence
 - All other materials in the applicant file are purged in accordance with the Family Educational Rights and Privacy Act of 1974, as amended.
 - A current or previously enrolled student has the right to inspect and review his or her education records maintained by the school. This right does not extend to applicants, those denied admission, or those admitted who do not enroll. A ten day written notice must be submitted to the Registrar's Office. The Registrar's Office will make arrangements for access and notify the student of the time and place where the records may be inspected.
 - Other data accrued during the student's tenure at the College including, but not limited to, transcripts, NBOME Board scores, academic status letters (e.g., probation, warning, dismissal), course related forms (e.g., withdrawal), name change, and change of status documentation will be placed in the student's file.
- Transcripts or grade reports from other institutions, copies of scores from national tests (MCAT, NBOME Board scores, Praxis, etc.) and/or any other third party material will not be released by PCOM. Students must contact the institution that issued these documents to obtain copies.
- **Right to Amendment of the Educational Record**
 - Under FERPA, an eligible student has the right to request that inaccurate or misleading information in their education records be amended. While a school is not required to amend education records in accordance with an eligible student's request, the school is required to consider the request. If the school decides not to amend a record in accordance with an eligible student's request, the school must inform the student of their right to a hearing on the matter. If, as a result of the hearing, the school still decides not to amend the record, the eligible student has the right to insert a statement in the record setting forth their views. That statement must remain with the contested part of the eligible student's record for as long as the record is maintained. However, while the FERPA amendment procedure may be used to challenge facts that are inaccurately recorded, it may not be used to challenge a grade, an opinion, or a substantive decision made by a school about an eligible student. FERPA was intended to require only that schools conform to fair recordkeeping practices and not to override the accepted standards and procedures for making academic assessments, disciplinary rulings, or placement determinations. Thus, while FERPA affords eligible students the right to seek to amend education records which contain inaccurate information, this right cannot be used to challenge a grade or an individual's opinion, or a substantive decision made by a school about a student. Additionally, if FERPA's amendment procedures are not applicable to an eligible student's request for amendment of education records, the school is not required under FERPA to hold a hearing on the matter.
 - Complaints regarding alleged violations of rights accorded students by the Family Educational Rights and Privacy Act or the regulations promulgated thereunder may be directed in writing to:
 - Family Educational Rights and Privacy Act Office
 - Department of Education
 - Room 4511, Switzer Building
 - 400 Maryland Avenue, SW
 - Washington, D.C. 20202
 - For more information, visit: <https://studentprivacy.ed.gov/ferpa> (<https://studentprivacy.ed.gov/ferpa/>)

Statement on Student Academic Freedom

Academic freedom is essential to the integrity of intellectual inquiry and scholarly criticism, to the dissemination of knowledge and to the search for truth and wisdom.

PCOM affirms the vital role of diverse perspectives in helping students to develop their own knowledge and their ability to evaluate knowledge claims critically. The administration, faculty, staff and students share responsibility for fostering a climate that is favorable to the free exchange of ideas and the examination of conflicting ideas and interpretations when expressed professionally. Students have the right to a safe classroom environment in which they can explore controversial

ideas in an atmosphere characterized by openness, tolerance and civility, and where they will be graded only on the intellectual merits of their work.

Statement on Substance Abuse

The College recognizes the importance of assisting students in their development of a lifestyle free from the use of illegal substances and the abuse of alcohol. When a student is suspected of being under the influence of alcohol or drugs, that student will be reported to the Student Affairs Director on their respective campus. Appropriate actions will be taken. This may include referral to counseling support programs, suspension, or termination of enrollment. Details of the legal sanctions under applicable federal, state and local alcohol and drug laws, and the Pennsylvania and Georgia vehicle codes and Pharmacy Acts are provided in the PCOM General Student Handbook.

Placement Statistics

Statistics on placement for Doctor of Osteopathic Medicine graduates in Graduate Medical Education and COMLEX-USA Level 3 Graduate residency/internship match rates and COMLEX-USA Level 3 performance statistics for PCOM students are reported on the pcom.edu website under "program statistics" at: http://www.pcom.edu/prog_stats/prograstats.html

Statistics on placement and licensure rates for Doctor of Clinical Psychology and Doctor of Pharmacy graduates are reported on the pcom.edu website under "program statistics" at <https://www.pcom.edu/academics/programs-and-degrees/clinical-psychology/admissions-outcomes-other-data.html> and <https://www.pcom.edu/academics/programs-and-degrees/doctor-of-pharmacy/program-data.html>. Other programs also provide statistics about students and graduates.