



TOURO
UNIVERSITY
CALIFORNIA

College of
Osteopathic Medicine

Strategic Plan

2023 - 2028

Effective as of July 1, 2023

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Introduction to the Strategic Plan

Every strategic plan is a “living document” which must be periodically renewed and amended to meet new challenges and opportunities encountered by a changing environment and maturation of an institution. The prior Touro University California College of Osteopathic Medicine (TUCOM) Strategic Plan (2017–2022) generated a five– year framework to guide decisions about the college’s future directions and to inform resource and energy allocation. Since that time, the institution has grown and changed.

With new leadership, faculty, and staff, along with the dedication and expertise of our seasoned leaders, faculty, and staff, the COM has been infused with innovative ideas and vigor. This next Strategic Plan will both enhance and expand upon prior goals and also introduce new goals that strengthen the college and our collective mission.

Furthermore, this plan was created with consideration of a planned class size increase, approved in December 2022, to start in August 2024. All initiatives are designed to support additional TUCOM faculty, staff, and students within the scope of future growth.

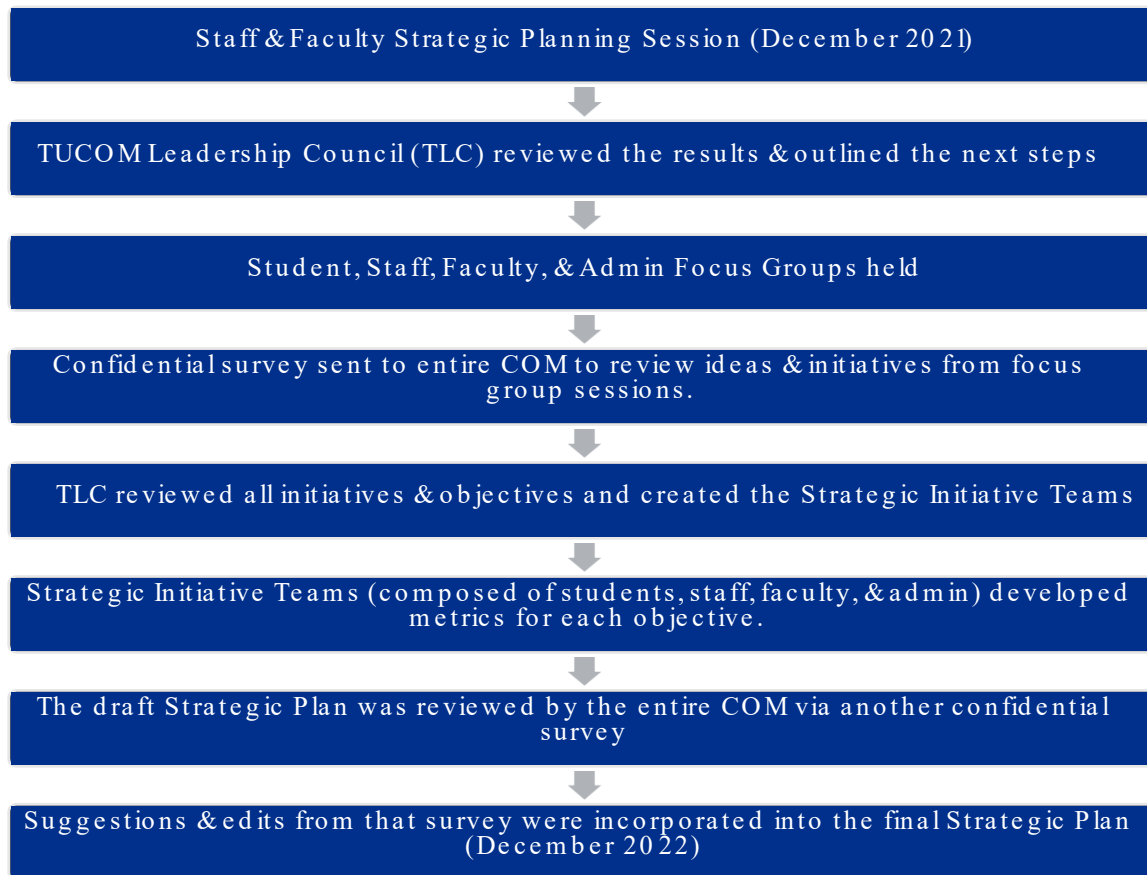
The Strategic Planning Process

TUCOM underwent a year-long strategic planning process that began on December 10, 2021, when TUCOM faculty and staff came together for a 2023–2028 Strategic Planning Session. After reviewing and reaffirming TUCOM’s Vision and Mission, the group initiated a SWOT Analysis, highlighting the current strengths, weaknesses, opportunities, and threats of the institution. Next, the TUCOM Leadership Council (TLC), which comprises representatives of all TUCOM departments as well as TUCOM staff, faculty, and administration, met to discuss and review the next steps of the Strategic Planning process. Focus Groups of students, faculty, staff, and members of administration were then held in 2022 to further delineate TUCOM’s current strengths, weaknesses, opportunities, threats, and needs. Initial ideas gathered in these focus groups were reviewed with the entire COM student body, faculty, and staff via a confidential survey tool.

As the ideas were turned into strategic initiatives, the TLC reviewed all initiatives and objectives and created Strategic Initiative Teams for each identified initiative. Each Strategic Initiative Team is composed of TUCOM students, staff, faculty, and administration. Metrics were developed for each objective by the selected Strategic Initiative Team. Finally, a draft Strategic Plan document was developed and reviewed by the entire COM. A survey of all COM constituents was conducted to assess commitment to the objectives and achievability of the metrics. Respondents were invited to edit and comment on the Strategic Initiatives. The

comments were collected, collated, and utilized to form this final document. This Strategic Planning Process is outlined in the chart below.

TUCOM's Strategic Planning Process for the 2023-2028 Strategic Plan:



Incorporation of COCA Accreditation Requirements

This Strategic Plan complies with the Commission on Osteopathic College Accreditation (COCA): [COM Continuing Accreditation Standards \(COM-CAS\)](#) which were effective as of July 1, 2019. There are twelve accreditation standards, each with an accompanying set of elements. Relevant sections of the COCA Standards and Elements are referenced when either directly or peripherally related to a strategic initiative and objective. This Strategic Plan also takes into account the updated [COCA 2023 COM Continuing Accreditation Standards](#) which will be effective as of August 1, 2023.

University and Institutional Considerations

As part of a larger institution, the TUCOM Strategic Plan incorporates the mission, vision, and strategic goals of the Touro University System.

Touro University System Mission Statement

Touro University is an independent institution of higher education under Jewish auspices, established to transmit and perpetuate the Jewish heritage, as well as to serve the general community in keeping with the historic Jewish commitment to intellectual inquiry, the transmission of knowledge, social justice, and service to society.

Upon embarking on this Strategic Plan, **Crossroads to Opportunities: Strategic Action Plan for the Touro University California** (TUC) campus was reviewed to ensure alignment and consistency between the TUCOM and TUC plans. All seven strategic goals of the TUC plan were considered.

Touro University California Strategic Goals

1. Invest to further improve and develop the TUC physical campus.
2. Be an exemplary learning campus and model employer by promoting student and employee achievement and excellence.
3. Adopt academic programs by enhancing and expanding current programs and selectively adding new disciplines.
4. Advanced learning via innovative teaching and investment and accompanying instructional technology.
5. Integrate Interprofessional Education (IPE) in the TUC curriculum utilizing community and global partnerships.
6. Expand scholarship and focused research on campus and through key partnerships.
7. Foster a welcoming university culture that promotes health and wellness.

The TUCOM Mission Statement

COCA Standard 1, Element 1.2 requires each College of Osteopathic Medicine (COM) to produce and publish a strategic plan addressing all core aspects of the COM mission.

The strategic plan review must include faculty and students at a minimum. COCA also requires (COCA Standard 1, Element 1.1 – Program Mission) the mission statement for the program to explain the overall purpose of the program and to serve as a guide for program planning and assessment.

Touro University California College of Osteopathic Medicine (TUCOM) Mission Statement

The Mission of Touro University Osteopathic Medicine Program is to prepare students to become outstanding osteopathic physicians who uphold the values, philosophy and practice of osteopathic medicine and who are committed to primary care and the holistic approach to the patient. The program advances the profession and serves its students and society through innovative pre-doctoral and post-doctoral education, research, community service, and multidisciplinary and osteopathic clinical services.

Since TUCOM is part of a larger educational institution, the Touro University System (Touro), TUCOM's mission is consistent with the institution's mission. COCA requires that each COM review their program mission periodically and revise it as appropriate, by including faculty and students, at a minimum, in the process.

As part of this Strategic Plan development, the Mission Statement was reviewed in Summer 2022. The process included focus group meetings and a survey of the entire TUCOM student, faculty, and staff community. Those surveyed identified "preparing students to become outstanding osteopathic physicians" as the highest priority area of the mission, whereas a "commitment to primary care" and "multidisciplinary and osteopathic clinical services" scored lower priority areas. Ultimately the recommendation was not to change the mission at this time. The TUCOM Mission Statement was again reviewed and accepted by the COM faculty & staff on December 8, 2022.

TUCOM's Core Values

TUCOM has identified core values as represented in the acronym WE SCORE. These values reflect TUCOM's culture and help to guide decision-making and interactions. The focus groups & campus-wide surveys completed through this Strategic Planning process reaffirmed TUCOM's commitment to these values and beliefs:

W: Wellness
E: Equity (Diversity, Equity, & Inclusion)
S: Social Justice
C: Community Health
O: Osteopathic Distinction
R: Research
E: Education

The training, curriculum, and culture reflected by these values serve as a means to distinguish TUCOM graduates, and to measure how our graduates distinguish themselves as healthcare providers.

TUCOM's set of core values, "WE SCORE", informs and enlightens this Strategic Plan and reflects TUCOM's commitment to decision-making, interactions, and outcomes that define the "osteopathic difference."

SWOT Analysis

The initial Strategic Planning Session, held on December 10, 2021, with all TUCOM faculty & staff, involved a SWOT Analysis which analyzed TUCOM's strengths and weaknesses and the opportunities and threats that it faces into the future. The confidential survey of all TUCOM stakeholders (including students, staff, faculty, and administration) further delineated the SWOT Analysis to focus on the details below:

<p>Strengths:</p> <ol style="list-style-type: none"> 1. Faculty 2. Family/community atmosphere 3. Student advocacy 4. Diversity of faculty, staff, and students 5. Osteopathic foundation 6. Community service 7. Caring culture 	<p>Opportunities:</p> <ol style="list-style-type: none"> 1. TUS Collaboration 2. Community as supporters and as patients 3. Alumni 4. Community Service opportunities 5. External collaborations & partnerships (other schools/healthcare systems)
<p>Weaknesses:</p> <ol style="list-style-type: none"> 1. Facilities & Infrastructure 2. Lack of stable rotation sites 3. Communication with students 4. Academic scheduling 5. Lectures 6. Limited simulation 7. Limited research 8. Faculty and Staff turnover 	<p>Threats:</p> <ol style="list-style-type: none"> 1. Growth of other DO schools, including regionally 2. Safety issues in the local community 3. Housing 4. Budget constraints 5. Bias against/reputation of osteopathic medicine

Implementation Process

The generation of specific short-term targets for each opportunity for improvement, innovation, and action is the responsibility of six Strategic Initiative Subcommittees. Each subcommittee consists of co-managers, who are typically members of the TUCOM Leadership Council (TLC). Additionally, subcommittee members include faculty, administrative staff, and students. The subcommittee determines the specific actions that must be completed in order to reach their targets. The creation of short-term milestones, quantified according to reasonable time estimates for completion, embedded in a dashboard, will establish a blueprint for completion and permit for real-time monitoring and adjustments. Each subcommittee will provide updates to the TLC once to twice a year, highlighting progress, obstacles, challenges, adjustments, and a review of dashboard metrics. Cost-assessment, resource allocation, and determination of internal and external funding sources necessary to implement the strategic goals will be estimated by each subcommittee. This will encourage integration and linkage of the Strategic Plan to the University budgeting process.

Summary of the Strategic Initiatives

The strategic planning process generated six Strategic Initiatives over the next five years:

1. Educational Excellence
2. Student Experience
3. University, COM, and Campus Infrastructure
4. Faculty and Staff Experience
5. Research, Scholarly Activity, and Community Health
6. Diversity, Equity, and Inclusion

Opportunities for improvement, innovation, and action are identified for each Strategic Initiative. The objectives are prioritized as highest priority, middle, and lower priority, based upon the results of the campus-wide survey with agreement that all objectives are important and should be addressed throughout this next 5-year term.

Oversight and Participation

The 2023–2028 TUCOM Strategic Plan was created under the leadership of the TUCOM Dean, Dr. Tami Hendriksz. The process was executed with assistance from Dr. Alissa Craft, an external expert consultant, and oversight by the Dean’s Office administrators, Ms. Sarah Passage and Ms. Susan Harrington.

A list of individuals who participated in the creation of this plan is provided below. TUCOM Faculty, Students, and Staff also participated in the creation of this plan via anonymous surveys. On average, the collected data included feedback from more than 60% of faculty, 15% of students, and 55% of staff.

TUCOM Participants in the Creation of the 2023-2028 Strategic Plan

Georgia Allen, DO, *Faculty Senate Representative*
Nathalie Bergeron, PhD, *Associate Dean for Research*
Samaneh Bolourchi, OMS IV, *COMSEC past President*
David Coffman, DO, *Interim Associate Dean, Clinical Education*
Nicolas Crouch, OMS IV, *2023 Class President*
Glenn Davis, MS, *Assistant Dean of Academic Affairs*
Mallory Davis, *Staff Council Representative*
Gail Feinberg, DO, *Chair, Primary Care, Faculty Senate Representative*
Zev Felix, OMS II, *COMSEC VP of Communications*
Donna Fyfe, *Staff Council Representative*
Nathalie Garcia-Russell, PhD, *Assistant Dean, Clinical Education*
Greg Gayer, PhD, *Chair, Basic Science*
Susan Harrington, *Assistant Director of CME and COM Accreditation*
Walter Hartwig, PhD, *Director of Enrollment Management and Student Success*
Tami Hendriksz, DO, *Dean*
Chrissa Karagiannis, OMS V, *OMM Fellow*
May Lin, DO, *Assistant Dean for Graduate Medical Education and Program Development*
Rushali Manhas, OMS II, *COMSEC VP of Academic Affairs*
Rishikesh Menon, OMS II, *COMSEC President*
Alan Miller, PhD, *Program Director, Master of Science in Medical Health Science*
Heidi Molga, OMS V, *OMM Fellow*
Shona Mookerjee, PhD, *Associate Professor*
Natalie Nevins, DO, *Associate Dean for Graduate Medical Education and Program Development*
Maria Nguyen, OMS II, *COMSEC VP of Student Health and Wellness*
Sarah Passage, *Senior Director of CME and COM Accreditation*
Nicole Peña, DO, *Chair, OMM*
Jean-Marc Schwarz, PhD, *Interim Associate Dean for Research*
Jay Shubrook, DO, *Interim Chair, Primary Care*
Theo Smith, PhD, *Assistant Professor, Faculty Senate Representative*
Arielle Vale, *Executive Assistant to the Dean*
Jennifer Weiss, DO, *Assistant Dean, Faculty Development*
K. Scott Whitlow, DO, *Senior Associate Dean*
Alesia Wagner, DO, *Associate Dean of Academic Affairs*

In addition, this process included anonymous participation via surveys from more than 60% of faculty, 15% of students, and 55% of staff.

STRATEGIC INITIATIVE 1: EDUCATIONAL EXCELLENCE

PRIORITY LEVEL	OBJECTIVE	COCA ELEMENT(S) ADDRESSED	METRIC OF IMPROVEMENT
HIGHEST	Increase Clinical Rotation Capacity	6.9 6.10	<ul style="list-style-type: none"> Have a minimum of 110% of needed core clinical rotation capacity. Ensure that all students can complete all 3rd year core rotations within 50 miles of the assigned core region.
	Redevelop and Refine Early Clinical Experiences for Year 1 and 2 Students	6.1	<ul style="list-style-type: none"> Demonstrate an increase in ECE availability for OMS 1 and 2 students. Develop specific objectives for each semester of ECE.
MIDDLE	Expand the Core Clinical "Didactic" Education Program	6.9 6.11 6.12	<ul style="list-style-type: none"> Ensure that all core clinical rotations have a syllabus that incorporates active learning activities in addition to clinical experiences. Maintain a 95% or above pass rate on COMLEX Level 2. Maintain a 100% pass rate on COMAT exams, (score of 90 or above).
	Increase Active Learning Modalities Throughout the Preclinical Curriculum	6.7 7.6	<ul style="list-style-type: none"> Offer at least 1 – 2 faculty trainings in active learning modalities each year. Demonstrate an increase in the active learning modalities in the preclinical curriculum.
	Enhance Educational Experiences through Technology and Simulation	4.4 7.6	<ul style="list-style-type: none"> Define and demonstrate an increase in educational experiences through technology and simulation within all four years of the curriculum. Offer at least 1 – 2 faculty trainings involving educational technology learning modalities each year.

LOWER

Create or
Expand IPE
Experiences in
all Four Years of
the Curriculum

6.
8

- Expand IPE opportunities to include all colleges and coordinate IPE learning events to the competencies.
- Demonstrate an increase in IPE activities in each year of the curriculum.

STRATEGIC INITIATIVE 2: STUDENT EXPERIENCE

PRIORITY LEVEL	OBJECTIVE	COCA ELEMENT(S) ADDRESSED	METRIC OF IMPROVEMENT
HIGHEST	Improve Communication Between the University, COM, and Students	4.3	<ul style="list-style-type: none"> • Maintain regular town halls between the Dean and students. • Develop and maintain the COM section of the TUC Faculty/Staff Intranet as a key resource for faculty and staff seeking information about TUC and TUCOM services and operations. • Maintain regular New Horizons Committee meetings with summary results distributed by the COM Dean’s office to the students, faculty, and staff. • Increase accessibility and utilization of the TUC hosted Student Intranet as a key resource for students seeking information about COM student services and curriculum. • Ensure a space in each town hall and each Dean’s Office general communication for University messaging and contributions as needed.

MIDDLE	Increase Student Body Diversity	5.2 5.5	<ul style="list-style-type: none"> • Define diversity as it applies to the student body. • Create pipeline/pathway programs with a focus on an increase in applications from the defined diverse population. • Perform a review of those pipeline/pathway programs on an annual basis to assess effectiveness and update/modify the programs as necessary. • Demonstrate an increase in offers of acceptance to the defined diverse population. • Demonstrate an increase in enrollment from the defined diverse population.
			<ul style="list-style-type: none"> • Ensure graduation rate of the defined diverse population mirrors the overall student population by dedicating the necessary resources.
	Increase Student Wellness	5.3 6.7 9.8 9.9	<ul style="list-style-type: none"> • Implement a student wellness program incorporating mental health, physical health, and nutrition with a dedicated budget and dedicated weekly time, with a minimum of 24 time periods per semester. • Reduce classroom seat time, a major source of student stress, by 20%.
LOWER	Enhance Student Safety and Comfort	4.2 5.3	<ul style="list-style-type: none"> • Complete and review an annual survey/assessment of factors that would increase student safety and comfort.

STRATEGIC INITIATIVE 3: UNIVERSITY, COM, AND CAMPUS INFRASTRUCTURE

PRIORITY LEVEL	OBJECTIVE	COCA ELEMENT(S) ADDRESSED	METRIC OF IMPROVEMENT
HIGHEST	Modernize COM Educational Facilities for Experiential and Technology Based Learning	4.1 4.3 7.8 10.1	<ul style="list-style-type: none"> • Increase availability of high-fidelity simulation by 15% including increasing space by 30% for increased usage of simulation technologies. • Establish a plan for funding and construction of at least one improved experiential learning area/s (either OMM, clinical skills/doctoring, Standardized Patient/OSCE, simulation, or telemedicine lab). • Improve technological learning capabilities in classrooms and labs. • Create additional clinical opportunities for faculty and revenue for COM including a COM run private practice with a practice space. • Start an OMM Hospital Service to enable additional clinical teaching for COM students and build the infrastructure for a future ONMM residency program.
MIDDLE	Develop a Capital Fund/Permanent Endowment for Infrastructure Enhancements	3.1	<ul style="list-style-type: none"> • Identify 3 potential sources of increased COM revenue (for example more extramural grants, more fundraising) – hire grant writer to raise extramural funds for the above. • Work with Alumni Affairs and Outreach team members to establish a fundraising campaign to fund a minimum of one concept in this strategic plan. • Identify opportunities for issuing bond initiatives to raise

			funds.
	Improve Campus Security/Safety	4.1 4.2	<ul style="list-style-type: none"> Participate in university strategic planning and advocate for
			<p>institutional improvements in the following areas:</p> <ul style="list-style-type: none"> Campus and building access points and related safety considerations. Partnerships with local emergency response agencies and development of emergency preparedness plans. Improvement and restoration of historical campus buildings and landscaping/campus beautification.
LOWER	Develop or Enhance Student, Faculty, and Staff Wellness Spaces	4.1	<ul style="list-style-type: none"> Create separate space (for faculty/staff and students) in each main building for both mindfulness/quiet and interaction. Develop plans for additional indoor /outdoor spaces on campus for Zen Garden/study space/etc. Develop plans for one additional recreational area for outdoor exercise.

STRATEGIC INITIATIVE 4: FACULTY AND STAFF EXPERIENCE

PRIORITY LEVEL	OBJECTIVE	COCA ELEMENT(S) ADDRESSED	METRIC OF IMPROVEMENT
HIGHEST	Reduce Employee Turnover	7.1 7.6 7.8	<ul style="list-style-type: none"> Establish faculty and staff adequacy models that align with work performed. Develop strategies to address systemic barriers to advancement for faculty and staff. Reduce employee out of pocket contribution for benefits while maintaining quality market competitive standards (Ayon, Mercer, MGMA, Economic Research Institute). Develop and review an annual faculty and staff satisfaction and needs assessment survey. Increase opportunities for career and professional growth, including pathways for staff growth and promotion with adequate budget and funds to incentivize retention. Increase staff support and salaries commensurate with professional expectations. Track retention and attrition, compare the associated costs, and assess progress annually.

MIDDLE	Increase Funding for Faculty and Staff Professional Development	5.2 7.6 7.8 7.9	<ul style="list-style-type: none"> • Increase allocation of department resources for professional development and education including Conferences, CME, Registration/Membership Fees/Courses/Training. • Provide opportunities for advancement through professional development and structured pathways for promotion. • Allocate time and resources to develop a culture of success in learning new processes and programs. • Increase specific faculty development training in DEI and structural competency.
	Increase Faculty and Staff Wellness	5.3 9. 8 9. 9	<ul style="list-style-type: none"> • Promote a culture of osteopathic philosophy of wellness, balance, and health. • Develop and implement a faculty and staff resource akin to the WARM program. • Establish baseline for campus wellness and build strategies to increase wellness via: <ul style="list-style-type: none"> ○ Reducing operational and workflow inefficiencies ○ Increasing professional growth and training opportunities ○ Dedicating resources for faculty and staff recognition • Increase opportunities to for balance in work-life and workload with attention to role and scope of work, flexibility, and efficiency. • Assess and advocate for employee workload optimization and satisfaction. • Maintain support for TUCOM and

			TUC mental and physical health resources.
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LOWER	Increase Employee Diversity	5.2 5.5	<ul style="list-style-type: none"> • Define diversity as it applies to COM employees. • Increase qualified applications for employees from the defined diverse populations. • Establish a COM liaison to collaborate with the TUC Offices of DEI and HR to set goals and strategies for recruitment and retention of diverse populations. • Increase diverse representation of all internal stakeholders on COM and institutional committees.
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STRATEGIC INITIATIVE 5: RESEARCH, SCHOLARLY ACTIVITY, AND COMMUNITY HEALTH

PRIORITY LEVEL	OBJECTIVE	COCA ELEMENT(S) ADDRESSED	METRIC OF IMPROVEMENT
HIGHEST	Increase Student Opportunities to Participate in Research and Scholarly Activity	8.4	<ul style="list-style-type: none"> Develop and implement a student/faculty research initiative to increase participation in research activity in the key areas as noted. Demonstrate a 2-3X increase in student presentations of research at local, regional, national, or international conferences. Demonstrate a 3X increase in students listed as authors on publications in research or professional journal.
MIDDLE	Develop Research Collaborations Outside the COM	8.1	<ul style="list-style-type: none"> Develop at least 2-3 new partnerships for research activity.
	Create a Central Bridge Point Between Touro and the Community for Community Service	8.1	<ul style="list-style-type: none"> Advocate, support, and participate in university efforts in the following areas: <ul style="list-style-type: none"> Office of community engagement Community health improvement projects (at least 2) Annual campus interprofessional community events that engage as many student clubs/organizations as possible

	Increase Research in All Key Areas (Biomedical Science, Clinical Science, Education, and OMM/OPP)	8.1 8.3	<ul style="list-style-type: none"> • Demonstrate a 5X increase in research activity in the key areas. • Demonstrate a 5X increase in presentations of research at local, regional, national, or international conferences. • Demonstrate a 5X increase in publications in research or professional journals.
LOWER	Increase Research Funding (Intramural and Extramural)	8.2	<ul style="list-style-type: none"> • Increase student research from 10% to 50% and provide associated intramural and extramural support. • Demonstrate a 25% increase in extramural research funding for the COM.

STRATEGIC INITIATIVE 6: DIVERSITY, EQUITY, AND INCLUSION

PRIORITY LEVEL	OBJECTIVE	COCA ELEMENT(S) ADDRESSED	METRIC OF IMPROVEMENT
HIGHEST	Support diversity of existing and future students	4.1 5.2 5.5 6.4 6.13 10.1	<ul style="list-style-type: none"> • Establish a DEI Resource Center: community-based, restorative justice system for faculty, staff, and students including specific guidelines for students, staff, faculty, and partners. • Increase publicly displayed signage and art which represent DEI values. • Increase promotion and inclusion of DEI principles in curricular and non-curricular activities throughout the continuum of osteopathic medical education. • Ensure all external partnerships and agreements are in alignment with DEI values. • Increase resources and support for DEI initiatives in the COM, including IDEA Committee, dedicated leadership, and collaboration with curricular goals.

MIDDLE	Increase Diversity within the Students, Faculty, and Staff	2.5 5.2 5.5	<ul style="list-style-type: none"> Engage new pipeline/pathway programs identified for diverse recruitment. Perform a review of those pipeline/pathway programs on an annual basis to assess effectiveness and update/modify the programs as necessary. Demonstrate increased percentage of diverse candidates (diversity as defined in Strategic Initiative 2, inclusive of underrepresented minorities (URMs)) selected for interview, matriculation, and hire. Demonstrate increased retention rates of diverse and URM students, faculty, and staff.
			<ul style="list-style-type: none"> Demonstrate number and proportion of diverse faculty, staff, and students in alignment with peer institutions.
	Cultivate an Environment that Promotes a More Inclusive Culture	1.4 2.5 3.1 5.2 5.5 7.1 7.8 9.1	<ul style="list-style-type: none"> Conduct a comprehensive review of TUCOM’s policies, procedures, and publications and modify as appropriate to reflect inclusion. Develop an infrastructure of personnel and data systems to build core expertise within the COM to support the continuity of diversity and inclusion initiatives. Allocate necessary financial resources to invest and sustain effective DEI initiatives. Systematically monitor and adapt to the ongoing diversity climate within the school.

LOWER	Maintain/Adapt	2.5	<ul style="list-style-type: none"> Require enrollment in a DEI micro credential course, such as the AACOM ARP DEI and Health Equity micro credential, and ensure time and resources for completion. Conduct a gap analysis between any purchased materials and ensure consistency with objectives of the curriculum. Continue to improve student training in DEI and structural competency across the continuum of osteopathic medical education.
	/Grow Develop	5.2	
	and/or	5.5	
	Implement	6.7	
	Curriculum and	6.8	
	Training	6.13	
	Supporting	7.6	
Diversity,	7.9		
Equity, and	10.1		
Inclusion			