U.S. Department of Education

Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues

RECOMMENDATION PAGE

1. **Agency:** Council on Education for Public Health (1974/2007)
   (The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)

2. **Action Item:** Compliance Report

3. **Current Scope of Recognition:** The accreditation within the United States of schools of public health and public health programs outside schools of public health, at the baccalaureate and graduate degree levels, including those offered via distance education.

4. **Requested Scope of Recognition:** Same as above.

5. **Date of Advisory Committee Meeting:** December, 2010

6. **Staff Recommendation:** Accept the report.

7. **Issues or Problems:** None

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

Between 1945-1973, the American Public Health Association (APHA), a membership organization for public professionals, accredited graduate programs in public health. In 1974, the APHA and the Association of Schools of Public Health (ASPH), a national association representing deans, faculty, and students of accredited schools of public health, jointly formed the Council on Education for Public Health (CEPH or Council) to conduct accrediting activities. Initially, CEPH limited its focus to schools of public health embedded within colleges and universities. However, in the late 1970's, CEPH responded to requests from practitioners and educators to accredit community health/preventive medicine programs, and to a request from the APHA to accredit community health education programs. The CEPH accredits schools of public health and public health programs outside schools of public health. The agency currently accredits 40 schools of public health and 71 public health programs located in 41 states, plus the District of Columbia and Puerto Rico.

CEPH is a programmatic accrediting agency and as such, does not have to meet the Secretary's separate and independent requirements. The accredited programs use the agency's recognition to establish eligibility to participate in non-HEA federal programs such as those offered under Title VII of the Public Health Services Act, as amended, and the Public Health Training Centers. Graduates of CEPH-accredited schools and programs are also eligible for appointment to the U.S. Public Health Service Commissioned Corps.

Recognition History

The U.S. Commissioner of Education initially recognized the CEPH in 1974 for its accreditation of graduate schools of public health. In 1978, an expansion of the agency's scope included graduate programs in community health education and community health/preventive medicine offered outside of schools of public health. The Council has received continuous and uninterrupted renewal of recognition since 1974.

The agency last appeared before the NACIQI in the spring 2007, for renewal of recognition. In the August 15, 2007 letter, the Secretary renewed recognition for five years and requested the agency to submit an interim report for review at the Fall 2008 NACIQI meeting addressing the following compliance issue:

• The agency needed to demonstrate that it monitors its schools and programs continued compliance with the agency's student achievement standards, specifically its graduation and job placement rates.

Due to the passage of HEOA, the NACIQI did not meet in Fall 2008. In January 2010, as a result of new regulations effective July 1, 2010, the agency was requested to update its interim report and to also address how it monitors the overall growth of institutions/programs and collects headcount enrollment data from them. This updated interim report is the subject of this analysis.

PART II: SUMMARY OF FINDINGS

§602.19 Monitoring and reevaluation of accredited institutions and programs.

> **(b) The agency must demonstrate it has, and effectively applies, a set of monitoring and evaluation approaches that enables the agency to identify problems with an institution's or program's continued compliance with agency standards and that takes into account institutional or program strengths and stability. These approaches must include periodic reports, and collection and analysis of key data and indicators, identified by the agency, including, but not limited to, fiscal information and measures of student achievement, consistent with the provisions of §602.16(f). This provision does not require institutions or programs to provide annual reports on each specific accreditation criterion.**

Previous Issue or Problem: During the spring 2007 review of the agency's petition for continued recognition, the Department staff identified that the agency's written monitoring policy required only accredited public health programs to report annually on student achievement, but they did not require the accredited public health schools to report on student achievement. The Department staff analysis concluded that the agency could not effectively monitor the public health schools throughout the accreditation period without also requiring these schools to report on student achievement. As a result, CEPH revised the reporting requirements for the schools of public health to include graduation and job placement rates in their annual reports beginning in December 2007. The agency also revised the annual report forms that accredited public health programs prepared to conform to the same student achievement data reported by the public health schools, creating consistency in the information reported about job placement and graduation rates across its accredited programs and schools of public health. The agency was required to demonstrate its implementation of its revised annual report forms in its monitoring process and report in an interim report to be reviewed by NACIQI at its fall 2008 meeting. In August 2008, the HEOA was enacted and NACIQI meetings were not held pending rulemaking and the constitution of a new NACIQI.

Rulemaking resulted in changes to §602.19, and the agency is required to demonstrate compliance with the new regulations in its interim report, in addition to addressing the issues identified during the spring 2007 review.

The agency meets the requirements of this section of the criteria based on the following:

In response to the new regulatory requirements of §602.19, the Council has identified a variety of monitoring and evaluation approaches it uses effectively to identify continued compliance and issues of noncompliance with its accreditation standards by its accredited programs and schools. The agency's accreditation staff assesses the information against established triggers and forwards issues of concern and/or non-compliance to the Council. Key components of the agency's monitoring approach include-

1. The agency requires an annual report from each program and school of public health. The report form(s) are comprehensive and specific and include the key data and indicators (including student achievement, financial information, and headcount enrollment by program beginning in 2010) in the information it collects relative to agency standards thus enabling the agency to monitor changes in institution and program characteristics.

2. Although a programmatic accreditor and not an institutional accreditor, the Council has also established substantive change policies and procedures that require prior approval and which may include, as appropriate, on-site consultation or an abbreviated focused review on limited issues as another effective approach for monitoring changes at its accredited programs and schools of public health.

3. The agency also applies interim reporting requirements, investigates complaints and information received from outside sources, etc.

The agency provided documentation that annual reports and substantive changes are reviewed by the Council at its regularly scheduled meetings.

(c) Each agency must monitor overall growth of the institutions or programs it accredits and, at least annually, collect headcount enrollment data from those institutions or programs.

The agency meets the requirements of this section of the criteria based on the following-

CEPH has written procedures guiding the collection and review of headcount enrollment data annually. The agency has procedures for the review of the data that enables the agency to compare data with the previous year's data. The agency has established a trigger (45 percent increase in headcount enrollment) that will generate a report containing data elements, including growth or decline that the CEPH Council will assess at its next meeting and which may trigger action such as requesting the school or program to provide additional information either to clarify the enrollment data or demonstrate adequate faculty and other resources exist at acceptable levels to provide quality education for all enrolled students. After obtaining the additional information, the agency may ask for additional written reporting, conduct a visit by a staff member or CEPH member, or require an abbreviated or a full review earlier than stipulated at the time of the last accreditation decision. The agency provided documentation of its collection of this information.

The agency's policies and procedures are effective mechanisms for the collection and processing of headcount data using identified trigger points for obtaining additional information and additional monitoring.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third-party comments regarding this agency.