U.S. Department of Education

Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues

RECOMMENDATION PAGE

1. **Agency:** American Speech-Language-Hearing Association (1967/2003)
   (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:** Petition for Continued Recognition

3. **Current Scope of Recognition:** The accreditation and preaccreditation (Accreditation Candidate) throughout the United States of education programs in audiology and speech-language pathology leading to the first professional or clinical degree at the master's or doctoral level, and the accreditation of these programs offered via distance education.

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

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

6. **Staff Recommendation:** Continue the agency's recognition and require that the agency submit a compliance report in 12 months that demonstrates the agency's compliance with the issues identified in this report.

7. **Issues or Problems:**

• The agency must provide documentation that it provides programs with a detailed written report assessing programs' performance with respect to student achievement that includes the programs' use of the all of the student outcome data and the results of its assessment of program effectiveness for continuous improvement. [§602.17(f)]

• The agency needs to demonstrate the specific triggers that will indicate whether a program's headcount growth does or does not require the agency to determine whether the program maintains educational quality. [§602.19(c)]

• The agency needs to demonstrate that it complies with its written policies and procedures to submit notifications to the Secretary, appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and the public in a timely manner. [§602.26(a)]

• The agency needs to demonstrate that it consistently implements its written policies of sending notifications of negative accreditation decisions to the entities named in this criterion within the specified timeframes. [§602.26(b)]

• The agency needs to demonstrate that it consistently adheres to its written policies and this criterion to notify the public of negative decisions within 24 hours of notifying the program. [§602.26(c)]

• The agency must demonstrate that it applies its policy of notifying the entities in this criterion when programs voluntarily withdraw or allow its accreditation to lapse. [§602.26(e)]

• The agency needs to revise its policy to include a statement as to why the actions of the state agency or other accrediting agency do not preclude the agency from granting accreditation or preaccreditation to a program. [§602.28(c)]

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The American Speech-Language-Hearing Association, Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA) is a national accrediting agency of graduate education programs in audiology or speech-language pathology. The CAA currently accredits or or preaccredits 319 programs (247 in speech-language pathology and 72 in audiology)in 48 states, the District of Columbia, and Puerto Rico.

Recognition History

The U.S. Commissioner of Education first recognized the American Speech Language and Hearing Association's (ASHA's) Educational Standards Board (Board) in 1967. Since that time, the Secretary of Education has periodically reviewed the Board's successor, the Council on Academic Accreditation (CAA), and granted continued recognition. The National Advisory Committee on Institutional Quality and Integrity (NACIQI) last reviewed the CAA at its June 2008 meeting. The last full review of the agency took place at the June 2008 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). Both the Department and the NACIQI recommended that the agency's recognition be renewed for a period of five years. The Secretary had not made a final decision prior to passage of the Higher Education Opportunity Act, which contained a number of provisions related to accrediting agency recognition that were effective upon enactment. Subsequently, new regulations were developed, effective July 1, 2010. As a consequence, the agency was required to submit an updated petition for review by staff and NACIQI.

In conjunction with that review, Department staff observed a Council decision-making meeting in February 2008 and reviewed an on-site evaluation of a doctoral program in audiology in April 2008.

The Department received no third-party comments in connection with the agency's current petition for continued recognition.

PART II: SUMMARY OF FINDINGS

§602.17 Application of standards in reaching an accrediting decision.

The agency must have effective mechanisms for evaluating an institution's or program's compliance with the agency's standards before reaching a decision to accredit or preaccredit the institution or program. The agency meets this requirement if the agency demonstrates that it--

(f) Provides the institution or program with a detailed written report that assesses--

(1) The institution's or program's compliance with the agency's standards, including areas needing improvement; and
(2) The institution's or program's performance with respect to student achievement;

and

The agency's site team report complies with the requirement under this section to provide the program with a detailed written report that assesses the program's performance and compliance with the agency's standards, including areas needing improvement. The report also partially addresses the program's performance with respect to student achievement. This assessment can be found primarily under the agency's Assessment standards. While the report describes the various ways in which the program assesses student performance, it does not provide in detail an assessment of the program's performance with respect to student achievement. In particular, there is no discussion in the team's report of the required data for completion, employment and Praxis examination rate, including whether the program met or exceeded the agency-established thresholds. The agency's written procedures ensure a consistent format and timely issuance of the reports.

Staff determination: The agency does not meet the requirements under this section. It must document that it provides programs with a detailed written report assessing the program's performance with respect to student achievement.

Analyst Remarks to Response:

In its response to the draft staff analysis [Section 602.16(a)(1)(i)], the agency indicates that it has expanded its site visit worksheet template to include statements to prompt site visit members to assess program compliance related to the established benchmarks for completion, employment, and Praxis examination rates. While the agency has provided a template, it has not provided evidence of its implementation documenting the agency's expanded assessment of the data for completion, employment, and Praxis examination rates, including whether the program met or exceeded the agency-established thresholds. The agency must include in the detailed report on student achievement a discussion of other indicators of student achievement used by the program and the program's use of the data for improvement since the agency standard requires the program to use the results of its assessment of program effectiveness for continuous improvement.

Staff Determination: The agency does not meet the requirements of this section. It must provide documentation that it provides programs with a detailed written report assessing programs' performance with respect to student achievement that includes the programs' use of the all of the student outcome data and the results of its assessment of program effectivess for continuous improvement.

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§602.19 Monitoring and reevaluation of accredited institutions and programs.

(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 CAA reports that it collects data annually on the number of students enrolled in accredited programs through the Annual Report form. Evidence of this was found in Exhibit 24B, rather than in the exhibit cited in the narrative. The agency reports that the CAA reviews all of the annual reports and considers whether the reported enrollment will have an impact on the program's compliance with other standards. While the agency provided information about its procedures for the review of the data that enables the agency to compare data with the previous year's data, it did not indicate that it has established a trigger or other means for signaling need for further action, nor provided documentation of its review.

Staff Determination: The agency does not meet the requirements of this section of the criteria. The agency needs to document that it analyzes the enrollment data as part of its ongoing monitoring.

Analyst Remarks to Response:

The agency indicated that it will present the Department's concerns to its CAA on November 17, 2010. During the November meeting the CAA is expected to consider its expectation/threshold for "significant growth" as it relates to this monitoring review activity. The agency does not meet the requirements of this section, at this time, and will need to provide evidence of its analysis of the enrollment data against agency-defined triggers as part of its ongoing monitoring.

Staff Determination: The agency does not meet the requirements of this section. It needs to demonstrate the specific triggers that will indicate whether a program's headcount growth does or does not require the agency to determine whether the program maintains educational quality.

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§602.26 Notification of accrediting decisions

The agency must demonstrate that it has established and follows written procedures requiring it to provide written notice of its accrediting decisions to the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and the public. The agency meets this requirement if the agency, following its written procedures--

(a) Provides written notice of the following types of decisions to the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and the public no later than 30 days after it makes the decision:

(1) A decision to award initial accreditation or preaccreditation to an institution or program.
(2) A decision to renew an institution's or program's accreditation or preaccreditation;

The agency has written policies/procedures requiring the agency to give notice of accrediting actions to the four entitles described in this criterion within the timeframe specified in this criterion. However, the agency did not provide documentation demonstrating that it has implemented the policy.

Staff Determination: The agency does not meet the requirements of this section of the criteria. It needs to provide examples of correspondence or other documentation demonstrating that it routinely notifies the listed entities of positive accrediting decisions within the specified timeframes.

Analyst Remarks to Response:

The agency has not demonstrated that it adheres to its written policies to notify all listed entities of its positive accreditation decisions within 30 days. While the CAA notified the program and posted its accreditation decisions on the Web in timely fashion, it has not demonstrated that it timely sends notifications of positive decisions to the Secretary, appropriate State licensing or authorizing agency, the appropriate accrediting agencies. The agency must demonstrate that it follows the timelines in this criterion.

Staff Determination: The agency does not meet the requirements of this section. It needs to demonstrate that it complies with its written policies and procedures to submit notifications to the Secretary, appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and the public in a timely manner.

(b) Provides written notice of the following types of decisions to the Secretary, the appropriate State licensing or authorizing agency, and the appropriate accrediting agencies at the same time it notifies the institution or program of the decision, but no later than 30 days after it reaches the decision:

(1) A final decision to place an institution or program on probation or an equivalent status.

(2) A final decision to deny, withdraw, suspend, revoke, or terminate the accreditation or preaccreditation of an institution or program;

(3) A final decision to take any other adverse action, as defined by the agency, not listed in paragraph (b)(2) of this section;

The agency has written policies/procedures requiring the agency to give notice of accrediting actions to the four entitles described in this criterion within the timeframe specified in this criterion. However, the agency did not provide documentation demonstrating that it has implemented the policy.

Staff Determination: The agency does not meet the requirements of this section of the criteria. It needs to provide examples of correspondence or other documentation demonstrating that it routinely notifies the listed entities of negative accrediting decisions within the specified timeframes.

Analyst Remarks to Response:

The documentation provided by the agency shows that it did not adhere to its policies to notify the Secretary, appropriate State licensing or authorizing agency, the appropriate accrediting agencies within 30 days following its decision to place a program on probation.

Staff Determination: The agency does not meet this requirement. It needs to demonstrate that it consistently implements its written policies of sending notifications of negative accreditation decisions to the entities named in this criterion within the specified timeframes.

(c) Provides written notice to the public of the decisions listed in paragraphs (b)(1), (b)(2) and (b)(3) of of this section within 24 hours of its notice to the institution or program;

The agency has written policies/procedures requiring the agency to give notice of to the public of negative accrediting decisions within the timeframe specified in this criterion. However, the agency did not provide documentation demonstrating that it has implemented the policy.

Staff Determination: The agency does not meet the requirements of this section of the criteria. It needs to provide documentation demonstrating that it routinely notifies the public of negative accrediting decisions within the specified timeframes.

Analyst Remarks to Response:

In response to the draft staff analysis the agency needed to demonstrate that it had implemented its written policy to notify the public within 24 hours of its notice to the program of a negative decision. The documentation of implementation showed that the agency, notified the program in writing on August 1, 2010 but did not place the negative decision on its website until August 20, 2010.,. The evidence shows that the agency does not follow its written policies and failed to meet the timelines required by this criterion.

Staff Determination: The agency does not meet the requirements of this section. It needs to demonstrate that it consistently adheres to its written policies and this criterion to notify the public of negative decisions within 24 hours of notifying the program.

(e) Notifies the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public if an accredited or preaccredited institution or program--

(1) Decides to withdraw voluntarily from accreditation or preaccreditation, within 30 days of receiving notification from the institution or program that it is withdrawing voluntarily from accreditation or preaccreditation; or

(2) Lets its accreditation or preaccreditation lapse, within 30 days of the date on which accreditation or preaccreditation lapses.

The agency has a written policy that addresses the requirement to send notifications to the entities named in this criterion, within 30 days of receiving the notification. As this is not a new requirement, the agency must demonstrate that it has made appropriate notification.

Staff Determination: The agency does not meet the requirements of this section of the criteria. It must provide evidence that it applies this requirement.

Analyst Remarks to Response:

In the agency's petition narrative, the agency states that, "Also, as of December 31, 2006, the CAA discontinued accrediting master's programs in audiology and the CAA, therefore, removed any accreditation status from those programs, which voluntarily withdrew from accreditation, because they were no longer eligible for CAA accreditation."

The intent of this criterion is to ensure that the accreditor is sharing information timely on the correct accreditation status of programs. In this instance (the programs' accreditation status changed), the accreditor would be expected under this recognition criterion to notify the Department of the status change of these programs. By its response, it is clear that the agency has not adhered to its policy.

Staff Determination: The agency does not meet the requirements of this section. The agency must demonstrate that it applies its policy of notifying the entities in this criterion when programs voluntarily withdraw or allow its accreditation to lapse.

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§602.28 Regard for decisions of States and other accrediting agencies.

(c) The agency may grant accreditation or preaccreditation to an institution or program described in paragraph (b) of this section only if it provides to the Secretary, within 30 days of its action, a thorough and reasonable explanation, consistent with its standards, why the action of the other body does not preclude the agency's grant of accreditation or preaccreditation.

Although the agency reports that it has not exercised the policy developed to handle this situation, its policy fails to require the agency to provide the Secretary, within 30 days of any action it takes, a thorough explanation giving the rationale for its accrediting actions, consistent with its standards. The agency must incorporate this requirement in its operating policies/procedures.

Staff Determination: The agency does not meet the requirements of this section of the criteria. It must incorporate this requirement in its operating policies/procedures and demonstrate application, as applicable.

Analyst Remarks to Response:

In the response to the draft staff analysis, the agency needed to revise its policy to clearly reflect that the agency's rationale to the Secretary will include an explanation of why "the action of the other body does not preclude the agency's grant of accreditation or preaccreditation". The agency's current policy, which requires it to provide a thorough and reasonable explanation of why it has awarded or continued accreditation or candidacy to a program that has been the subject of an adverse action, could result in insufficient information being provided to the Secretary regarding the agency's consideration of the findings of the other body.

Staff Determination: The agency does not meet the requirements of this section. It needs to revise its policy to include a statement as to why the actions of the state agency or other accrediting agency do not preclude the agency from granting accreditation or preaccreditation to a program.

PART III: THIRD PARTY COMMENTS

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