

## **Public Disclosure of Accreditation Decisions: Public Notice and Call for Comment**

The APA Commission on Accreditation (CoA) is recognized by the United States Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA). The APA's scope of recognition includes the accreditation in the United States of doctoral programs in health service psychology (i.e., clinical, counseling, and school psychology, combinations of two or more of these practice areas and other developed practice areas in health service psychology); doctoral internship programs in health service psychology; postdoctoral residency programs in health service psychology; and preaccreditation of doctoral programs in health service psychology, doctoral internship programs in health service psychology and postdoctoral residency programs in health service psychology. As such the CoA's Standards must align with the recognition criteria of both the USDE and CHEA.

In order to comply with new criteria established by external bodies that recognize accrediting agencies, the CoA is to make publicly available all accreditation decisions. To meet this requirement, the APA-CoA has modified its decision disclosure policies and practices. For example, recent technical modifications have been made to the accredited program directory to add the specific standards on which a program is required to provide ongoing reporting. In addition, all CoA decisions, including accreditation decisions, deferrals, and adverse actions are to be disclosed.

These changes have resulted in modifications to Section 5 of the *Accreditation Operating Procedures of the Commission on Accreditation (AOP)* and Implementing Regulations (IR) D.8-1, D.8.1(a), and D.8-2. In addition to the change in decision reporting, lists of accredited programs will be published in the directory on the accreditation website; this change is also incorporated into the AOP and IRs.

In accordance with the APA "Policies for Accreditation Governance" and the US Department of Education regulations for notice and comment, the CoA is making the changes available for a period of public review and comment. An electronic-based system is set up to collect comments on this AOP change. The comment period is scheduled to begin at **5:00 pm Eastern Daylight Time on September 16, 2019 and will continue through 5:00 pm Eastern Daylight Time on October 15, 2019.**

Comments and other information in the public comment system, including the users' identity, will be public. Email addresses used for registration will be kept confidential. All comments must be received prior to the **October 15, 2019** deadline, be specific to the proposed AOP and IR revisions, and submitted in the public comment system.

On behalf of the CoA, thank you in advance for your review and comments. Please contact the APA Office of Program Consultation and Accreditation with any questions or concerns. Address: 750 First Street, N.E., Washington, DC 20002-4242; Phone: (202) 336-5979; Email: [apaaccred@apa.org](mailto:apaaccred@apa.org); Web: <http://www.apa.org/ed/accreditation>.

**Public Comment: Changes to Procedures regarding disclosure of Commission on Accreditation decisions**

The modifications to the decision disclosure policies and practices have been made to the accredited program directory to add the specific standards on which a program is required to provide ongoing reporting. In addition, all CoA decisions, including accreditation decisions, deferrals, and adverse actions are to be disclosed. These changes have resulted in modifications to Section 5 of the Accreditation Operating Procedures of the Commission on Accreditation (AOP) and Implementing Regulations (IR) D.8-1, D.8.1(a), and D.8-2. In addition to the change in decision reporting, lists of accredited programs will be published in the directory on the accreditation website; this change is also incorporated into the AOP and IRs. These changes are presented as follows.

## **5. CONFIDENTIALITY AND PUBLIC DISCLOSURE OF INFORMATION**

An up-to-date listing of all applicant programs will be regularly available on the Office of Program Consultation and Accreditation website. Included in all published materials will be the identity of programs whose accreditation has been denied, or revoked, as well as those voluntarily withdrawing from accredited status. The CoA will make public notice of all accreditation decisions no later than 30 days following the CoA meeting at which the decisions were made. In the case of programs for which appealable decisions have been reached, and appeal has been filed, the CoA will note that the decision is under appeal.

~~After each meeting of the CoA, the published lists of accredited programs will be updated as necessary by an addendum of decisions and will also be available through other means as appropriate. CoA decisions including accreditation actions, deferrals, and adverse actions, and a list of any standards to which a program is required to respond, will be disclosed in the directory of accredited programs on the accreditation website.~~ The CoA will share the accreditation status of programs with regional and specialized accrediting bodies as appropriate. All other information, and the records used in accreditation decisions, will be kept confidential by the CoA.

The Commission will identify and make public, as appropriate, all applicant programs applying for initial review by the CoA for “accredited, on contingency” or “full accreditation” to allow for third-party comment.

The CoA will notify the Department of Education of any accredited program that the CoA has reason to believe is failing to comply with financial aid responsibilities as outlined in Title IV of the Higher Education Act, or any purported fraud and abuse by accredited programs, and its reasons for such concern. The CoA also will take action to correct in a timely manner any incorrect or misleading information released by an accredited program about the accreditation status of the program, ~~the contents of the site visit report,~~ and the CoA’s accrediting actions with respect to the program.

In addition, the Office of Program Consultation and Accreditation will make disclosure as required by the U.S. Department of Education and in those instances when the CoA is legally required to disclose such information.

***D.8. Regulations related to confidentiality and disclosure of information used in the accreditation process***

**D.8-1. Confidentiality and Public Disclosure of Information**

*(Accreditation Operating Procedures, Section 8; revised October 2004; February 2016, July 2019)*

~~An annual Lists of both~~ the status of accredited programs and the year of each program's next scheduled site visit as well as of all accreditation decisions (as defined in AOP 8.2 D, I, and P) ~~made by the CoA~~ and voluntary withdrawals from accredited status will be published ~~in the accreditation newsletter on the accreditation website annually. An updated list that includes changes in status or new programs since the previous annual list will be published midyear.~~ In addition, after each meeting of the CoA, the published lists of accredited programs will be updated as necessary by an addendum of all accreditation decisions (as defined in AOP 8.2 D, I, and P) and voluntary withdrawals from accredited status, the CoA will make public notice of such decisions and actions no later than 30 days after the meeting, the Department of Education will be notified of such decisions and actions, and the decisions and actions will also be available through other means as appropriate.<sup>11</sup>

In the case of programs for which appealable decisions have been reached and the time for submitting an appeal has not run out, the CoA will note that the decision is appealable. If an appeal has been filed, the CoA will note that the decision is under appeal. The CoA will share the accreditation status of programs with regional and specialized accrediting bodies, the public, and state licensing boards, as appropriate.

The CoA will notify the U.S. Department of Education of any accredited program that the CoA has reason to believe is failing to comply with financial aid responsibilities as outlined in Title IV of the Higher Education Act, or any purported fraud and abuse by accredited programs, and its reasons for such concern. The CoA also will take action to correct in a timely manner any incorrect or misleading information released by an accredited program about the accreditation status of the program, ~~the contents of the site visit report,~~ and the CoA's accrediting actions with respect to the program.

In addition, the Office of Program Consultation and Accreditation will make any additional disclosures required by the U.S. Department of Education and the Council for Higher Education Accreditation, and in those instances when the CoA is legally required to disclose such information.

All other information, and the records used in accreditation decisions, will be kept confidential by the CoA.

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<sup>11</sup> For the most current information on accredited program status, please consult the lists of accredited doctoral, internship, and postdoctoral programs on the CoA's Web site at [www.apa.org/ed/accreditation/programs/index.aspx](http://www.apa.org/ed/accreditation/programs/index.aspx).

### **D.8-1(a). Timeframe for Public Notice of Adverse Decisions and Voluntary Withdrawals**

(Commission on Accreditation, April 2007; revised February 2016, [July 2019](#))

In accordance with the *Accreditation Operating Procedures* (AOP), the Commission on Accreditation (CoA) provides a list of all currently accredited programs, as well as a list of those programs applying for initial accreditation, on ~~its~~ [the APA accreditation website](#).

The CoA has a responsibility to provide the public with accurate information regarding the current accreditation status of programs. This information is pertinent to students for the purpose of making informed decisions about entering programs. There are 4 instances that involve notifying the public that a program is being removed from the [APA accreditation website](#):

#### Final Adverse Decisions

Implementing Regulation D 8-2 addresses policies for informing the public of adverse accreditation decisions.

#### Programs Deemed to have Withdrawn from Accreditation

The CoA has the authority to delete a program from the list of accredited programs when the CoA concludes that the program is no longer in existence, in accordance with the policies listed in AOP Section 1.3. The ~~CoA Web site~~ [accreditation website](#) will list such programs as being deemed to have withdrawn along with the effective date of such status.

#### Voluntary Withdrawals from Accreditation

An accredited program may withdraw from accredited status by providing the CoA with notice of its intent in writing (see AOP Section 1.3). The [accreditation website](#) will include the names of any programs voluntarily withdrawing from accredited status along with the date such withdrawal is effective.

#### Voluntary Withdrawal of Initial Application

Programs applying for initial accreditation have the option of withdrawing their applications at any time prior to the final decision by the CoA (see AOP Section 1.3). As the CoA provides a public list of programs submitting applications for initial accreditation, it will also publicly indicate the final status of those applications. When programs voluntarily withdraw their applications for accreditation, the ~~CoA Web site~~ [accreditation website](#) will note those applications as voluntarily withdrawn.

In each of the above cases, the CoA will provide appropriate public notice of the program's status prior to removing it from the list of accredited programs or from the list of applicants. Programs in any of these categories will remain listed on the [accreditation website](#) for 1 calendar year beyond the effective date of such status.

In the case of programs voluntarily withdrawing, being deemed to have withdrawn, or having their accreditation revoked, this status will also be listed ~~in the following December's edition of the *American Psychologist*~~ [on the accreditation website](#). These policies are intended to keep the public informed about the accurate status of accredited programs, as well as to provide a historical record of accredited programs for use by licensing and credentialing bodies.

**D.8-2. Procedures for Notification of CoA Actions in Accordance with the Secretary of Education’s Standards for Recognition of Accrediting Agencies**

(Commission on Accreditation, October 1997; revised October 2004, July 2009, July 2010, July 2011, February 2016, July 2019)

This implementation procedure outlines the steps that will be taken by the CoA, consistent with the Secretary’s requirements and with Section 8 5 (Confidentiality and Public Disclosure of Information) of the CoA’s *Accreditation Operating Procedures*, to provide information on CoA activities, actions and decisions to the Secretary, State agencies, other accrediting agencies, and the public.

1. Information to the U.S. Department of Education (USDE)

Item	Appropriate Section Reference in USDE Regulations	How Often and/or When
Lists of Accredited Programs	602.27(b)	Annually <del>(when published, usually January)</del>
CoA annual report (contains the CoA’s accrediting actions as defined in AOP <del>4.2</del> <u>8.2 D, 8.2 I, and 8.2 P</u> for that year)	602.27(a)	Annually <del>(when published)</del>
Summary of CoA’s major accrediting activities during previous year (annual data summary)	602.27(c)	If requested
The name of any accredited program that the CoA has reason to believe is failing to comply with Title IV, HEA program responsibilities or is engaged in fraud or abuse, and the CoA’s reason for such concern	602.27(e)	As needed
Notification of any proposed change in policies, procedures, or accreditation standards that might alter the CoA’s scope of recognition or compliance with the criteria for recognition	602.27(d)	As needed
Notification of decision to award initial accreditation or decision to renew accreditation	602.26(a)(1), and (a)(2)	No later than 30 days after decision
Final <sup>12</sup> decision to deny or revoke accreditation, deny a site visit to an applicant program, or place program on “accredited, on probation” status	602.26(b)(1), and (2)	At same time program is informed, but no later than 30 days after decision is final

<sup>12</sup> The term “final” as used throughout this Implementing Regulation encompasses the following: In the case of appealable decisions (denial of accreditation or a site visit to an applicant program, probation, or revocation), the CoA’s accreditation decisions become final either (1) 30 days after the program is notified of the CoA’s decision and the program elects not to appeal, or (2) if the program elects to appeal the decision, after receipt of the appeal panel report if the appeal panel upholds the CoA’s decision.

Item	Appropriate Section Reference in USDE Regulations	How Often and/or When
All accreditation decisions as defined in AOP 8.2 D, I, and P with appeal status	Per request of the Department of Education	No later than 30 days after the CoA meeting in which the decision is made
Program decision to withdraw voluntarily from accreditation	602.26(e)(1)	No later than 30 days after notification is received by the CoA
Program decision to allow accreditation to lapse	602.26(e)(2)	No later than 30 days after date on which accreditation lapses
Brief statement summarizing the reasons for denial or revocation of a program's accreditation or denial of a site visit / program's comments on action (if any)	602.26(d)	No later than 60 days after decision is final

## 2. Publicly-Available Information

The following information is available in printed form to all interested parties. Unless otherwise noted, items below appear in electronic form on the [accreditation website](#).

- Current lists of accredited internship and doctoral programs<sup>Ⓜ</sup>  
~~(NOTE: Supplements to the printed lists, published 30 days after each CoA meeting, provide updates on accreditation status, including newly accredited and reaccredited programs, programs voluntarily withdrawing, and all accreditation decisions as defined in AOP 4.2 by the CoA. The lists maintained on the Web site are updated within 30 days after each CoA meeting and also incorporate all accreditation decisions made by the CoA).<sup>13</sup> Final decisions to deny or revoke accreditation, deny a site visit to an applicant program, or place a program on "accredited, on probation status" will be updated within 24 hours of notice to the program.~~
- Program review cycles for current year<sup>Ⓜ</sup>
- Standards of Accreditation, Accreditation Operating Procedures, and Implementing Regulations<sup>Ⓜ</sup>
- List of current CoA members, including their academic and professional qualifications and relevant employment/organizational affiliations<sup>Ⓜ</sup>
- List of current Office staff, including the academic and professional qualifications of the principal administrative staff<sup>Ⓜ</sup>
- Important accreditation dates for the current year, including CoA meeting dates<sup>Ⓜ</sup>
- A statement of reasons for denial or revocation of accredited status or denial of a site visit, in accordance with CoA procedure for notice of such actions<sup>Ⓜ</sup>
- In addition to being contained on website and in other published materials, upon request, a program decision to withdraw voluntarily from accreditation 30 days or more after notification is received by CoA
- Upon request, a program decision to allow accreditation to lapse

<sup>13</sup>~~In the case of programs for which appealable decisions have been reached and the time for submitting an appeal has not expired, the CoA will note in its materials that the decision is appealable. If an appeal has been filed, the CoA will note that the decision is under appeal.~~

- CoA annual report, which includes CoA membership composition and diversity, a summary of program review decisions, policy changes, and other CoA activities throughout the year\*
- When published, aggregate statistics on accredited programs drawn from the Annual Report Online

### 3. Information to State Licensing Boards

All state psychology licensing boards will receive the following:

- Updated list of accredited doctoral and internship programs (annually, ~~in January~~)
- Updated ~~Accreditation Guidelines/Principles and Procedures~~ Standards of Accreditation and Accreditation Operating Procedures (following publication of updated versions)
- CoA annual report (annually, ~~when published~~)

### 4. Information to Other Accrediting Agencies

All accrediting agencies that are currently or were previously recognized either by the Secretary of Education or the Commission on Recognition of Postsecondary Accreditation (CORPA)/Council on Higher Education Accreditation (CHEA); and/or are members of the Association of Specialized and Professional Accreditors (ASPA), will receive the following information:

- CoA annual report (annually, ~~when published~~)
- Updated list of accredited doctoral and internship programs (annually, ~~in January~~)
- Updated Standards of Accreditation and Accreditation Operating Procedures (following publication of updated versions)
- ~~Updated Accreditation Standards and Procedures (following publication of updated versions)~~

In addition, the regional or national body that accredits any institution housing a program and the State agency that authorizes that institution (doctoral program only) will be notified of the CoA's action with regard to that program, as follows:

- CoA decisions to award initial accreditation or renew accreditation: no later than 30 days after decision
- Final decisions of "accredited, on probation" status, denial of a site visit, or denial or revocation of accreditation: at the same time the program is informed but no later than 30 days after decision becomes final
- A statement of reasons for denial or revocation of accreditation or denial of a site visit in accordance with Implementing Regulation D.8-4.
- Decisions by accredited programs to voluntarily withdraw from accreditation: no later than 30 days after CoA is notified
- Decisions by accredited programs to allow accreditation to lapse: no later than 30 days after the date on which accreditation lapses.
- Upon request, CoA will share with the institutional accrediting agency or State approval agency information about the accreditation status and any adverse action it has taken against such a program.