

# ASPA

Association of Specialized and Professional Accreditors

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October 2005

Margaret Spellings  
US Secretary of Education  
400 Maryland Ave, SW - FOB-6  
Washington, DC 20202

Dear Secretary Spellings:

The members of ASPA represent nearly 50 different professional fields or disciplines (see enclosed membership roster). The accreditor members have a long-standing commitment to good practice in accreditation (see enclosed member *Code of Good Practice* adopted in 1995). ASPA members, following consultation with educators, practitioners, representatives of the public and (if applicable) the licensing community, set educational standards that are used as the basis for in-depth on-site reviews of more than 15,000 accredited educational programs or schools located from coast-to-coast. ASPA member accrediting bodies review each program they accredit, evaluate the extent to which a program meets published standards and take interim monitoring steps to ensure that students have an opportunity to receive an education that prepares them for successful work in their chosen fields.

Members of ASPA participate in rigorous reviews of their own processes and procedures through the recognition processes conducted by The Council for Higher Education Accreditation (CHEA) and/or the US Department of Education. ASPA member accreditors have participated in past reauthorizations of the Higher Education Act (HEA) and are once again following the current reauthorization with interest and concern. Members of ASPA understand that the intent of Congress as it relates to accrediting organizations is subsequently translated into regulation. The resulting *Criteria for Recognition of Accrediting Agencies* is implemented by staff of the US Department of Education as they conduct their reviews of participating accrediting organizations.

The process of reauthorization and the subsequent negotiated rule-making are fair in that they provide for healthy debate and allow input from many constituencies, including the accrediting organizations who will be directly affected by the end result - i.e., by the recognition criteria. However, when the Department changes an agreed-upon interpretation of regulations or imposes additional requirements by interpreting existing regulations in new ways, there is no opportunity for input or discussion. The Department of Education has no process by which accreditors are provided with an opportunity to share their direct experience or to point out the potential unintended consequences of such new interpretations or requirements. In fact, accreditors are not even informed about such changes. Nearly always, they learn that something has changed when

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they are cited for non or partial-compliance with an existing criterion; frequently this criterion is one with which they were found to be in compliance the last time they were reviewed under the same regulations. Equally important, because the rest of the accreditation community is never officially informed of such changes, they are delayed in making appropriate adjustments if needed. I hope you can understand the concern, distress and frustration that this "regulatory creep" and lack of communication generate.

There are many valid reasons for changes to be made to regulations. Yet, when changes are not discussed or announced, practice has shown that those affected by the changes find out about them in the context of their recognition reviews or the reviews of their colleagues. Because all accrediting organizations are reviewed individually and because so much is at stake for each accreditor, this practice prevents any opportunity for open discussion and frank feedback. Fairness and due process protections are ignored. There is no opportunity to point out the downside or potential unintended consequences of a proposed change. In short, accreditors are treated by the Department in ways for which they would be cited by the Secretary if they were to treat their accredited schools or programs in the same manner.

During my ten years as executive director of ASPA, I have seen this happen time and time again, but never to the extent that I have been witnessing during the past two or three years. It is very distressing to see the Department of Education bow to pressure from the Office of the Inspector General or other entities by imposing new interpretations or requirements on recognized accreditors without any prior announcements or opportunities for comment. A few specific examples follow. In each case, the affected accreditors learned of a change when they were cited in the department staff analysis for being out of compliance.

- (1) mandating changes in the required composition of on-site review teams by changing agreed upon definitions of an educator and a practitioner. [See Part 602 - Secretary's Recognition of Accrediting Agencies; Subpart B - The Criteria for Recognition; §602.15(a)(4)]
- (2) requiring a site visit at the mid-point of the period of accreditation to monitor institutions/ programs (reluctantly USDE staff conceded there are other ways to effectively monitoring institutions/programs). [See §602.19]
- (3) requiring site visit teams to review the record of student complaints while on-site rather than the complaints that are received by the accrediting organization. [See §602.16(a)(1)(ix)]
- (4) requiring accreditors to create different curricular standards for different degree levels within a profession when there is agreement that one set is sufficient. [See §602.16]
- (5) requiring that accreditors set bright line, numeric, threshold standards for student achievement when this is not required in either statute or regulation and when many accreditors have demonstrated great success using competency-based results-focused standards. [See §602.16(a)(1)(i)]

In addition, ASPA's accrediting organizations have seen apparent inconsistencies in recommendations and staff analysis reports related to what appear to be similar situations. If the Department were meeting regularly with accreditors it is highly likely that some of these situations could be explained and diffused.

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ASPA asks that you take a stand in support of informed participation and against "regulatory creep." When the Department sees an emerging issue and believes that a status quo interpretation is not sufficient, we ask that you direct staff to convene the accreditation community for a discussion of the problem and offer the community an opportunity to comment on any proposals for change. ASPA would be pleased to offer time for such discussions as a regular part of its Spring and Fall meetings. Likewise, time could be scheduled before or after the spring or fall NACIQI meetings which some accreditors routinely attend. In cases where more timely action is needed, consultation could take place by one or several telephone conference calls.

ASPA stands ready to work with you and the Department to improve channels of communication. Your *Criteria* require that recognized accreditors provide such opportunities for input to their accredited programs or schools. Please take steps to ensure that similar opportunities are provided to the recognized accreditors.

Sincerely,



Cynthia A. Davenport  
Executive Director, ASPA

enclosures: (also available on the ASPA web site - [www.aspa-usa.org](http://www.aspa-usa.org))  
Membership Roster; ASPA-member *Code of Good Practice*

cc: Sally L. Stroup, Assistant Secretary for Postsecondary Education  
John Barth, Director, Accreditation & State Liaison  
Carol Griffiths, Chief, Accrediting Agency Evaluation  
Robert Andringa, Chair, NACIQI  
Bonnie LeBold, NACIQI Executive Director  
ASPA Board of Directors  
ASPA Membership

# ASPA Membership Roster

FY2005 - 2006

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<b>ACUPUNCTURE</b>	Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM); Greenbelt, MD
<b>ALLIED HEALTH</b>	Commission on Accreditation of Allied Health Education Programs (CAAHEP); Clearwater, FL
<b>ARCHITECTURE</b>	National Architectural Accrediting Board (NAAB); Washington, DC
<b>ART &amp; DESIGN</b>	National Association of Schools of Art and Design (NASAD); Reston, VA
<b>BUSINESS</b>	Association to Advance Collegiate Schools of Business (AACSB International); Tampa, FL
<b>CHIROPRACTIC</b>	Commission on Accreditation: Council on Chiropractic Education (CCE-COA); Scottsdale, AZ
<b>CLINICAL LABORATORY SCIENCES</b>	National Accrediting Agency for Clinical Laboratory Sciences (NAACLS); Chicago, IL
<b>CONSTRUCTION</b>	American Council for Construction Education (ACCE); San Antonio, TX
<b>COUNSELING</b>	Council for Accreditation of Counseling and Related Educational Programs (CACREP); Alexandria, VA
<b>DANCE</b>	National Association of Schools of Dance (NASD); Reston, VA
<b>DENTISTRY</b>	Commission on Dental Accreditation: American Dental Association (ADA-CDA); Chicago, IL
<b>ENGINEERING/COMPUTER SCIENCE</b>	Accreditation Board for Engineering & Technology (ABET, Inc.); Baltimore, MD
<b>HEALTH EDUCATION SCHOOLS</b>	Accrediting Bureau of Health Education Schools (ABHES); Falls Church, VA
<b>HEALTH INFORMATION</b>	Commission on Accreditation for Health Informatics and Information Management Education (CAHIIM); Chicago, IL
<b>HEALTHCARE MANAGEMENT</b>	Commission on Accreditation of Healthcare Management Education (CAHME (was ACEHSA)); Arlington, VA
<b>INDUSTRIAL TECHNOLOGY</b>	National Association of Industrial Technology (NAIT); Ann Arbor, MI
<b>LANDSCAPE ARCHITECTURE</b>	Landscape Architectural Accreditation Board: American Society of Landscape Architects (LAAB-ASLA); Washington, DC
<b>LIBRARY &amp; INFORMATION STUDIES</b>	Committee on Accreditation: American Library Association (ALA-CoA); Chicago, IL
<b>MARRIAGE &amp; FAMILY THERAPY</b>	Commission on Accreditation for Marriage and Family Therapy Education: American Association for Marriage and Family Therapy (COAMFTE); Alexandria, VA
<b>MEDICAL EDUCATION</b>	Liaison Committee on Medical Education (LCME); Chicago, IL
<b>MUSIC</b>	National Association of Schools of Music (NASM); Reston, VA
<b>NATUROPATHIC MEDICINE</b>	Council on Naturopathic Medical Education (CNME); Johnson, VT
<b>NUCLEAR MEDICINE TECHNOLOGY</b>	Joint Review Committee on Educational Programs in Nuclear Medicine Technology (JRCNMT); Polston, MT
<b>NURSE ANESTHESIA</b>	Council on Accreditation of Nurse Anesthesia Educational Programs (COA-NA); Park Ridge, IL
<b>NURSING</b>	Commission on Collegiate Nursing Education (CCNE); Washington, DC
<b>NURSING</b>	National League for Nursing Accrediting Commission (NLNAC); New York, NY
<b>OCCUPATIONAL THERAPY</b>	Accreditation Council for Occupational Therapy Education: American Occupational Therapy Association (ACOTE); Bethesda, MD
<b>OPTOMETRY</b>	Accreditation Council on Optometric Education: American Optometric Association (ACOE); St. Louis, MO
<b>OSTEOPATHIC MEDICINE</b>	Commission on Osteopathic College Accreditation: American Osteopathic Association (AOA-COCA); Chicago, IL
<b>PHARMACY</b>	Accreditation Council for Pharmacy Education (ACPE); Chicago, IL
<b>PHYSICAL THERAPY</b>	Commission on Accreditation in Physical Therapy Education: American Physical Therapy Association (CAPTE); Alexandria, VA

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<b>PHYSICIAN ASSISTANT</b>	Accreditation Review Commission on Education for the Physician Assistant (ARC-PA); Duluth, GA
<b>PLANNING</b>	Planning Accreditation Board (PAB); Chicago, IL
<b>PODIATRIC MEDICINE</b>	Council on Podiatric Medical Education: American Podiatric Medical Association (CPME); Bethesda, MD
<b>PROJECT MANAGEMENT</b>	Global Accreditation Center for Project Management (GACPM); Newtown Square, PA
<b>PSYCHOANALYSIS</b>	American Board for Accreditation in Psychoanalysis, Inc. (ABAP); Rockford, IL
<b>PSYCHOANALYSIS</b>	American Psychoanalytic Assn (APsAA); New York, NY
<b>PSYCHOLOGY</b>	Committee on Accreditation: American Psychological Association (APA-CoA); Washington, DC
<b>PUBLIC AFFAIRS &amp; ADMINISTRATION</b>	Commission on Peer Review and Accreditation: National Association of Schools of Public Affairs and Administration (NASPAA-COPRA); Washington, DC
<b>PUBLIC HEALTH</b>	Council on Education for Public Health (CEPH); Washington, DC
<b>RABBINICAL &amp; TALMUDIC EDUCATION</b>	Association of Advanced Rabbinical and Talmudic Schools (AARTS); New York, NY
<b>RADIOLOGIC TECHNOLOGY</b>	Joint Review Committee on Education in Radiologic Technology (JRCERT); Chicago, IL
<b>REHABILITATION EDUCATION</b>	Commission on Standards and Accreditation: Council on Rehabilitation Education (CORE); Rolling Meadows, IL
<b>SOCIAL WORK</b>	Office of Social Work Accreditation and Educational Excellence: Council on Social Work Education (CSWE); Alexandria, VA
<b>SPEECH-LANGUAGE-HEARING</b>	Council on Academic Accreditation in Audiology and Speech-Language Pathology: American Speech-Language-Hearing Association (ASHA-CAA); Rockville, MD
<b>TEACHER EDUCATION</b>	National Council for Accreditation of Teacher Education (NCATE); Washington, DC
<b>TEACHER EDUCATION</b>	Teacher Education Accreditation Council (TEAC); Washington, DC
<b>TEACHER EDUCATION - MONTESSORI</b>	MACTE Commission: Montessori Accreditation Council for Teacher Education (MACTE-CoA); Racine, WI
<b>THEATRE</b>	National Association of Schools of Theatre (NAST); Reston, VA
<b>VETERINARY MEDICINE</b>	Council on Education & Committee on Veterinary Technician Education and Activities: American Veterinary Medical Association (AVMA-COE & CVTEA); Schaumburg, IL

## **ASPA-Member CODE OF GOOD PRACTICE** (Adopted March 21, 1995)

**An accrediting organization holding membership in the Association of Specialized and Professional Accreditors (ASPA):**

- 1. Pursues its mission, goals, and objectives, and conducts its operations in a trustworthy manner.**
  - Focuses primarily on educational quality, not narrow interests, or political action, or educational fashions.
  - Demonstrates respect for the complex interrelationships involved in the pursuit of excellence by individual institutions or programs.
  - Exhibits a system of checks and balances in its standards development and accreditation procedures.
  - Maintains functional and operational autonomy.
  - Avoids relationships and practices that would provoke questions about its overall objectivity and integrity.
  - Analyzes criticism carefully and responds appropriately by explaining its policies and actions and/or making changes.
  
- 2. Maximizes service, productivity, and effectiveness in the accreditation relationship.**
  - Recognizes that teaching and learning, not accredited status, are the primary purposes of institutions and programs.
  - Respects the expertise and aspirations for high achievement already present and functioning in institutions and programs.
  - Uses its understanding of the teaching and learning focus and the presence of local expertise and aspirations as a basis for serving effectively at individual institutions and programs.
  - Keeps the accreditation process as efficient and cost-effective as possible by minimizing the use of visits and reports, and by eliminating, wherever possible, duplication of effort between accreditation and other review processes.
  - Works cooperatively with other accrediting bodies to avoid conflicting standards, and to minimize duplication of effort in the preparation of accreditation materials and the conduct of on-site visits.
  - Provides the institution or programs with a thoughtful diagnostic analysis that assists the institution or program in finding its own approaches and solutions, and that makes a clear distinction between what is required for accreditation and what is recommended for improvement of the institution or program.
  
- 3. Respects and protects institutional autonomy.**
  - Works with issues of institutional autonomy in light of the commitment to mutual accountability implied by participation in accreditation, while at the same time, respecting the diversity of effective institutional and programmatic approaches to common goals, issues, challenges, and opportunities.
  - Applies its standards and procedures with profound respect for the rights and responsibilities of institutions and programs to identify, designate, and control (a) their respective missions, goals, and objectives; (b) educational and philosophical principles and methodologies used to pursue functions implicit in their various missions, goals, and objectives; (c) specific choices and approaches to content; (d) agendas and areas of study pursued through scholarship, research, and policy developments; (e) specific personnel choices, staffing configurations, administrative structures, and other operational decisions; and (f) content, methodologies, and timing of tests, evaluations, and assessments.
  - With respect to professional schools and programs, recognizes the ultimate authority of each academic community for its own educational policies while maintaining fundamental standards and fostering consideration of evolving needs and conditions in the profession and the communities it serves.

- 4. Maintains a broad perspective as the basis for wise decision making.**
  - Gathers and analyzes information and ideas from multiple sources and viewpoints concerning issues important to institutions, programs, professions, publics, governments, and others concerned with the content, scope, and effectiveness of its work.
  - Uses the results of these analyses in formulating policies and procedures that promote substantive, effective teaching and learning, that protect the autonomy of institutions and programs, and that encourage trust and cooperation within and among various components of the larger higher education community.
  
- 5. Focuses accreditation reviews on the development of knowledge and competence.**
  - Concentrates on results in light of specific institutional and programmatic missions, goals, objectives, and contexts.
  - Deals comprehensively with relationships and interdependencies among purposes, aspirations, curricula, operations, resources, and results.
  - Considers techniques, methods, and resources primarily in light of results achieved and functions fulfilled rather than the reverse.
  - Has standards and review procedures that provide room for experimentation, encourage responsible innovation, and promote thoughtful evolution.
  
- 6. Exhibits integrity and professionalism in the conduct of its operations.**
  - Creates and documents its scope of authority, policies, and procedures to ensure governance and decision making under a framework of “laws not persons.”
  - Exercises professional judgment in the context of its published standards and procedures.
  - Demonstrates continuing care with policies, procedures, and operations regarding due process, conflict of interest, confidentiality, and consistent application of standards.
  - Presents its materials and conducts its business with accuracy, skill, and sophistication sufficient to produce credibility for its role as an evaluator of educational quality.
  - Is quick to admit errors in any part of the evaluation process, and equally quick to rectify such errors.
  - Maintains sufficient financial, personnel, and other resources to carry out its operations effectively.
  - Provides accurate, clear, and timely information to the higher education community, to the professions, and to the public concerning standards and procedures for accreditation, and the status of accredited institutions and programs.
  - Corrects inaccurate information about itself or its actions.
  
- 7. Has mechanisms to ensure that expertise and experience in the application of its standards, procedures, and values are present in members of its visiting teams, commissions, and staff.**
  - Maintains a thorough and effective orientation, training, and professional development program for all accreditation personnel.
  - Works with institutions and programs to ensure that site teams represent a collection of expertise and experience appropriate for each specific review.
  - Conducts evaluations of personnel that involve responses from institutions and programs that have experienced the accreditation process.
  - Conducts evaluations of criteria and procedures that include responses from reviewers and those reviewed.