

U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

Recommendation Page

1. **Agency:** Association for Clinical Pastoral Education, Inc. (1969 / 2017)
(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:** Request for an Expansion of Scope of Recognition
3. **Current Scope of Recognition:** The provisional accreditation and accreditation of both clinical pastoral education (CPE) centers and Certified Educator CPE programs within the United States, including those that offer those programs via distance education.
4. **Requested Scope of Recognition:** The provisional accreditation and accreditation of both clinical pastoral education (CPE) centers and Certified Educator CPE programs within the United States, including those that offer those programs via distance education
5. **Date of Advisory Committee Meeting:** 07/31/2019
6. **Staff Recommendation:** Approve the agency's expansion of scope request for preaccreditation and distance education, with distance education subject to full review at the time of the agency's next renewal of recognition.
7. **Issues or Problems:** None

Executive Summary

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Accreditation Commission (Commission) is the accrediting body within the Association for Clinical Pastoral Education, Inc. (ACPE). ACPE is a multicultural, multi-faith organization devoted to providing education and improving the quality of ministry and pastoral care offered by spiritual caregivers in clinical settings where ministry is practiced. The ACPE includes the accredited CPE centers, the certified faculty members (called CPE Supervisors), theological schools, chaplains and others who partner with ACPE in seeking to provide excellence in theological education. The accrediting activities include the preaccreditation and accreditation of clinical pastoral education (CPE) centers (Levels I and II) and supervisory CPE programs.

The Commission accredits 267 centers, 5 candidate centers, 23 accredited systems with 78 components, and 30 satellites sponsored by accredited centers or systems across the nation, and 70 unlisted programs referred to collectively as "CPE centers." The ACPE Accreditation Commission has a voluntary membership, and its principal purpose is accrediting higher education programs, or higher education programs and institutions of higher education. Accreditation does not enable the CPE centers or programs to establish eligibility to participate in the Title IV, HEA programs. However, recognition by the Secretary enables the agency's accredited centers and programs and/or students of these programs to participate in non-HEA programs such as the International Exchange Visitors Program administered by the Department of State and the Veterans Educational Benefits (GI Bill) program administered by the Department of Veterans Affairs. As such, ACPE is not required to meet the separate and independent requirements.

Recognition History

The U. S. Office of Education first recognized the Accreditation Commission of the Association for Clinical Pastoral Education, Inc. in 1969. The Secretary of Education has continued to recognize the agency since then; last granting a five-year recognition to the agency in 2007. The Secretary requested the agency to submit an interim report addressing four compliance issues involving the its standard on record of student complaints, its review of complaints made against a center or itself, and notifications.

After the Secretary issued her decision on the agency's recognition, the Higher Education Opportunity Act of 2008 (HEOA) was passed, which contained a number of provisions related to accrediting agency recognition that were effective upon enactment. The changes included, among others, a reconstitution of the NACIQI. The agency's interim report was accepted by the reconstituted NACIQI at its June 2008 meeting.

The last full review of the agency was conducted at the June 2012 National Advisory Committee on Institutional Quality and Integrity (NACIQI or the Committee) meeting. Department staff and the Committee both recommended, and the Secretary concurred, that

the agency's recognition be continued and that it submit a compliance report addressing the issues identified in the staff analysis. The agency completed a compliance report in 2013.

The 2017 review of the agency determined ACPE should be re-recognized as an agency by the Department of Education. This 2019 review is for expansion of scope to include pre-accreditation and distance education. Department staff observed a site visit for pre-accreditation.

PART II: SUMMARY OF FINDINGS

602.12 Accrediting Experience

(NOTE: Only recognized agencies seeking an expansion of scope need to respond.)

The agency has explained that it uses its pre-accreditation process (referred to as provisional accreditation) already, just outside of its scope of recognition from the US Department of Education. The agency's intention is to formalize the process so that it is included in its scope of recognition. The documentation in other sections of this petition demonstrate that the agency has granted this status previously.

602.15 Administrative and fiscal responsibilities

The agency meets this requirement if the agency demonstrates that--

(a) The agency has--

(1) Adequate administrative staff and financial resources to carry out its accrediting responsibilities;

ACPE maintains 2 employees that are responsible for providing administrative support for the agency's accreditation activities. The agency has provided a copy of the ACPE organizational chart (exhibit 3). The agency has also provided resumes (exhibits 1 and 2) demonstrating the experience and qualifications for each of the staff and the positions they serve in. While this is the same number of staff that was reported during the agency's full renewal petition for recognition to the Department, the agency has explained that it already has been using a pre-accreditation process (referred to as provisional accreditation) already, just outside of its scope of recognition from the US Department of Education. The agency's intention is to formalize the process so that it is included in its scope of recognition.

ACPE's budgets for 2018 and 2019 have been provided (exhibits 6 and 7). The agency has also provided a copy of its audited financials for 2017 (exhibit 5). The agency's budget encompasses the provisional accreditation process. In addition, Department staff has received no complaints against the agency regarding its inability to perform accreditation activities .

(2) Competent and knowledgeable individuals, qualified by education and experience in their own right and trained by the agency on their responsibilities, as appropriate for their roles, regarding the agency's standards, policies, and procedures, to conduct its on-site evaluations, apply or establish its policies, and make its accrediting and preaccrediting decisions, including, if applicable to the agency's scope, their responsibilities regarding distance education and correspondence education;

The agency outlines its membership requirements regarding Commission member's in the Qualifications for Commission Membership publication (Exhibit 11). Commissioners: The commission is comprised of currently 14 members, with one spot vacant. The agency adheres to the requirements for including public members and educator/practitioners. The vacant spot is for a public member, however ACPE is recognized as a programmatic accreditor and is not required to meet the 1:7 rule for public members.

The list of Accreditation Commission members identifies the specific role (educator, practitioner or public member), that each commissioner is serving in and exhibit 12 gives examples of sample resume's demonstrating that the Commissioners are qualified for the roles in which they serve. The agency has also provided summary documentation of the training of these individuals in exhibit 16.

(4) Educators and practitioners on its evaluation, policy, and decision-making bodies, if the agency accredits programs or single-purpose institutions that prepare students for a specific profession;

The agency outlines its membership requirements regarding Commission member's in the Qualifications for Commission Membership publication (Exhibit 11). Commissioners: The commission is comprised of currently 14 members, with one spot vacant. The agency adheres to the requirements for including public members and educator/practitioners.

The list of Accreditation Commission members identifies the specific role (educator, practitioner or public member), that each commissioner is serving in and resumes were included in the prior section (exhibit 12-sample resumes). In 34 CFR 602.15 the agency provided documentation of the training of these individuals.

602.16 Accreditation and preaccreditation standards

The agency meets this requirement if -

(1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:

(i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.

The agency's standards have established a threshold requirement for completion. The agency's policy requires that over ten years 75% of students who were oriented to a clinical pastoral education program(s) have received credit. This information is reported annually from the program through the annual report. The agency has explained that the benchmark is effective and is reassessed every 5 years.

Department staff is not clear on how this standard will be applied to those in pre-accreditation status. There is no discussion of student achievement in the feasibility studies provided by the agency as demonstration of application, which is logical as there are no students or that students have not completed the program. During the site visit Department staff observed that the program was just being established and that there were not students, so a measurement of student achievement was not possible. However, the agency must explain the pathway that the center would follow to progress from a place where there are no students to measure student achievement to a pathway where the center must meet the agency's benchmarks.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency has clarified the expectation for student achievement for those in pre-accreditation status. The agency has indicated that this threshold will be monitored through the use of the agency's annual reporting mechanism. The inclusion of this information resolves the concerns raised in the draft staff analysis.

The agency's establishes curricula standards in the ACPE Standards 2016. The agency requires that curriculum includes the following: a specified time period for training, clinical practice requirements, supervision, the learning contract, the learning environment, the instructional plan, literature, evaluations, and threshold completion levels for CPE Level I/Level II and Certified Educator CPE. The agency provides a guide for the centers to assess their own curriculum, as well as has provided multiple examples of documentation that shows how its site teams review the curriculum at the on-site locations.

Department Staff had an opportunity to observe how a comprehensive evaluation of curriculum was conducted by the site team during the site team visit.

The agency establishes in the ACPE standards that centers will have faculty standards relative to number, education, competence, and experience. These standards are also explained for adjunct faculty or guest lecturers, and individual and group supervision by persons approved by ACPE. Multiple examples of documentation (exhibits 18, 39, 40, & 41) in the site team reports verifies a review and evaluation of an institution for compliance with the requirements of its faculty standards.

The agency establishes in the ACPE standards that centers will have standards related to facilities, equipment, and supplies that ensure safety and adequacy for its students. For example, ACPE requires that that all centers have sufficient financial, human and physical resources, as well as library and educational facilities. The agency included multiple examples of a site visit reports that show areas related to this criterion are reviewed.

The agency establishes in the ACPE standards that centers will have standards related to fiscal and administrative capacity. The agency provided as documentation multiple examples of site visit reports, and the ten year report that requires a review and assessment of the centers capacity both from a fiscal and administrative perspective.

The agency requires centers to establish an adequate financial base. To evidence compliance with its standards the agency

requires that centers provide a copy of budgets for the current and preceding four-year period and the certified auditor's report letter for the last two years during the site visit. In addition to the financial specifics, the agency requires an organizational chart, a letter of administrative support, and a plan for faculty. The center must also demonstrate its plans for managing correspondence and record keeping.

The agency establishes in the ACPE standards that the center will have standards related to student support services that are adequate and appropriate. For the preaccreditation process, the agency requires that the center submit the student handbook that must include information for the students relative to orientation, educational guidance, counseling services, resume preparation and employment searches. The multiple examples of documentation (exhibit 44 and 45) provided verifies the agency's review and evaluation of an institution for compliance with its student services standard.

The agency establishes in the ACPE standards centers will have standards related to recruiting and other practices that are adequate and appropriate. Specifically, the standards require the centers to address the recruiting and admissions practices, academic calendars, catalogs, publications, grading and advertising for CPE programs. The agency provided multiple examples (exhibits 18, 39, 40 & 41) of site visit reports to demonstrate the agency's review and evaluation of an institution for compliance under this section.

The agency's requirements for handling complaints from applicants, candidates, and accredited programs and centers is found in the following manuals: Processing Complaints of Ethics Code Violations (Exhibit 47), Policy for Complaints Alleging Violations of Educational Standards in Educational Programs (Exhibit 48), and Policy for Complaints Against the Accreditation Commission (Exhibit 49).

The agency policies are specific and require that programs distribute information about complaints on a regular interval and explains who has the responsibility for maintaining the record. The agency has also explained that they review this information as it is presented to the Commission as well as the requirement that it must be reported in the annual report from the program. Information from the complaints is reported on by the program in their Five Year report (Exhibit 50) and Ten Year self-study (Exhibit 43).

The agency has standards for the handling of complaints, however, the agency has not included any copies of any complaints or attested that they have not had any complaints.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency has clarified it has not received any complaints. The inclusion of this information resolves the concerns raised in the draft staff analysis.

Previously the Secretary of Education did not recognize ACPE for preaccreditation status and the agency had not requested to be recognized for preaccreditation. However, the agency has now requested that its provisional approval be used to determine the feasibility of a program gaining initial accreditation.

The agency provided documentation relative to this status in their Accreditation Manual. Provisional approval according to the agency's definition of terms refers to the approval required prior to the start of any pre-accredited center or satellite program, the addition of a component site, or addition of Certified Educator CPE. The Commission is the decision making body that makes the final decision.

Policy 2 (Exhibit 53) clearly states that the program or center may not remain in pre-accredited status beyond five years, as required by this criterion. However, this document has not been updated to remove the disclaimer language about pre-accreditation not being recognized by the Department. The agency must amend this document so that it clear that this status (if the expansion of scope is granted) is included in the agency's scope of recognition.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency has made the updates needed to Policy 2, which removed the disclaimer language about preaccreditation not being within the agency's scope of recognition. The inclusion of the revised language resolves the concerns raised in the draft staff analysis.

(c) If the agency has or seeks to include within its scope of recognition the evaluation of the quality of institutions or programs offering distance education or correspondence education, the agency's standards must effectively address the quality of an institution's distance education or correspondence education in the areas identified in paragraph (a) (1) of this section. The agency is not required to have separate standards, procedures, or policies for the evaluation of distance education or correspondence education;

Per regulation in 34 CFR 602.27, notification that the agency has expanded its scope of recognition to include distance education was received January 15, 2019. Such an expansion of scope is effective on the date that the Department receives the notification. When ACPE's full petition for renewal is reviewed in 2022, the agency's standards for distance education will be reviewed and the

agency must demonstrate the application of its standards at that time.

602.18 Ensuring consistency in decision-making

The agency must consistently apply and enforce standards that respect the stated mission of the institution, including religious mission, and that ensure that the education or training offered by an institution or program, including any offered through distance education or correspondence education, is of sufficient quality to achieve its stated objective for the duration of any accreditation or preaccreditation period granted by the agency. The agency meets this requirement if the agency--

(a) Has written specification of the requirements for accreditation and preaccreditation that include clear standards for an institution or program to be accredited;

The agency's standards are clearly written and the agency has several documents that guide centers through the pre-accreditation and accreditation processes with clear specifications and requirements. All of the agency's publications are available at the agency's website so that centers can access information related to the respective accreditation process that the center is pursuing.

(b) Has effective controls against the inconsistent application of the agency's standards;

The agency addresses concerns with inconsistent application of its 300 standards (exhibit 53) by having clearly written standards and policies that are published in agency manuals and by training individuals involved in the accreditation process. The agency utilizes national site team chairs to guide the agency's site visit process. The chairs have a manual (exhibit 13) that has been established to provide a level of consistency across reviews. The agency's documents include checklists and templates to assist in the review of self-studies and during the visit.

Training for the agency's decision-making body as well as others involved in accreditation activities has been well documented in criterion 602.15.

(c) Bases decisions regarding accreditation and preaccreditation on the agency's published standards;

The agency requires that its centers must address all standards via the self-study or other mechanisms, and demonstrate continued compliance by means of annual reports and periodic reports. The Accreditation Commission makes all final decisions concerning the accreditation of centers and programs based on the agency's standards.

(d) Has a reasonable basis for determining that the information the agency relies on for making accrediting decisions is accurate; and

The agency has a reasonable basis for determining that the information the agency relies on for making accrediting decisions is accurate. The agency's accreditation process requires the submission of a self-study that is verified by an on-site evaluation team. The on-site review team verifies the information provided by reviewing documents, and through interviews with staff, faculty and students (if applicable, for pre-accreditation students may not be enrolled and present at the time of visit). The Center then has the opportunity to review and respond to the team evaluation report. The final report is presented to the Commission for its final review and decision.

The agency issues two site visit reports. Site visit report part one provides accredited programs and centers with initial notification of their compliance or non-compliance with ACEPI standards. Site visit report two is generated based on the center's or program's response to the areas identified non-compliant in the first site visit report. The Accreditation Commission informs accredited centers and programs with a Commission action letter that contains The Accreditation Commission's final decision on the accreditation status of the center or program that identifies the specific deficiencies.

The agency has attached multiple examples of site visit reports and related Commission action letters that evidence the agency's clear identification of deficiencies.

PART III: THIRD PARTY COMMENTS

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