

## U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

### Recommendation Page

1. **Agency:** Council on Chiropractic Education, The ( 1974 / 2011)  
(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 of programs leading to the Doctor of Chiropractic degree and single-purpose institutions offering the Doctor of Chiropractic program.
4. **Requested Scope of Recognition:** Same as above.
5. **Date of Advisory Committee Meeting:** 02/22/2017
6. **Staff Recommendation:** Continue the agency's current recognition and require the agency to come into compliance within 12 months, and submit a compliance report 30 days after the 12 month period that demonstrates the agency's compliance with the issue identified below.
7. **Issues or Problems:** It does not appear that the agency meets the following section of the Secretary's Criteria for Recognition. The issue is summarized below and discussed in detail under the Summary of Findings section.

-- The agency is requested to revise its policies related to its 12-month confidential warning to ensure that such a warning is for a much shorter period of time, is made public, and is included in the 12-18-24 month time limits specified in this section. [§602.20(a)]

### Executive Summary

#### PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Council on Chiropractic Education is recognized as a specialized accreditor. It currently accredits 15 doctor of chiropractic programs at 18 sites in 13 states. Of these programs, CCE accredits one program that is offered through a single-purpose chiropractic institution. The agency's one single-purpose chiropractic institution uses the agency's accreditation to establish eligibility to participate in the Title IV HEA programs. Accreditation by the agency also allows its 15 programs to participate in non-Title IV programs offered through the Department of Health and Human Services (HHS).

#### Recognition History

CCE was first recognized by the Commissioner of Education in 1974 and has received periodic renewal of recognition since that time. The agency was last reviewed for continued recognition at the Fall 2011 NACIQI meeting. At that time, it received continued recognition and was requested to submit a compliance report on several areas of the Criteria. The agency's compliance report was reviewed at the Fall 2013 NACIQI meeting, and the agency's recognition was continued for a period of three years. The agency's next regularly-scheduled petition for continued recognition is the subject of the current staff analysis. No complaints about the agency were received this review period.

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#### PART II: SUMMARY OF FINDINGS

##### 602.20 Enforcement of standards

##### **ears in length.**

The requirements of this section are addressed in the agency's accreditation standards (Ex. 98). A section on accreditation decisions and actions addresses the enforcement of standards. It references ED's requirements and states that the agency will immediately initiate adverse action if the council's review of a program or institution indicates non-compliance with a standard. The two-year time limit applies to all of the agency's programs/institutions, as noted in the agency's standards. The standards note that if a program/institution does not bring itself into compliance within the initial two-year time limit, the council must take immediate adverse action unless the time period is extended for good cause. The standards then further explain the definition and conditions for good cause.

As documentation, the agency provided a sample copy of the tracking report that the council receives noting areas of non-compliance for programs/institutions (Ex. 110) and sample action letters referencing the two-year enforcement timeframe and the resolution of areas of non-compliance within the required limits (Ex. 99).

Staff accepts the agency's narrative and supporting documentation, and no additional information is requested.

**Analyst Remarks to Response:**

Although not noted as an issue in the draft staff analysis, during its observation of an agency Commission meeting in January 2017, ED staff became aware of an issue related to the requirements of this section. The agency's policy manual makes provision for a "confidential warning" to doctoral programs that need to address agency concerns regarding accreditation. The warning may be issued if the agency determines that the deficiencies may be corrected by the program in a "short period of time." The warning is a non-public procedural action that may be continued for a period of up to twelve months. ED staff does not feel that twelve months constitutes a "short period of time" and also has concerns that the action is not publicly noted, which presents the possibility that the warning period might not be counted against the 12-18-24 month time limits specified under this section. The agency is requested to revise its policies related to its 12-month confidential warning to ensure that such a warning is for a much shorter period of time, is made public, and is included in the 12-18-24 month time limits specified in this section.

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**PART III: THIRD PARTY COMMENTS**

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