



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

May 9, 2018

Sandra Wise, Senior Director
Department of Accreditation
Commission on Accreditation in Physical Therapy Education
American Physical Therapy Association
Trans Potomac Plaza
1111 North Fairfax Street
Alexandria, VA 22314

Dear Dr. Wise:

I am writing to inform you of my decision on the renewal of recognition of the American Physical Therapy Association, Commission on Accreditation in Physical Therapy Education. U.S. Department of Education (Department) staff and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) have each made recommendations to me. These recommendations were made under Sections 114 and 496 of the Higher Education Act of 1965, as amended, and pursuant to relevant statutory and regulatory provisions.

Both the Department staff and the NACIQI recommended that I continue CAPTE's recognition as a nationally recognized accrediting agency at this time, require the agency to come into compliance within 12 months from the date of this letter, and to submit a compliance report due 30 days thereafter that demonstrates CAPTE's compliance with the Secretary's Criteria for Recognition.

Staff found, and the NACIQI agreed, that CAPTE failed to meet the requirements related to administrative extensions in 34 C.F.R. § 602.20(a) and its extension for good cause policy in 34 C.F.R. § 602.20(b). Specifically, related to § 602.20(a), staff stated that CAPTE must provide documentation to demonstrate it has taken an adverse action and enforced the timeframes required by the section. For § 602.20(b), staff concluded that CAPTE must provide documentation to demonstrate that it clearly communicates to a program when it grants an extension for good cause.

I have reviewed the record thoroughly, noting both the Department staff's rationale for its compliance findings and the deliberations by the NACIQI members at the meeting that led to the committee's recommendation.

First, it appears that CAPTE's policies regarding administrative extension did not meet the Secretary's recognition criteria at the time it submitted its petition for recognition. However, CAPTE made changes to its policies in response to the draft staff report that put itself into compliance so far as having an appropriate written policy in place. Staff noted, however, that CAPTE had not demonstrated

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it had the opportunity to apply its updated policy to a program or institution and therefore did not meet the recognition criteria.

CAPTE should not be faulted for having not had the opportunity to apply its updated policies. Moreover, the materials provided by CAPTE to demonstrate application of both 34 C.F.R. §§ 602.20(a) and (b) do evidence that it has applied administrative extensions to institutions in a manner consistent with the requirements of paragraph (a).


CAPTE's materials similarly demonstrate compliance with the good cause requirements of 34 C.F.R. § 602.20(b). The "Summary of Action" examples included in CAPTE's exhibits related to probationary accreditation explain why CAPTE was continuing the probationary period and included specific findings about the agency's concerns regarding the performance of specific programs at issue. The Summary of Action documents also explained the basis for CAPTE's decision and that CAPTE appropriately document compliance in a Compliance Report which would be used by CAPTE both to determine and monitor compliance with the agency's criteria. CAPTE also provided specific notices in its Summary of Action documents which outlined in detail its policies, including its comprehensive definition for "good faith effort" which appears functionally equivalent to the good cause standard of 34 C.F.R. § 602.20(a).

I acknowledge the concerns of Department staff, but as a result of these conclusions, I am fully renewing CAPTE's recognition at this time for a period of five years. Although CAPTE met the minimum standards required by 34 C.F.R. § 602.20 for enforcement actions, I would encourage it to make clear that its "good faith effort" criteria policy is intended to mean the same thing as the Department's "good cause" standard of 34 C.F.R. § 602.20(b) and that it clearly communicates the policy to institutions when applied.

Scope of recognition: The accreditation and preaccreditation ("Candidate for Accreditation") in the United States of physical therapist education programs leading to the first professional degree at the master's or doctoral level and physical therapist assistant education programs at the associate degree level and for its accreditation of such programs offered via distance education.

Please convey my best wishes to the members of CAPTE. We do appreciate the work that CAPTE does to improve the quality and success of postsecondary education in the United States.

Sincerely,



Diane Auer Jones
Senior Policy Advisor
Office of Postsecondary Education