

<b>Name:</b> Accreditation Council for Pharmacy Education	<b>Meeting Date:</b> 06/20/2017	<b>Response Submit Date:</b> 05/03/2017	<b>Status:</b> Final Review	<b>Type:</b> Renewal Petition
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**U.S. Department of Education**

Staff Report

to the

Senior Department Official

on

Recognition Compliance Issues

**Recommendation Page**

1. **Agency:** Accreditation Council for Pharmacy Education
2. **Action Item:** Renewal Petition
3. **Current Scope of Recognition:** The accreditation and preaccreditation, within the United States, of professional degree programs in pharmacy leading to the degree of Doctor of Pharmacy, including those programs offered via distance education.
4. **Requested Scope of Recognition:** Same.
5. **Date of Advisory Committee Meeting:** June 20, 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 sections of the Secretary's Criteria for Recognition. These issues are summarized below and discussed in detail under the Summary of Findings section. -- ACPE does not meet the requirements of this section ACPE needs to revise its policy to stipulate that board members who participate in the evaluation process (as an active evaluator) must be recused during the decision-making process. [§602.15(a)(4)]

**Executive Summary**

**Part I: General Information About The Agency**

The Accreditation Council for Pharmacy Education (ACPE) accredits and preaccredits professional degree programs in pharmacy leading to the Doctor of Pharmacy degree. Currently, the agency accredits approximately 114 programs, and preaccredits 16 programs, throughout the United States, Puerto Rico and the District of Columbia. Those programs are within institutions that are accredited by regional and national accrediting agencies recognized by the Secretary of Education. Since ACPE is not an institutional accreditor, and does not serve as a gatekeeper of Title IV funds, the agency is not required to meet the Secretary's separate and independent requirements.

**Recognition History**

The agency was on the first list of nationally recognized accrediting agencies published in 1952. Since that time, the Secretary has periodically reviewed the agency and granted continued recognition. Originally known as the American Council on Pharmaceutical Education, the agency was renamed the Accreditation Council on Pharmacy Education (ACPE) in 2003.

The last full review of ACPE took place at the June 2012 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). After that review, the Department extended the agency's previous grant of recognition and required a compliance report on the issues cited in the staff analysis. As part of its evaluation of the agency's current petition for continued recognition, Department staff reviewed the agency's narrative and supporting documentation. Furthermore, no third-party comments were received in connection with the agency's petition.

The agency petition for continued recognition by the Secretary is the subject of this analysis and report.

## **Part II: Summary Of Findings**

### **602.15(a)(2) Competency of Representatives**

**(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;**

Board of Directors: The board of directors is both the policy-and decision-making body of the agency. The 10-member board is appointed by three pharmacy organizations representing pharmacy educators, practitioners, and regulators, and by the American Council on Pharmacy Education. The agency's board appointment criteria (found in the agency's bylaws) specifically define the qualifications for board members, thus ensuring that it includes educators, practitioners, and public members . While the agency provided briefs/short bio's of the qualifications for each of its Board member, the briefs do not provided enough information. The agency needs to provide resumes or CV's for each of its board members in order to verify their qualifications and to demonstrate which roll each board member is serving in (educator, practitioner or public republic representative).

The agency demonstrated that it provides training to board members regarding their role and responsibilities, as well as the standards, policies, and procedures of the agency. As indicated in the narrative and documentation, this training is accomplished through an orientation program, audit attendance at two board meetings, and attendance at a site visitor training workshop, optional observation of on-site evaluation, and on-going training. The workshops are intensive, interactive, and include a detailed review of the standards, including those related to distance education.

Appeals panel members: The agency provided its appeals policies and procedures, to include the qualifications and selection process for appeals panel members which include; (EXHIBIT 25, Appeals Policy). The Appeals body must include an administrator (such as a dean of an accredited program), pharmacy educators, pharmacy practitioners, and a public member (such as a former member of the ACPE Public Interest Panel or a former American Council on Education appointee to the ACPE Board), all of who have been trained in the ACPE standards, policies and procedures including those related to distance education. The database of trained evaluators serves as the list from which Appellate Commission members may be selected and only trained evaluators are eligible to serve on an Appellate Commission. The agency notes that to date, ACPE has never had an appeal of an accreditation decision and has not had occasion to convene an Appellate Commission.

Site visitors: The agency states that an on-site evaluation team includes educators and practitioners. The agency provided its evaluation team policies (EXHIBIT 19, Evaluation Team Policy) which outline the specific qualifications of evaluation team members. The agency demonstrated that it provides comprehensive and ongoing training to site visitors regarding their role and responsibilities, as well as the standards, policies, and procedures of the agency, including those related to distance education. This training is accomplished through attendance at a site visitor training workshop and on-going participation in web-based workshops. First-time site visitors receive further training and mentoring to fulfill their role

#### **Analyst Remarks to Response:**

In response to the draft analysis, the agency confirmed its board appointment criteria (found in the agency's bylaws) which specifically define the qualifications for board members, thus ensuring that it includes educators, practitioners, and public members . The agency also provided CV's for each of its Board members (Exhibit A) verifying their qualifications. ACPE also provided documentation (Exhibit B) demonstrating which roll (educator, practitioner or public republic representative) each of the Board members is serving in.

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### **602.15(a)(4) Educator/Practitioner Representatives**

**(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 provided its board appointment criteria, qualifications, and current board roster, which clearly indicates that there are both educators and practitioners included. The agency provided the policy relating to the appeals panel composition, which clearly requires both educator and practitioner representation. As the agency stated in Section 602.15(a)(2) that it has not convened an

appeals panel, it therefore could not provide documentation to verify implementation of its policies and procedures. In regards to site visitors, the agency included its on-site evaluation policy, which requires representation by an educator and practitioner. The agency provided sample on-site evaluation teams as documentation, which include both practitioners and educators. However, the agency did not provide resumes or CV's for its Educator/Practitioner/ Representatives members (see Sec 602.15(a)(2)) to verify their qualifications. ACPE also failed to indicate (Exhibit 27) which board member are serving as educators or practitioners and or public members (which is required for Sec 602.15(a)(5)). The Department is also concerned that the agency indicates that a Board member serves as a site team member without providing any evidence of recusals of the Board member during decision meetings

The agency needs to provide resumes or CV's to verify the qualifications of its educator and practitioner representatives. The agency also needs to clarify the position of its board members on site evaluation teams and what if any procedure is put in place for recusals of those members during commission decision meetings.

#### **Analyst Remarks to Response:**

In response to the staff's draft analysis, ACPE provided CV's verifying the qualifications of its educator and practitioner representatives and documentation demonstrating the roles each representative plays in the evaluation process (Exhibit A). The agency also provided additional clarification of its process of including board members on site evaluation teams and the processes it uses for recusals of board members during commission decision meetings. ACPE reaffirms that it has always included Board members as active participant of the on-site evaluation team. ACPE does not recuse the Board member that served on the evaluation team from discussion or vote on the program's accreditation at the Board meetings.

The agency states that its evaluation teams are carefully created to ensure a balance of perspectives, evaluation by representative members and to protect against conflicts of interest. In addition, the agency's evaluation process requires that individual programs review the proposed site teams for potential conflicts of interest and provide verification regarding the absence of any conflicts of interest among the selected evaluation site team members. The agency provided its conflict of interest policy (Exhibit G) and a signed conflict of interest form (Exhibit D2). The agency's process during its Board meeting is to open the meeting with a briefing from legal counsel on the importance of declaring conflicts of interest and solicitation of recusals from discussion should any new conflict or matter that would prevent any Board member from being non-partial and unbiased in the discussion and vote on any program on the meeting agenda arise (EXHIBIT E2, Conflict of Interest Presentation at Board Meeting). Consequently, any Board or staff member with a potential conflict of interest for a particular program is recused from discussion and deliberation at the Board meeting and is absent during the Board's deliberation and vote.

Department staff concludes that, in general, the agency has provided sufficient documentation to demonstrate that it has a rigorous conflict of interest policy. However, regarding board members serving in an active roll on site teams. While it is accepted practice to have board members accompany site-evaluation teams as observers (not as active participants, having a direct role in the evaluation process and making evaluation decisions and recommendation) who may vote at board/commission meetings on the specific program visited. It would not be acceptable for a board member to actively serve as an evaluator and a decision maker. Evaluation bodies (site teams) and decision making body have distinct rolls in the accreditation process. Serving in both roles (evaluator and decision maker) can change the perspective of decision makers it is; however, a commonly accepted practice for those board members, that participate as site team evaluators when they are needed to serve in specific roles on site teams to recuse themselves from the decision making process.

ACPE needs to revise its policy to stipulate that board members who participate in the evaluation process (as an active evaluator) must be recused during the decision-making process.

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#### **602.16(a)(1)(vii) Recruiting & Other Practices**

##### **(a)(1)(vii) Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.**

The agency's standards expect programs to have published admissions policies. The adequacy of the admissions requirements is determined by their availability to the students and prospective students, and that they clearly contain the criteria, policies, and procedures for admission to the professional degree program. As well, the admission materials must clearly state academic expectations, required communication skills, types of personal history disclosures that may be required, and professional standards for graduation. Catalogs are expected to be current; clearly state the mission, objective and policies; and contain the basic elements pertaining to academics. Furthermore, all publications are expected to accurately describe the policies and procedures applicable to the pharmacy program, including its current accreditation status. However, it is not clear to the Department where in the agency's policies they address academic calendars which is a requirement of this section.

While the agency's documentation demonstrate that the agency's visiting team evaluates the self-study and reviews evidence including recruiting materials and advertisements, copies of catalogs and handbooks, class schedules, and student records including grades, the Department could not identify where the agency evaluated the school's academic calendars.

The agency needs to clarify where in its standards it addresses academic calendars, and where in its evaluation process of the

schools published student information they review the school for compliance with this section of the criteria..

**Analyst Remarks to Response:**

In response to the staff's draft analysis, ACPE reports that the evaluation of the schools academic calendar is routinely conducted and included when reviewing Key Element 15.1 of Standards 2016, and requires that the program produce and make available to enrolled and prospective students updated information of importance and lists items, such as governance documents, policies and procedures, handbooks, and catalogs. (EXHIBIT H, Standard 15 - Academic Environment). ACPE has modified the evaluation team report template to ensure that the evaluation team reviews documentation related to academic calendars, and in response to the staff's comments in the draft analysis, ACPE has immediately acted to add "academic calendars" to the Evaluation Team Rubric for Key Element 15.1 (EXHIBIT I, Standard 15 Revised Rubric). In addition, the guidance document will be updated to reflect review of academic calendars as noted under Guidance for the Academic Environment: Standard 15 (EXHIBIT J, Standard 15 Revised Guidance

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**Part III: Third Party Comments**

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