ACCREDITATION PROCEDURES

Schools of Public Health

Public Health Programs Outside Schools of Public Health



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ACCREDITATION PROCEDURES

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Introduction

The Council on Education for Public Health (CEPH) is an independent agency, recognized by the US Department of Education (USDE) to accredit schools of public health and programs in public health that are located in administrative settings other than schools of public health. These two categories of educational programs constitute CEPH's scope of recognition. In keeping with good accreditation practices, CEPH is responsible for notifying the US Secretary of Education of any change that would alter its scope of recognition or compliance with any of the criteria against which it is periodically reviewed for recognition.

The goal of the Council, a mission held in common with the schools and programs it accredits, is "to enhance health in human populations, through organized community effort." Its organizational focus is the improvement of health through the assurance of educational programs that prepare professional personnel to identify, prevent and solve community health problems. The Council seeks to:

- 1. promote quality in education for public health through a continuing process of self-evaluation by the schools and programs that seek accreditation;
- 2. assure the public that institutions offering accredited instruction in public health have been evaluated and judged to meet standards essential to conduct such educational programs; and
- 3. encourage through periodic review, consultation, research, publication and other means improvements in the quality of education for the field of public health.

CEPH is an autonomous organization that establishes its own accreditation policies. These are incorporated in two types of publications: the procedures manual, which establishes a fair and equitable process for accreditation review, and the criteria documents, which identify the standards by which schools and programs are evaluated. The procedures and criteria used by CEPH are adopted by its governing body, the CEPH Board of Councilors, after full review, discussion and comment by public health practitioners, educators, students, alumni and other stakeholders.

The procedures are implemented by councilors, staff and site visit teams after full explanation to individuals involved in the accreditation review activities. Procedural guidance is provided to school and program representatives through consultation with CEPH staff, to team chairs during orientation sessions, and to site visitors in training programs and executive sessions at the beginning of each site visit.

Evaluation of the CEPH accreditation review process is explained in the last section of this manual. Revisions in the procedures and criteria may be made on the basis of comments from school or program representatives and site team members, and upon the recommendations of recognized agencies in the accrediting community. Changing situations in education, in legislation and in the practice of public health may also necessitate revision. The procedures and criteria used by CEPH are evaluated periodically and may be modified after affected parties have been given an opportunity to review and comment upon any proposed change of a substantive nature. A review and revision is scheduled approximately every five years or more frequently as needed.

CEPH Board of Councilors

The Board of Councilors is the 10-member decision-making body of CEPH. As an independent body, the board is solely responsible for adopting criteria by which schools and programs are evaluated, for establishing policies and procedures, for making accreditation decisions and for managing the business of the corporation. Board members are appointed by the agency's two corporate sponsors, the American Public Health Association (APHA), a professional membership organization, and the Association of Schools of Public Health (ASPH), an association of schools. The agency maintains and makes publicly available on its website a list of current board members and principal staff, including their names, academic and professional qualifications and relevant employment and organizational affiliations.

CEPH staff orients new Council members upon their appointment to the board. Each new councilor is provided with CEPH documents and publications describing the agency's history, procedures, guidelines, policies (including conflict of interest policies), criteria and recent activities. Each year, CEPH schedules a formal training session for new councilors in conjunction with regular board meetings. New councilors must also attend site visitor training and observe a site visit if they are not already experienced site visitors.

Uses of this Manual

This publication describes the procedures used by the Council in the accreditation of schools and programs offering education in public health. It is intended for a variety of audiences:

- representatives of schools and programs that participate in the accreditation process or that may seek accreditation in the future and thus desire guidance about the review process and CEPH's expectations.
- members of site visit teams and Council consultants who have responsibilities for implementing the process.
- interested organizations, agencies and individuals who desire information about the accreditation practices of the Council.
- members of the general public who desire information about accreditation in public health and what a school or program must do to achieve that designation.

This manual should be used in conjunction with documents that set forth CEPH's current accreditation criteria for schools of public health and public health programs.

The procedures described in this manual are applicable to both school and program reviews and for all levels of accreditation decisions. The manual is designed to be equally useful to applicants seeking initial accreditation and to already-accredited schools and programs undergoing periodic reevaluation. For a brief overview of the entire accreditation process, see the "Overview of Activities in an Accreditation Review" that follows.

Overview of Activities in an Accreditation Review

The list that follows provides a brief overview of major steps in the accreditation review process. For a detailed description of all steps and requirements, please refer to the sections that follow. If a school or program has not been previously accredited or is making a transition to a 1. new category of accreditation, an application is submitted. If a school or program is currently accredited, approximately two years before the accreditation term concludes, CEPH notifies the school or program that it will be reviewed during an upcoming review cycle. 2. The program or school plans and begins to conduct an analytical self-study. Completion of the self-study typically requires 18-24 months but may be longer or shorter in some cases. The program or school arranges for CEPH consultation, as appropriate or required. An _ 3. on-site CEPH consultation visit is required for all applicant schools and programs. All applicant schools and programs attend CEPH's annual Accreditation Orientation 4. Workshop. Accredited schools and programs may also choose to attend the workshop to assist in their preparation for reaccreditation. The school or program selects tentative site visit dates. 5. CEPH establishes deadlines for submission of the preliminary and final self-study 6. documents and other events leading up to the on-site visit. CEPH provides names and addresses of the councilor(s) and the site visit chair who 7. will read the preliminary self-study document. 8. CEPH bills the school or program for the review fee. 9. The school or program submits the preliminary self-study document and electronic resource file to the CEPH coordinator, designated councilors and the site visit chair approximately five months before the site visit. ___ 10. CEPH notifies the school or program that it must make its constituents aware of the opportunity to provide written third-party comments to the CEPH office. CEPH reviews the preliminary document to determine whether the review should 11. proceed and offers suggestions and comments about improving the documentation. CEPH appoints the site visit team, notifies the school or program about team ____12. composition, inquires about conflicts of interest and provides mailing addresses to the school or program. 13. CEPH sends each team member background materials and other information needed in preparation of the site visit. If appropriate, CEPH also provides a copy of any thirdparty comments. The school or program makes hotel reservations and ensures that individual 14. confirmations are sent to team members.

15.	The school or program develops a tentative site visit agenda and consults with CEPH staff about its acceptability eight weeks prior to the site visit.
16.	The school or program sends the final self-study document, electronic resource file, site visit agenda and site visit logistics form to each team member, including the visit coordinator, one month prior to the visit.
17.	CEPH advises university officials about the upcoming campus visit.
18.	CEPH team conducts the visit and determines the validity of the self-study document. The site visit chair reports major findings to school or program officials during the exit interview.
19.	CEPH sends follow-up letters to team and university officials. Team members receive an evaluation questionnaire.
20.	CEPH reimburses team members for travel and living expenses and submits an invoice for all travel to the school or program.
21.	The school or program submits payment for accreditation fee and reimbursement of expenses.
22.	CEPH staff prepares first draft of site team report and distributes to team members only for revisions and corrections.
23.	CEPH staff submits second draft to school or program for correction of factual errors; dean or director is invited to prepare written response.
24.	CEPH staff incorporates factual corrections in final draft and forwards, with written response, to each councilor. The report is sent to the chief executive officer for comment.
25.	CEPH considers the team report at its spring or fall board meeting. Council adopts the team's report, as is or as amended, and makes a decision about accreditation.
26.	CEPH notifies university official and dean or director of decision, transmitting final reports within 30 days of decision.
27.	CEPH notifies USDE of final action within 30 days of decision or immediately in the case of an adverse action.
28.	CEPH sends other relevant notifications to the appropriate state agencies and recognized accrediting bodies.
29.	CEPH invites the dean or director to evaluate the CEPH processes.
30.	CEPH makes accreditation report available to the public within 60 days of communicating the final action to the school or program. A written response by the school or program will be attached, if provided within 50 days.

Initiating the Review Process

New Applicants

A school or program that is not accredited by CEPH begins the accreditation review process by submitting an application. The application process must also be completed by a school or program seeking a change in category. A school or program must submit a written application, addressed to the CEPH president, which summarizes the ability of the school or program to meet the accreditation criteria. The school or program should be able to present its qualifications in 15 pages or less, plus appendices if needed. The application must include:

- 1. a statement indicating that the program or school understands the required components of the application process, including conduct of an on-site consultation visit, attendance at an Accreditation Orientation Workshop and prompt payment of all fees.
- 2. a request signed by the chief executive officer of the institution in which the school or program is located (university president or chancellor in most cases), inviting CEPH to initiate the accreditation process. The request should be cosigned by the chief administrative officer of the university unit in which the school or program is located and by the school dean or program director. In the case of a school or program that is sponsored by more than one institution, signatures must be obtained from the leadership at each institution.
- 3. documentation of the following eligibility requirements:
 - a. location in an institution that is regionally accredited (an applicant institution located outside the United States that is not eligible for regional accreditation must demonstrate a comparable external evaluation process);
 - b. establishment, or planned implementation (with timeline), of an organizational structure for the school or program with documented primary responsibility for curriculum development, admission standards, faculty selection and retention, and fiscal planning; documentation should include an organizational chart or charts that shows the program or school's internal organization and external reporting lines up to and including the president, provost or other chief executive, as well as a narrative explanation of the roles and responsibilities mentioned above;
 - c. a mission with supporting goals and measurable objectives for the school or program;
 - d. a curriculum for each degree included in the unit of accreditation that is consonant with CEPH criteria; documentation must include a list of required courses, practice experience, etc. and associated credit-hours, with brief course descriptions;
 - e. evidence of institutional commitment and fiscal support for the development of the school or program; documentation may include evidence of commitments for new or reassigned faculty and staff resources, as well as budgeted capital expenditures and or/administrative support;
 - f. policies and plans for recruitment and selection of faculty for the school or program;

g. policies and plans for recruitment and selection of students; documentation must include projected enrollments per year for each degree program included in the unit of accreditation.

If the application is for a public health program, then the applicant must meet the following additional eligibility requirements:

- h. have at least three full-time faculty who dedicate .50 full-time equivalence or greater effort to the public health program's teaching, research and service for each track, concentration or specialization in the unit of accreditation that offers master's-level education; the program must provide evidence that it meets this benchmark or will do so by the time of the site visit or within two years of the application date, whichever comes first (see CEPH criteria documents for additional information on required minimum faculty resources);
- i. has or will have graduated at least one class from a curriculum that meets CEPH criteria in each concentration, specialization or track included in the unit of accreditation by the time of the site visit or within two years of the application, whichever comes first.

If the application is for a school of public health, then the applicant must meet the following additional eligibility requirements:

- h. have at least five full-time faculty who are trained and experienced in the discipline for each core concentration area offering a doctoral degree and at least three full-time faculty plus two full-time-equivalent faculty in core concentration areas offering only the MPH or equivalent professional degree by the time of the site visit or within two years of the application date, whichever comes first (see CEPH criteria documents for additional information on required minimum faculty resources);
- i. offer the MPH or equivalent professional degree programs in at least the five core public health knowledge areas, as outlined in the accreditation criteria, or provide specific plans and timeline demonstrating that they will be in place with graduates in each program area from a curriculum that meets CEPH criteria at the time of the site visit or within two years of the application date, whichever comes first;
- j. offer doctoral degrees related to at least three of the five core public health knowledge areas (as defined in the accreditation criteria), with students enrolled in all three and a graduate from at least one by the time of the site visit or within two years of the application date, whichever comes first.
- k. have an independent structure and reporting mechanism that is equivalent to other professional schools or colleges within the university, as defined by the current accreditation criteria.

An application may be submitted at any time. However, the CEPH Board of Councilors, which makes the determination, meets to make accreditation decisions in the spring and fall. Applications must be submitted at least six weeks prior to the Council meeting. Meeting dates and related deadlines may be obtained from CEPH staff or by consulting the CEPH website. Applicants must submit one printed copy and one electronic copy of all application materials.

Once accepted as an applicant, a school or program must proceed toward accreditation and must promptly pay the application fee outlined in CEPH's schedule for accreditation support. Applicant

fees are not refundable if the school or program later decides to withdraw from the accreditation process. An applicant must schedule an on-site CEPH consultation visit, attend an Accreditation Orientation Workshop and submit an acceptable self-study document to CEPH offices within two years of the date when accepted as an applicant; failure to do so will result in termination of applicant status. At any time during applicant status, until the beginning of the Council meeting at which the accreditation decision is scheduled, a school or program may withdraw its application, on written notice to CEPH, and no further review activities will be conducted.

CEPH will consider applicant institutions located outside the United States; however, due to the variable nature and scope of international accreditation activities, such activity will be undertaken on a case-by-case basis. Prior to providing evidence of meeting the previously outlined eligibility requirements, international applicants must submit a written request for consideration. If the request for consideration is accepted, the Council will require a staff member and/or Council member to conduct a consultation visit before inviting a full application.

Accredited Schools and Programs

When accreditation is conferred, the Council designates a specific date through which that status is valid. Approximately two years before the end of the accreditation period, CEPH staff notifies the dean or director of the upcoming review and advises that the school or program should begin its self-study process. In the event a school or program does not wish to maintain its accreditation status, it should advise CEPH in writing, and no further review procedures will be scheduled.

All accredited schools and programs are expected to undergo periodic full evaluations, as described in subsequent sections of this manual. Extensions of term may be granted only by official Council action and will only be granted in the circumstances delineated in this document's section on extensions of accreditation term.

Schools or Programs Seeking Change in Category

The Board of Councilors will accommodate schools and programs seeking a different category of accreditation. Categories of CEPH accreditation include a) schools of public health and b) programs in public health. Additional categories of CEPH accreditation, which apply to both schools and programs are 1) collaborative (sponsored by more than one regionally-accredited institution) and 2) single-institution.

Accredited schools and programs seeking a change in category must submit an application as outlined in this document's section on applications. A school or program in transition from one category to another, for whatever reason, must also notify CEPH before making any substantive change that affects its mission or degree offerings. Multiple substantive change notices are common during the transition period.

Schools and programs making a transition must undergo a full accreditation review using the appropriate criteria within two years of notifying the Council or by the expiration of the current accreditation term, whichever occurs first. If the school or program fails to give notice before making the change or is unable to do so, the procedures related to changes that occur after award of accreditation will prevail. These procedures are described later in this document. Schools and programs can be accredited only in one category of each type at a time.

Timetable for Review

Review dates are determined in consultation with CEPH staff as soon as possible after a mutual decision has been reached to proceed with the review. Dates will be established for consultation, submission of the preliminary self-study document, submission of the final self-study document and for the site visit.

The review process for first-time accreditation is approximately three years from the date of the application's acceptance to the date of the Council's official decision, though it may be abbreviated, in consultation with CEPH staff, if special circumstances exist.

The review process for reaccreditation, from the date of submission of the preliminary self-study to the date of the Council's official decision, is approximately 10-14 months.

Cost of Accreditation Review

The Council has established fees for consultation, the accreditation review and continuing support; the support schedule is published separately and is available on the CEPH website. Fees differ for schools, programs and collaborative organizational models, by duration of the visit and for institutions located outside of North America. Schools and programs are also expected to reimburse CEPH for travel and expenses for site visit teams, site visit coordinators and consultants.

Payment of Fees and Expenses

A fee schedule is updated annually and is available on the CEPH website.

Applicant and accredited schools and programs must pay all fees as required. Failure to pay required fees by the deadline defined by CEPH will 1) postpone an initial accreditation decision (for applicants) or 2) result in removal from CEPH's list of accredited schools and programs.

The Council does not pay honoraria for the services of site visit team members but does reimburse actual site visit team expenses. Each site visitor submits a voucher, with original receipts, to CEPH for travel and expenses incurred in connection with the visit. CEPH reimburses each visitor and invoices the school or program for the total costs according to the Travel Expense and Reimbursement Policy, which is available on CEPH's website.

Consultation to Schools and Programs

CEPH staff is available to provide procedural consultation to any school or program seeking accreditation. While much guidance about CEPH policies, procedures and criteria can be obtained via telephone discussions and written communications, on-campus visits by CEPH staff also can be helpful in understanding the review process and interpreting the criteria used for evaluation. Schools and programs seeking first-time accreditation by CEPH, accredited programs or schools in transition to another accreditation category and international applicants are required to seek on-site consultation from CEPH. Consultation also is available to already-accredited schools and programs and especially those undergoing substantive transitions in such areas as organization or curriculum.

CEPH publications, including manuals describing CEPH procedures and criteria, may be accessed through CEPH's website: www.ceph.org. CEPH does not charge for its publications and cannot respond to requests for multiple copies. However, constituents may make multiple photocopies as needed.

Schools and Programs Under Review

Upon request, a CEPH staff member may visit a school or program early in the review process to discuss CEPH policies, procedures and criteria and to answer questions of administrators, faculty, students and others who will be involved in the self-study process. An offer of consultation is made in the letter of notification preceding the review. Throughout the review process, CEPH staff are available for telephone, written or personal consultation concerning the procedures and criteria.

Developing Schools and Programs

An on-site consultation visit by a CEPH staff member is required of all new applicants, although a school or program in any stage of development may request consultation as well. The visit focuses on CEPH accreditation criteria and procedures.

All final self-study documents are available for public review. Interested parties may request electronic access to or copies of final self-study documents directly from any accredited school or program (see this manual's section on Release of Reports and Information about Actions for additional information).

Collaborative Schools and Programs

Schools and programs that are sponsored by more than one institution of higher education but operate as a single organizational unit are eligible to seek accreditation as a single school or program. Collaboration, cooperation and formal affiliation among educational institutions may occur among schools and programs that are not operated as a single organizational unit, and these schools and programs are expected to pursue independent review and separate accreditation. Those that are operated as a single organizational unit are eligible to seek accreditation under CEPH's provisions for collaborative organizational models. Collaborative organizational models are evaluated against the same set of criteria as schools and programs sponsored by a single institution and are subject to the same policies and procedures with the following exceptions:

- Depending on the nature of the collaboration and the geographic proximity of the participating institutions, the Council may require, or the school or program may request, special accommodations in the structure of the site visit, including visiting multiple sites or extending the duration of the visit.
- Collaborative schools and programs must provide evidence during the review process of written agreements among the participating institutions.
- Collaborative schools and programs are shown in CEPH's published list of accredited schools and programs as a single listing, with each sponsoring institution identified.

Self-Study Process and Documentation

The self-evaluation process is the core of accreditation. CEPH criteria for a school or program call for an "explicit process for evaluating and monitoring its overall efforts against its mission, goals and objectives; for assessing the school's effectiveness in serving its various constituencies; and for planning to achieve its mission in the future." The criteria further require that the school or program "undertake systematic, broad-based and integrated evaluation of its activities."

Orientation Program

CEPH conducts an annual Accreditation Orientation Workshop that is required of all applicants and is recommended to representatives of institutions undergoing the reaccreditation process. The purpose of the workshop is to explain CEPH accreditation policies, procedures and criteria; to discuss the self-study process and expectations for the resulting document; and to elucidate guidelines for hosting a site visit. There is a fee for the workshop to cover expenses, and institutions are responsible for covering the cost of their own travel and accommodations.

Process

A new applicant is expected to address all of the criteria for accreditation including at least baseline data for measurement of outcomes. Particularly if the school or program is new, there may be relatively little historical data on which to base assessments.

The self-study is expected to address all of the accreditation criteria and provide thorough quantitative and qualitative documentation of compliance with the criteria. The focus of a full review must be the entire unit that is being reviewed, including all of its degree programs, and the manner in which it currently fulfills the expectations for accreditation. The expectations for the self-study document are the same for first-time and reaccreditation reviews.

To be of most value to the school or program, the self-study should involve institutional officers, administrative staff, faculty, students, alumni, community constituents (eg, staff members from agencies that partner with the school or program in education, research and service) and other stakeholders. A school or program has considerable latitude in conducting its self-study. Depending on existing administrative and committee structures, new groups and procedures may or may not need to be established. However, involvement of all constituent groups is essential. In the case of collaborative schools or programs sponsored by more than one educational institution, constituents from each institution must be involved in the process. Applicants in the past have used steering committees, task forces, departmental study committees and other self-study models. Whatever the model, it is important to assign responsibility for coordination. That role may be assumed by the dean or director or assigned to another individual or a small group.

Models used by other schools or programs are described in their individual self-study documents, which are available directly from them. Consultation regarding the self-study process is also available from CEPH staff. Whatever self-study methods are devised and implemented, these should result in an organized report of quantitative and qualitative information that describes and clearly analyzes the existing strengths and weaknesses and that presents specific plans for enhancing the strengths and correcting any deficiencies.

Product

The process of self-analysis should result in the preparation of a self-study document that addresses all criteria for accreditation. The criteria document defines the documentation necessary to demonstrate compliance with each criterion. In the case of an abbreviated review, the document should include documentation for all criteria representing those issues and concerns that CEPH and the school or program has established as the basis for the review.

As general guidance, the self-study document should be organized to facilitate an assessment by the reviewers about each criterion. It is helpful to reviewers if pages in the document are numbered sequentially and if sections are separated by tab dividers. Each criterion should be addressed in terms of the policy of the school or program regarding that particular standard, evidence that describes its performance and an assessment that supports a conclusion about how the school or program meets the particular standard. The assessment should be an analytical discussion that provides an insightful analysis of the strengths and weaknesses of the school or program. Data templates are provided on the CEPH website to facilitate a logical presentation of required data. Though the templates may need to be modified to fit the unique situations of each school and program, CEPH requests that institutions use them.

CEPH expects a succinct yet thorough self-study document which, except in rare circumstances, should be limited to 150 pages. Supplementary documents such as faculty curricula vitae, university reports, committee minutes, copies of student papers and theses, policy manuals, syllabi and copies of student and alumni survey instruments should be referenced in the document and made available in the electronic resource file. While CEPH recognizes that the electronic resource file may not be complete at the time of the submission of the preliminary self-study, it is expected that the school or program will be able to provide a) course syllabi, b) student handbooks, c) forms or handbooks for the practicum and culminating experiences, d) the faculty handbook, e) career services materials and f) student advising materials. All remaining items must be included with submission of the final self-study.

Procedures

A preliminary version of the self-study document must be submitted to CEPH five months prior to the scheduled site visit. A printed copy and an electronic copy should be sent to each of the preliminary reviewers. The preliminary reviewers typically include two Council members, the site visit chair and the site visit coordinator.

The purposes of this review are to determine whether the document is sufficiently descriptive and analytical to proceed with final scheduling of the site visit and to offer constructive comments about how the documentation should be improved prior to final submission to the site visit team. Within eight weeks, CEPH staff will relay the comments of the reviewers, including questions, suggestions for revisions in the documentation and requests for further or different information. The reviewers may find the preliminary document unacceptable, for example, if it is not analytical or if it is incomplete. Reviewers may also suggest that an applicant is not yet at a developmental stage in which a site visit would be successful, particularly in cases in which a school or program outlined plans to meet the eligibility requirements within the specified timeframe and they were not met. In this case, the Council may, in addition to providing specific feedback to the applicant, direct staff to work with the school or program to reschedule the visit.

If the review is not to proceed because the reviewers deemed the preliminary documentation unsatisfactory, CEPH will notify the school or program of the unacceptable features of the document

and of any other reasons necessitating the postponement. If this occurs, the school or program is at risk of having its accreditation status lapse before a visit can be rescheduled. The Board of Councilors will consider all available information at its next scheduled meeting and will determine what action should be taken. Consultation from CEPH staff will be available during the interval between the postponement and the CEPH meeting.

If the review is to proceed, copies of the final revised document should be distributed by the school or program one month prior to the site visit. CEPH staff is authorized to cancel a visit if the document is not received one month before the visit. The self-study document should be provided both in paper copy and electronic formats. The resource file should be provided in electronic format. The distribution includes one copy (paper and electronic) to each member of the site visit team, including the site visit coordinator.

Additional copies should be prepared for internal use or university purposes and for distribution on request. The final self-study document is a public document and must be available to interested parties upon request. The same principles apply to public disclosure of final self-study documents and to final accreditation reports. Please see this manual's sections on Developing Schools and Programs and on Release of Reports and Information about Actions for further information.

Required Opportunity for Third-Party Comment

Approximately three months before the scheduled site visit, the school or program should notify its major constituents that an accreditation review is scheduled and should indicate to them that written comments from third-parties will be accepted by CEPH until 30 days before the scheduled site visit. Such notice should include the name and mailing address of CEPH. The form of such notice is at the discretion of the school or program. Notification methods might include the following: a notice posted in a visible location, an announcement in a regular newsletter for constituents, an advertisement in the campus newspaper, a notice published on the website or e-mail listservs. Methods of soliciting third-party comments should be described in the self-study document and verifiable by an on-site evaluation team.

Site Visits

An on-site visit by a team of peer reviewers is an important component of the accreditation process. The team's assessment of the validity of the self-study document provides the primary basis for CEPH's decision concerning accreditation.

Roster of Visitors

CEPH maintains a roster of potential site visit team members with appropriate subdivisions for academician and practitioner members. The list is developed through a nominating process by peers and is designed to seek competent and knowledgeable individuals who are qualified by experience and training to serve on site visit teams. Nominators, as a minimum, include CEPH's corporate members, organizations representing professional disciplines within public health, selected associations and agencies representing the practice of public health, deans of schools of public health, directors of public health programs, former CEPH councilors and former site visitors.

The Council seeks nominations of potential site visitors who meet the following criteria:

- Hold a position as a senior academician (eg, dean, associate dean, department chair or program director).
- Have experience as an academic administrator/leader in addition to scholarly experience.

OR

• Hold a position as a senior public health practitioner (primarily employed by a public health department, non-profit organization, healthcare organization, etc. with at least 10 years of experience in public health).

AND

- Have at least a master's degree (practitioners) or a doctoral degree (academicians).
- Possess strong writing, communication and analytical skills.

The site visit roster is reviewed and periodically updated by the Board of Councilors and principal staff.

Training Programs

CEPH periodically conducts programs to train its site team members. The primary objectives of these training sessions, typically held in conjunction with annual meetings of the American Public Health Association, are to ensure that site visitors are fully knowledgeable about CEPH accreditation policies, procedures and criteria, and are clear about their roles as agency representatives. Materials are developed for orientation and training purposes as needed. Individual guidance also is provided in various CEPH documents that are distributed to each team member prior to each site visit. Finally, guidance is provided during a pre-visit team conference call and an executive session of the team the evening before the site visit, at which time procedures and processes are discussed and roles and assignments clarified.

Selection of Site Visit Teams

CEPH site visit teams for schools of public health include four members:

- a. A chair, who has significant experience with CEPH site visits. This member may be a public health academic or practitioner member.
- b. A site visit coordinator, drawn from the full-time staff of CEPH, specially trained consultants with significant experience in accreditation or from a cadre of experienced CEPH site visitors specially trained to assume the role.
- c. Two additional members, one of whom must be a public health practitioner and one of whom must be a public health academic, unless either the chair or coordinator meets those designations. A minimum of two academics will serve on all site visit teams for schools.

Site visit teams for programs outside schools of public health include three members:

- a. A chair, who has significant experience with CEPH site visits. This member may be a public health academic or practitioner member.
- b. A site visit coordinator, drawn from the full-time staff of CEPH, specially trained consultants with significant experience in accreditation or from a cadre of experienced CEPH site visitors specially trained to assume the role.
- c. One additional member, who may be a public health academic or practitioner, depending on the designation of the chair.

All site visit teams include at least one academic member and one practitioner member. A larger or smaller team may be requested of CEPH or required by CEPH, depending on the need to properly evaluate the school or program. Any deviation from the standard site visit team size must be negotiated with CEPH staff.

Team chairs are reviewed and approved by the CEPH president and may be CEPH councilors, previous councilors or other individuals with extensive experience on CEPH site visit teams. The team composition is determined in consultation between staff and the CEPH president, who appoints team members. Schools and programs may not select the individuals who will visit their campuses.

CEPH staff is responsible for inviting and confirming the team members' participation and informing them about the dates of the visit, the length of time for which their participation will be required, their responsibilities during and after the visit, reimbursement of expenses and CEPH's policy regarding conflicts of interest.

Schools and programs are advised of the proposed team composition and provided an opportunity to identify any conflicts of interest. If a conflict of interest exists, CEPH will seek a replacement for that team member. A list of the final team with each visitor's name, address and professional affiliation is sent to the school or program three months before the site visit.

Site Visit Scheduling

Visits to schools of public health require three days, plus the evening preceding the arrival of the team on campus. Visits to programs outside schools of public health require two days, plus the evening preceding the visit. The duration of the visit may be shorter or longer if special circumstances dictate the need for less or more time to accomplish the work of the site visit team. Unusual circumstances might include, for example, a visit focused on a narrow set of issues, a visit to a particularly complex or collaborative school or program or a visit to a school or program where the team needs to observe more than one geographic site. The school or program may request a shortened or extended visit or, in some circumstances, CEPH may require a longer site visit or an increase in the number of site visitors to ensure a thorough review. Any deviation from the standard must be negotiated with CEPH staff and is reflected in the fees charged.

The school or program is asked to prepare a schedule for the visit consistent with suggested schedules available on the CEPH website. Site visit teams find it helpful when the agenda is structured around the criteria, thus helping to focus the interviews. Every agenda will be slightly different, depending on the nature of the school or program and the nature of the issues identified in the self-study. The time allocated to various meetings will be determined by the specific needs of the particular school or program. The schedule should be prepared as soon as CEPH staff advises that the review is to proceed, following the review of preliminary documentation. Schools and programs should consult by phone or e-mail with CEPH staff regarding the proposed agenda no later than two months before the site visit, but the schedule should be sufficiently flexible to allow the site visit team to request adjustments. Changes may be needed to accommodate particular concerns of team members or their perceptions about the most expeditious and effective ways to pursue their tasks. Ample time must be scheduled for executive sessions. The scheduling of working luncheons with groups or for executive sessions is appropriate.

Depending on the structure of the school or program and the specific issues to be addressed, the team will need to meet with a broad representation of school or program constituents. These normally include university officials, school or program administrators, faculty, students, alumni and community representatives such as field placement preceptors. Typically, the team should meet with these constituent groups, particularly university officials, without the presence of the school dean or program director.

The school or program should reserve a convenient meeting room for use by the site visitors during their time on campus. The room should provide easy access to a computer with high-speed internet access and a printer. In specific circumstances, the visitors may also want to inspect campus facilities such as the library, laboratories and computer centers.

The final session on the schedule should be an exit interview during which the team chair will present a brief summary of the team's findings. It is the prerogative of the dean or director to determine who should attend the exit interview, but CEPH considers it appropriate to invite other representatives of the school or program as well.

Joint Visits with Other Accrediting Agencies

CEPH will consider requests for concurrent or joint visits with other accrediting agencies on a case-bycase basis. Due to the complicated nature of coordinating multiple agencies' logistics, such visits will only be approved if they are mutually beneficial to the agencies involved and to the school or program.

Other Preparation for the Site Visit

CEPH sends written notice to the chief executive officer of the university and the chief administrative officer of the appropriate university component about the scheduled site visit. The school or program should ensure that CEPH is regularly updated with these individuals' names and contact information as incumbents leave or new individuals are appointed.

School or program personnel should make hotel reservations for all site visit team members and request that the hotel send confirmations to the individuals. One month before the visit, the school or program should send to each team member a copy of the final self-study document and electronic resource files, a copy or electronic link to the current bulletin or catalog and a site visit agenda. CEPH provides each team member with a list of the team members, the procedures manual, the applicable criteria document, a copy of the last accreditation report (if any), the last interim report (if any) of the school or program, the code of good practice for accrediting bodies, travel guidelines and an expense reimbursement form and any other pertinent information.

Electronic Resource File

The school or program must include any materials referenced in the self-study document and any other information that provides evidence of compliance with the accreditation criteria in an electronic resource file. Documentation describing the methods of advertising used by the school or program must be provided to the site team. Advertising, promotional materials or recruitment literature used by the school or program to describe its educational offerings (including catalogs, bulletins, publications or combination of publications) must accurately describe its academic calendar, admission policies, grading policies, degree completion requirements, tuition and fees. The school or program also will need to provide evidence in its resource file that it tracks degree completion rates of its students and rates of job placement or other measures of success of its recent graduates, and the resource file should contain information that allows site visitors to verify the process through which the school or program provided opportunities for third-party comments during the accreditation process.

The electronic resource file should include a) examples of student work (theses, graduate research projects and field placement reports); b) schedule of courses offered (with instructor identified) over the last three years; c) minutes of all committee meetings except for minutes of meetings or portions of meetings that deal with individual personnel actions; d) faculty curriculum vitae; e) course syllabi; f) personnel manuals; g) survey and course evaluation responses and data summaries; and h) a record of written student complaints and grievances, if any, for the past three years. Unless CEPH specifically asks during a review of a preliminary document that certain materials be included as part of the self-study document, the school or program may conclude that it is appropriate and acceptable to include these materials as part of the electronic resource file. Sensitive materials that would compromise confidentiality may be provided on site if it is not possible to include them in the electronic resource file. In addition, materials that are not available electronically (eg, posters and very long documents) may be provided on site.

Conduct of the Visit

During a conference call in advance of the site visit and at the initial on-site executive session of the team, the chair will propose a plan of action for the site visit. He or she will assign responsibilities for pursuing particular lines of inquiry, for validating certain sections of the self-study and for preparing specific portions of the site team report. During executive sessions throughout the visit, the chair will evaluate progress of the team and may make additional or revised assignments. The chair may also

consult with the dean or director to assess the progress of the visit or to arrange changes in the agenda if necessary.

Throughout the site visit, the team members will seek information to validate the self-study document. In meetings with administrators, faculty, students and other groups, the visitors will explore issues identified by the team during the executive sessions. They will seek open and frank discussions that clarify and expand on information in the self-study and electronic resource file. They will review other materials requested on site to verify information in the self-study document and to assess the manner in which the school or program interacts with and represents itself to its various constituents. They will seek to identify strengths and weaknesses of the school or program, based on their findings and observations. The site visit requires the participation of a number of stakeholders including administrators, faculty (including various ranks), students, alumni, preceptors and community members with ties to the school or program. All individuals should be prepared for discussion and should be willing and able to discuss their perspectives and experiences with the school or program.

In executive sessions, the team will discuss their findings and observations and organize and prepare their comments for succinct presentation in a final session with school or program administrators and other stakeholders as determined by the school or program.

Reports and Decisions

Site Visit Team Report

Site visit teams are expected to make a written determination about whether a school or program complies with each of the established accreditation criteria. The Council uses the following standard terminology to describe compliance in the site team reports:

• This criterion is met.

The school or program fully complies with or exceeds the expectations embodied in the criterion.

• This criterion is met with commentary.

The school or program evidences the minimum characteristics expected by the criterion, but some aspects of performance could be strengthened.

This criterion is partially met.

The school or program fails to meet one or more parts of the multiple-part criterion or one or more components of the school or program fails to meet the standard.

This criterion is not met.

The school or program fails to meet the criterion in its entirety or performs so poorly in regard to the criterion that the efforts of the school or program are found to be unacceptable.

The written report, which represents an independent analysis by the site visit team, should present an assessment of compliance with each criterion, including the identification of areas needing improvement. The report will identify any deficiencies in compliance with criteria by 1) returning a finding of "partially met" or "not met" and 2) identifying the specific deficiency as a "concern." In all cases, the report should address the school or program's performance with respect to student achievement. If the school or program offers degree programs in off-campus locations or in distance or executive formats, the written report should address these specifically.

Before completing the site visit, members of the team will provide the chair with the written material they have been requested to prepare, which will include assessments of the extent to which the school or program is in compliance with CEPH criteria. Using this and other material, such as notes made during the visit, the self-study and supplemental materials distributed at the visit, the site visit team will prepare an oral presentation to be made to school or program officials at the end of the visit.

This material will serve as the basis for the first draft of the team's report that will be edited by the site visit coordinator following the visit. The draft will be distributed for review and comment to all members of the site visit team, who will be asked to respond by a specified date. The team's revisions will be incorporated in a second draft, which will be sent to the school dean or program director within eight weeks of the site visit's completion.

The school or program has at least 30 days to review this draft and provide the written response. The school or program administrator may involve as few or as many of the faculty and students in reviewing this draft as he or she wishes. In addition to supplying any needed factual corrections, a school or program may prepare a written response to the team's findings. In this response, it is appropriate to note any disagreements with the findings and opinions of the team or to provide supplemental information that may be helpful to the Council's deliberations.

The final site visit report will be prepared by the visit coordinator and will include the school or program corrections and any further revisions. It will be sent, along with the written response of the school or program, to each CEPH councilor 30 days prior to the meeting at which the decision is to be made. At the time the final site team report is distributed to the Board of Councilors, a copy of the report will be sent to the chief executive officer of the educational institution. The chief executive officer will be provided an opportunity to review the report and comment on it prior to the meeting at which the accreditation decision is to be made.

Completion of the review process, from the site visit to the Council's consideration of the site visit report, requires a minimum of four months. The CEPH Board of Councilors will review the report at its next scheduled decision-making meeting, provided that the meeting is at least four months in the future. In general, reports from site visits held in February through June will be considered at the fall meeting, and visits from July through January will be considered at the spring meeting. Spring and fall meeting dates are determined approximately one year in advance.

CEPH Decisions

Each report under consideration by CEPH at a regular meeting is presented by two councilors who have not participated in the site visit to the school or program. In special circumstances, the Council may request to meet with a representative of the school or program, either by phone or in-person, during this meeting. In arriving at a decision, the board will consider the self-study document, the team's written findings, the school or program's written response, the institutional chief executive officer's response, if provided, and other written material that is available. Following the presentation and subsequent discussion, a Council member will present motions for two separate actions by the councilors: one is the adoption of the team's report, with or without amendment, as the Council's official report to the university, and the other is a decision about accreditation, including status, term and interim reporting requirements, as appropriate.

As part of its decision, the Council will formally adopt the site visit team's report with any revisions it deems appropriate and necessary on the basis of the evidence used in arriving at its decision. This report becomes the Council's official report. A copy of CEPH's official report will be sent with a cover letter from the CEPH president to the chief executive officer as notification of CEPH's decision within 30 days of the decision. The Council's report is sent with a letter from the CEPH president to the school dean or program director.

Councilors who have a conflict of interest in relation to the school or program under review must declare such and abstain from participating in related discussion and decision making. A separate policy statement on conflicts of interest adopted by CEPH guides decisions pertaining to conflicts. A conflict of interest occurs because of an individual's potential ability, or perception of an ability, to influence a decision, not in his or her knowledge about the decision. All parties, including those who may have had a conflict of interest, are bound by confidentiality restrictions imposed by CEPH procedures.

Possible accreditation decisions by the Council include the following:

- 1. **Accreditation** A school or program demonstrates minimum compliance with all applicable CEPH criteria. Accreditation may be conferred with requirements for interim reports or other types of follow up.
- 2. **Extension of Term** The Council may extend accreditation for good cause when it determines, on the basis of an interim report, that a school or program has not demonstrated that it meets all accreditation criteria but has made sufficient progress toward compliance to constitute good cause for extension. Additionally, when a school or program seeking to make a transition from one accreditation category to another fails to meet the requirements for accreditation under the new category, the Council may award one additional year on its existing term under the original accreditation category. An extension of term may also be used when the Council agrees to postpone a regularly scheduled visit for extraordinary reasons.
- 3. **Denial of Accreditation** A school or program in applicant status does not meet the criteria for accreditation.
- 4. **Probationary Accreditation** An already-accredited school or program is judged deficient in resources and procedures to continue to accomplish its stated mission and objectives, or fails to meet the requirements for its reaccreditation review or interim report requirements. This status is conferred for a specific length of time but may not exceed three years in total. The three-year period includes up to two years in which the school or program must come into compliance with the accreditation criteria and, if it fails to do so, up to an additional year to remedy the deficiencies if the school or program shows good cause.
- 5. **Revocation of Accreditation** A school or program does not meet the criteria for continued accreditation, or does not permit a reevaluation after proper notice by CEPH. Revocation also applies when an institution disestablishes or closes a school or program.
- 6. **Deferral** In rare circumstances, the Council may require further information to be able to make an appropriate decision on accreditation. The Council will define a specific time limit for deferral, and the program or school will maintain its existing classification (eg, applicant) and status (eg, program) until the time of the Council's next decision.

Denial of accreditation and revocation of accreditation are adverse actions. Adverse actions and the conferral of probationary accreditation are appealable actions. Deferral, extension of accreditation and extension of probationary accreditation for good cause are not adverse or appealable actions. CEPH notifies the dean or director and the chief executive officer of an institution, stating specific reasons for the adverse action or probation. Appealable actions are not made public for 30 days following notification, during which time a school or program may appeal the decision. Appeals procedures and reporting of appealable actions are described later in this document.

Limitations on Actions

In granting accreditation to a school or program, the Council will take into consideration actions by a regional institutional accrediting body to deny accreditation, revoke accreditation or place an institution on probation. Similarly, it will take into consideration the action of a state agency to suspend, revoke or terminate the institution's legal authority to provide postsecondary education. If the Council grants initial accreditation to a school or program notwithstanding the adverse actions of the institutional accreditation body or the state agency, the Council must submit a thorough explanation to the US Secretary of Education.

Since public health programs are often administratively located with or related to units accredited by other specialized accreditors (eg, in schools of medicine), any action by another specialized accrediting agency to suspend, revoke, terminate or confer probationary accreditation will also be considered by the Council.

Accreditation Terms

An accreditation term is the period during which the accreditation status remains valid. Schools and programs seeking initial accreditation are eligible for a maximum term of five years. After initial accreditation, schools and programs typically are subject to review on a seven-year cycle. Schools and programs that seek accreditation under a different category are considered to be seeking initial accreditation under that category. The Council may vote to schedule the date of a site visit for a school or program before the end of an accreditation term if it is deemed necessary based on findings of the accreditation review or based on information reported in an annual report, interim report or substantive change notification. Other types of follow up may also be required including, but not limited to, interim reports, an abbreviated accreditation review or a visit by CEPH staff and/or a Councilor.

Accreditation status – including accreditation and probationary accreditation – is stated as valid through a specific date. Accreditation will automatically lapse at the conclusion of the term unless certain conditions have been met. In the case of a reaccreditation review, an on-site visit must have been conducted prior to the termination date; in the case of probationary accreditation, the school or program must have submitted an acceptable self-study document prior to the termination date and scheduled its site visit. If these conditions have been met, the accreditation status will continue until the first meeting of the Board of Councilors at which the reaccreditation decision can be made. If a school or program fails to permit reevaluation after proper notice, the accreditation status is subject to revocation at the time the term lapses.

A school or program may request a postponement of its regularly scheduled review but only for extraordinary reasons. A request for postponement must be made in writing at least 12 months prior to the expiration of the term. Any exceptions to this must be approved by the Board of Councilors. A decision to postpone a regularly scheduled review requires action by the Council to extend the current accreditation term by a specific period of time.

The effective date and termination date of an accreditation term are important because accreditation status sometimes establishes eligibility of a school or program for participation in certain federal programs and/or establishes the qualifications of graduates to pursue certain career opportunities. The Council's procedures are structured, to the extent possible, to protect the interests of students who enter an accredited school or program with the expectation that they will graduate from such. An accredited school or program must be aware of decisions that may put students at risk and must represent those possibilities accurately. For clarification:

- 1. Initial accreditation is effective on the date of the decision by the Council; it is not retroactive.
- 2. Accreditation or probationary accreditation continues in effect until the first CEPH meeting at which a decision can be made, providing the conditions noted above have been met.
- 3. Probationary accreditation, which is only available to accredited schools and programs, may not extend beyond three years, including two years to come into compliance and one additional year if the school or program can show good cause. At the conclusion of this time period, the Council must either revoke accreditation or return the school or program to accredited status, based on a full or abbreviated review.
- 4. Extension of term caused by the failure of a school or program to meet the requirements for accreditation under a different category of accreditation may not extend beyond one year; the Council must deny or revoke accreditation at the conclusion of the term unless the school or program, based on a full or abbreviated review, qualifies for accreditation under the new category.
- 5. Accreditation lapses on the date specified if the school or program fails to schedule a timely reevaluation after proper notice.
- 6. Accreditation or probationary accreditation lapses on the date of dissolution or disestablishment of a school or program by its parent institution.

Interim Reports

In situations where a deficiency exists at the time the accreditation decision is made but when reasonable remedial actions could bring the school or program into compliance with the criteria, CEPH will require an interim report. The request for an interim report will specify the areas of deficiency and the date of expected submission. In situations where a school or program is not in compliance with an accreditation standard, the Council must require the school or program to come into compliance within two years, a period that may be extended only for good cause. In determining whether good cause exists for an extension, CEPH may consider a number of factors, including, but not limited to, progress toward achieving full compliance, the complexity of the changes that must be made, financial considerations, logistical considerations, and other circumstances internal and external to the school or program that might affect the time needed to come into full compliance. If a school or program fails to bring itself into compliance within the specified period, the Council must revoke the accreditation of the school or program.

It is the responsibility of the school or program to submit one printed copy and one electronic copy of the interim report to CEPH offices on a timely basis. The report will be copied, distributed to and reviewed by the Board of Councilors, which will report its findings in writing to the school or program. The Council will act either to accept the interim report or to not accept the interim report. Interim reports are accepted if the Council concludes, based on evidence provided in the interim report, that the school or program has demonstrated full compliance with the criteria. If the school or program has not fully resolved the cited deficiencies, the Council must act not to accept the interim report and must a) revoke the accreditation of the school or program; or b) extend the time period by which the school or program must come into compliance. For the Council to grant an extension of the time period for achieving compliance, the school or program, as part of its interim report, must show cause for not fully resolving the previously stipulated deficiencies. The Council will award an extension of the time period for achieving compliance only if the school or program has made substantial progress toward compliance and the quality of the program is not in jeopardy.

The Council determines the appropriateness of an extension of time for achieving compliance on a case-by-case basis. If a school or program does not submit a requested interim report, the Council will revoke the accreditation of that school or program.

When an accreditation term is awarded for a period less than the maximum possible, the Council may at its discretion require an interim report and specify that an extension of the term is possible, pending a future determination by the Council that one or more cited deficiencies have been resolved satisfactorily. If the Council, at the time of the original accreditation decision, offered to extend the accreditation term based on demonstration that the school or program has fully resolved the cited deficiencies, a separate decision must be made regarding the extension of the accreditation term. If the Council, at the time of the original decision, did not offer to extend the accreditation term, the CEPH governing body may do so at its sole discretion if it concludes that all deficiencies have been fully resolved.

Public Notifications

Within 30 days after a final accreditation decision, the Council formally notifies agencies about the action. These include, at a minimum, the USDE, other recognized accrediting agencies and state higher-education licensing or authorizing agencies. Decisions to be reported to these bodies include a decision to award accreditation; a decision to deny or revoke accreditation; a decision to place an institution on probation; a decision of an accredited institution to voluntarily withdraw from accreditation; or a decision by an accredited institution to allow its accreditation status to lapse.

If a final decision is to deny or revoke accreditation status or to place a school or program on probation, the notice to the USDE, other recognized accrediting agencies and state higher-education licensing or authorizing agencies will occur at the same time that CEPH notifies the school or program. CEPH will notify the public of its final decision to deny or revoke accreditation or to confer probationary accreditation within 24 hours of its final notification to the school or program. As noted elsewhere in these procedures, adverse actions become final 30 days after the school or program has been notified of its opportunity to appeal the decision or at the conclusion of the appeal, whichever occurs first.

If the final decision is to deny or revoke accreditation status, the Council will also prepare a brief statement summarizing the reasons for the agency's action. The Council will provide this brief statement to the affected school or program within 20 days of the final decision. The Council will offer the affected school or program the opportunity to submit written comments on the statement. The Council will provide this brief statement to the USDE, other recognized accrediting agencies, state higher-education licensing or authorizing agencies and the public within 60 days of the final decision, and will append the school or program's written comments if the school or program elected to submit such a statement within 50 days of the final decision.

As a recognized agency, the Council is also required to report to the USDE the name of any institution or program the Council has reason to believe is failing in its responsibilities under Title IV of the Higher Education Amendments or is engaged in fraud or abuse and to report the reasons for the agency's concerns.

Release of Reports and Information about Actions

The official accreditation report must be made available to the public on request 60 days following the date of the final accreditation decision. Copies may be provided electronically or in hard copy (for reasonable reproduction costs, with the latter). Interested parties may request copies from the school or program or from CEPH, but all requests for accreditation report copies received by CEPH will first be referred to the school or program.

Schools and programs that wish to facilitate such requests may make their final self-study documents (as submitted to CEPH) and final accreditation reports publicly available on the school or program website, eliminating the need for reviewing and responding to individual requests. Schools and programs who plan to respond to individual requests must clearly indicate on the school or program website how to contact an appropriate person to request a copy of the final self-study document or final accreditation report.

The school or program may append a written response to the accreditation report whenever it releases the full report. If the school or program provides a copy of its written response to CEPH within 50 days following the final accreditation decision, CEPH will append the response whenever it distributes a copy of the full report.

Annual Reports to CEPH

All accredited schools and programs of public health are required to submit an annual report to CEPH, using a prescribed format. The purpose of the annual report is to allow the accrediting body to monitor significant changes in the school or program between on-site visits. Annual reports must contain at least the following information: fiscal information, measures of student achievement and headcount enrollment data. Collaborative schools and programs must submit a single annual report that accurately portrays all components of the school or program.

Prior Notification of Substantive Change

The school or program must notify CEPH before making any substantive change that affects its mission or degree offerings after accreditation has been awarded. It is the responsibility of the school or program to promptly notify CEPH of its intent to implement a change, describing the change fully in writing.

A substantive change includes, but is not limited to, the following changes: a major change in the established mission or objectives of the school or program; offering of a new degree; the addition or discontinuance or temporary suspension of an area of specialization; the offering of a degree program that differs substantially in method of delivery from those previously reviewed; the offering of a degree program at a site distant from the school or program; a substantial increase or decrease in the length of a degree program; and the revision of basic requirements specified in the accreditation criteria for professional degrees.

In general, changes within universities require multiple levels of approval, and the period before implementation of the change (eg, before enrolling students in a new degree or concentration) provides ample time to notify the Council. As a general rule, provide notice to the Council after a curricular change has been approved through appropriate channels but before students enroll.

All notices of substantive change must include:

- a cover letter that clearly and fully describes the change, and
- supporting documentation that will allow the Council to evaluate the change and determine whether the change may impact continued compliance with the accreditation criteria.

Curricular changes are the most common type of substantive change. When submitting a curricular change, the school or program should ensure that the supporting documentation includes all of the elements below:

- number of students in the new degree/specialization (projected enrollment)
- list of required coursework
- competencies associated with the degree/specialization
- a faculty list highlighting the faculty supporting the new degree/specialization

The school or program must provide one printed copy of the letter and attachments, mailed to CEPH's offices, and one electronic copy of the letter and attachments. The Council or the Council's Administrative Committee will review the notice at the next meeting for which the docket remains open. The Council will provide written notice of its determination relating to any substantive changes within 30 days of the meeting's completion.

Other Changes that Occur After Award of Accreditation

It is the responsibility of the school or program to promptly notify CEPH if significant changes occur in its environment that might necessitate a review by CEPH. These include, but are not limited to, loss of legal authority to operate and adverse actions by other recognized accrediting bodies, including public probation and revocation of accreditation. These changes would include accreditation actions related to university or larger administrative units in which the school or program is located and to principal programs offered by the school or program.

When CEPH awards accreditation, it does so based on the expectation that the school or program will continue to comply with the accreditation criteria over the term of accreditation. If changes occur that might have a negative impact on the school or program's ability to continue to meet the accreditation criteria, it is the responsibility of the school or program to notify CEPH in writing of such conditions. The Council will review this written notice at its next regular meeting. While this generally will be for information purposes, the Council may, at its discretion, request additional reporting, initiate a special inquiry or require a full or abbreviated review.

Possible Council Actions between Regularly Scheduled Reviews

If at any time in the interval between scheduled reviews an accredited school or program undergoes major organizational changes that may affect its administration, scope or quality, the school or program may request a reevaluation by CEPH, or the Council may require a review before the date stipulated. Information that may prompt a special inquiry or an early review may come from several sources, including interim reports to CEPH, annual reports to CEPH, required notifications from the school or program regarding changes that occur after the award of accreditation, notice of substantive change, notice of actions by the USDE or the appropriate state agency, notice of adverse actions by relevant accrediting bodies, a record of excessive complaints lodged with CEPH about a school or program and other sources. Failure of a school or program to submit required reports and notices to CEPH on a timely basis may also prompt a special inquiry or early review.

An already-accredited school or program may undergo an abbreviated review that focuses on a narrowly defined set of issues identified by CEPH. This might occur, at the discretion of the CEPH Board of Councilors, when a school or program is placed on probation or has serious deficiencies that require on-site follow up, or if the Council determines a need for additional on-site information as described above. While the school or program must meet all of the accreditation criteria, the self-study process may be directed at those issues identified as particularly problematic. When the CEPH governing body authorizes an abbreviated review, it will specify the scope of the review and may specify the composition of the site visit team, the duration of the visit or other modifications.

Before the Council requires an early full review, it may exhaust other avenues for determining the continued compliance with the accreditation criteria. It may, for example, a) ask for written clarification from the school or program, b) require on-site consultation by a CEPH councilor and/or staff member or c) require an abbreviated review that focuses on a limited set of issues relating to the specific conditions that prompted the request for a reevaluation.

The decisions available to the Council following an abbreviated review shall include continuation of the current term, extension of the current term for up to two additional years, probation and revocation of accreditation. If an early full review is necessary, CEPH will notify the school or program in writing and will establish a timetable for the submission of the self-study document and on-site visit. The date of the on-site visit shall be no more than 18 months from the date of notification.

The Council will promptly review the accreditation status of any school or program in an institution whose recognized institutional accrediting agency takes adverse action against the institution to determine whether the Council should take adverse action against the accredited school or program. Similarly, if a program in a CEPH-accredited school of public health loses its accreditation or is placed on probation by another recognized specialized accrediting body or if a school in which a CEPH-accredited program is located loses its accreditation or is placed on probation by another recognized specialized accrediting body, CEPH will promptly review the accreditation status of that school or program to determine whether the Council should take adverse action. The determination will be made at the next regularly scheduled meeting of the Board of Councilors and may result in no action, in the initiation of adverse action against the school or program or in the request for additional information to allow CEPH to better assess the reasons for the adverse action by the other accrediting body and the implications for the CEPH-accredited school or program.

Publication of Accredited Status

A list of accredited schools and programs is updated biannually or more frequently as needed. The list is available on the <u>CEPH website</u>. This list identifies the date of initial accreditation and the date by which the next review must take place for each accredited school or program. All final decisions are recorded in the annual reports of CEPH, including decisions to grant or withdraw accreditation status, decisions to confer probationary accreditation status and decisions of schools or programs to voluntarily withdraw from the review process. CEPH annually submits to the Secretary of Education a copy of its list of accredited schools and programs and its annual report.

Schools and programs must disclose their CEPH accreditation status accurately, including the academic units or instructional programs covered by that status and category of accreditation. In the event a school or program misrepresents or distorts the findings of the accrediting body, CEPH will take corrective action, including release of a public statement and release of part or all of the official accreditation report.

An accredited school or program must be forthright regarding its accreditation status. Each school and program must:

- 1. Present itself and its degree programs completely and accurately in publications and materials provided to students and prospective students, including, but not limited to, catalogs, recruitment brochures, student handbooks or manuals and the website.
- 2. Represent its category of accreditation accurately to the public; 1) accredited public health programs seeking a change in accreditation status may not refer to themselves as schools or colleges of public health until an application for accreditation as a school of public health has been submitted to and approved by CEPH, and 2) in collaborative schools and programs, each partner institution must ensure accurate representation of the category of accreditation and of the degrees included in the unit of accreditation.
- 3. Disclose its accreditation status and make available the name, address, website and telephone number of CEPH.

Publication of Applicant Status

For CEPH purposes, the term "applicant" means that a school or program has received official notification from the Council that its application to begin the accreditation process has been accepted. If the school or program elects to withdraw its application for any reason, it must remove the term "applicant," as it relates to CEPH accreditation, from all materials, including print materials and websites, within 24 hours of providing notice to the Council. The Council will publish and maintain a list of applicant schools and programs on its website.

Because accreditation terminology may be confusing to the general public and because schools and programs may withdraw their application at any time without penalty, applicant schools and programs must use only the following language when presenting their status to the public: "___ is an applicant for accreditation by the Council on Education for Public Health."

Applicant schools and programs are encouraged to disclose as much information as possible to the public regarding their progress toward accreditation, including their site visit dates, anticipated accreditation decision date and the name and contact information for CEPH.

Maintenance of Records

CEPH must maintain complete and accurate records of the most recent accreditation review of each school and program. Records include official accreditation reports, institutional responses to reports, interim reports, official correspondence between CEPH and the institution and self-study documents with attachments. Except for self-study documents and attachments and the official accreditation report, official records are confidential and not distributed publicly by CEPH. CEPH also maintains complete and accurate records of all accreditation decisions, including adverse actions, in formally adopted minutes and in annual reports.

Appeal and Complaint Procedures

Appeals

If the decision of the Council is to place a school or program on probation or to deny or revoke accreditation, CEPH notifies the school dean or program director and the chief executive officer of the university. In the notice, a specific statement of reasons for the action is given, as well as information about the right to appeal.

The action will not be made public for 30 days. During that time period, which begins on the date the school or program receives CEPH's decision letter, the school or program may file a notice of appeal in writing and request an appeal hearing. If the school or program initiates the appeal within the prescribed 30 days, there is no change in accreditation status pending disposition of the appeal and the action is not made public. If the school or program does not file a written notice of appeal within 30 days, the Council's action becomes final and public. The appeal fee shall be due at the time the school or program files its notice of appeal.

The school or program bears the burden of proof on appeal. The grounds for appeal are a) that the Council's decision was arbitrary, capricious or not supported by substantial evidence in the record on which the Council took action; or b) that the procedures used by the Council to reach its decision were contrary to the Council's By-Laws, Accreditation Procedures or other established policies and practices, and that procedural error prejudiced the Council's consideration. The appeal will be limited to only such evidence as was before the Council at the time it made its decision.

The Appeals Panel will consist of three members, none of whom served on the site visit team or are current CEPH councilors. Each member of the Appeals Panel is subject to CEPH's conflict of interest policy. The Appeals Panel will include one public health practitioner, appointed by the American Public Health Association; one member of the faculty or administration of an accredited school of public health; and one generalist educator, appointed by the appropriate regional accrediting commission. The Appeals Panel will select one of its members as chair.

The appellant school or program shall be notified of the composition of the Appeals Panel as soon as it is constituted and shall be afforded the opportunity to present objections to the selection of any member of the Panel based on conflicts of interest. The school or program has the right to be represented by counsel during the appeal process.

The hearing shall occur no later than 90 days from the panel's designation. Notification of the hearing will be made to all parties concerned. A school or program shall be required to submit a detailed written statement setting forth its position on appeal. This statement must be provided to the Appeals Panel at least 15 business days prior to the appeal hearing. In addition, the school or program may, in its notice of appeal, request that the record considered by the Council in reaching its decision be made available to it. The record shall include, but is not necessarily limited to:

- a. CEPH Procedures Manual, applicable at the time of the review;
- b. CEPH Criteria for Accreditation, applicable at the time of the review;
- c. Relevant self-study document of the school or program;
- d. Relevant accreditation reports and responses to those reports by the school or program; and
- e. Relevant written communications to and from the school or program regarding the review, including any prior decision letters.

Opportunity to appear before the Appeals Panel will be extended to representatives of the school or program and its counsel. The school or program will have 60 minutes to orally present its position. Thereafter, the Appeals Panel will direct questions to and hear responses from the school or program. The school or program will also be permitted to make a closing statement. A written transcript will be made of the hearing. All sessions in which the Appeals Panel meets to organize its work, as well as all deliberations of the Appeals Panel, will be conducted in executive session.

In reaching its decision, the Appeals Panel will consider the record before the Council at the time it made its decision, the school or program's written appeal statement, any presentation made by the school or program at the hearing as well as the school or program's responses to questions from the Panel members. The Appeals Panel will base its decision on conditions as they existed at the time of the Council's decision and will not consider new evidence not before the Council at the time of its decision. Consistent with the standard for review on appeal, the Appeals Panel considers whether the decision was arbitrary and capricious or not supported by substantial evidence that existed in the record at the time of the Council's decision, and whether the action of the Council was in accordance with its established procedures.

The Appeals Panel, on a majority vote, either affirms, amends, reverses or remands the decision being appealed. If the Appeals Panel affirms the decision, the decision becomes final at that time. If the Appeals Panel amends, reverses or remands the decision, it must provide a detailed written explanation of its rationale. The Council will implement the Appeals Panel's decision in a manner consistent with any directive of the Appeals Panel and the Accreditation Procedures. Implementation includes the ability to define the length of an accreditation term and any required reporting or other conditions. The accreditation term, required reporting and any other conditions must be consistent with the Appeals Panel's written rationale.

The chair of the Appeals Panel will send notification, including specific findings, of the Panel's decision to the Council within 21 business days of the hearing. The Council will notify the school or program and the chief executive of the institution housing the school or program of the Appeal Panel's decision within 24 hours of its receipt.

If the only deficiency cited in support of a final adverse action or conferral of probationary accreditation is the school or program's failure to meet the CEPH criterion relating to finances, the school or program may seek the review of new financial information before the Council returns a final decision if and only if 1) the financial information was unavailable to the school or program until after the decision subject to appeal was made and 2) the financial information is significant and bears materially on the financial deficiencies identified by the agency. The Council will determine whether the criteria of "significance" and "materiality" in item 2, above, are met. The Council's decision regarding "significance" and "materiality" is not separately appealable.

If the Appeals Panel upholds denial or revocation of accreditation, the name of the school or program will be removed from the list of accredited schools and programs and notification of the removal will appear on CEPH's website. The USDE, appropriate state agencies and appropriate accrediting agencies will be notified immediately. If the panel upholds probationary accreditation, the school or program will remain on the accredited list, but notification of the probationary status will appear on CEPH's website and the school or program must proceed with its accreditation review at the time originally stipulated by CEPH. Failure to do so will result in revocation of accreditation.

The school or program shall be responsible for the cost of the appeal as set forth in CEPH's fee schedule. The appeal fee shall be due at the time the school or program files its notice of appeal.

The school or program may terminate the appeal in writing at any time up until the decision of the Appeals Panel is rendered. In so doing, the school or program foregoes any right to reassert the appeal at a later date. If the school or program terminates the appeal, the school or program will remain responsible for any costs of the appeal incurred up to that point. Any remaining portion of the appeal fee shall then be refunded to the school or program. The action of the Council becomes final upon receipt of a written request to withdraw the appeal.

In addition to the foregoing appeal procedures, the CEPH staff shall assume certain responsibilities related to the appeal hearing. Those responsibilities are set forth in a separate document, "Council on Education for Public Health – Staff Responsibilities During Appeals Proceedings." This document is posted on the Council's website and shall be provided to any school or program that initiates an appeal.

Complaints

The Council is concerned about sustained quality of the schools and programs it accredits. CEPH requires that schools and programs maintain a record of written student complaints and make that information available to CEPH on request. Although CEPH is not a mediator of disputes within an institution, it will receive written and signed complaints against a school or program that relate to CEPH accreditation standards that might affect the accreditation status of a school or program. A complainant must have exhausted all administrative processes within an institution before filing a complaint with the Council.

When a complaint is filed with CEPH, the following procedures will apply. A complaint against an accredited school or program must be in writing, must be specific as to the accreditation standard that is being violated, must identify the outcome sought, must include documentation that appropriate administrative processes have been exhausted and must be signed. Complaints against accredited schools or programs may be submitted to CEPH offices at any time and are maintained on file for three years.

In the absence of documentation that administrative processes have been exhausted or in the event the complainant has failed to be specific, the following will occur:

- 1. CEPH staff will acknowledge receipt of the complaint within 15 days and advise that no subsequent actions are planned.
- 2. Copies of all materials received will be sent within 30 days of receipt of the complaint to the school or program against which the complaint has been made.
- 3. No further action will be taken.

Even though a complaint may not lead to formal action, the Council will maintain a record of written and signed complaints for three years.

If the complaint is specific and includes documentation that administrative processes have been fully pursued, the following steps will be taken by CEPH:

1. CEPH staff will acknowledge receipt of the complaint within 15 days and provide information about subsequent actions to be taken.

- 2. Copies of all materials received will be sent to the school or program within 30 days of receipt of the complaint, along with a request for verification that administrative remedies have been exhausted.
- 3. If the school or program acknowledges that the complainant has exhausted the administrative remedies at the institution, CEPH staff, at the time it forwards the complaint to the school or program, will request that a written response to the complaint be submitted by the dean or program director within 30 days of receiving copies of the complaint materials.
- 4. CEPH's Administrative Committee, which meets at least once per year but which will meet by special telephone conference call within 15 days of receiving the response of the school or program for purposes of reviewing a complaint, will review the materials submitted by the complainant and the responses submitted by the school or program and will determine whether there is sufficient evidence to believe the school or program is in violation of CEPH's accreditation criteria...
- 5. If the Administrative Committee determines that the complaint lacks sufficient evidence to proceed with an investigation, the complainant and the school or program will be so notified in writing within 15 days of the Administrative Committee decision.
- 6. If the complaint appears valid, the Administrative Committee will appoint a three-member investigative panel. The investigation shall begin within 30 days of the establishment of the panel. The panel's investigation of the complaint may include a visit to the school or program, but in any event, both the complainant and the school or program representative will be offered an opportunity to appear before the panel. It is expected that the panel shall have access to any and all information that is pertinent to the investigation.
- 7. The investigative panel will report its findings, along with its recommendation, to the CEPH Board of Councilors at its next regularly scheduled meeting. The board shall be the final decision-making body. Based on these deliberations, or in the event a school or program fails to permit an investigation on a timely basis, CEPH's decisions may include any of the following:
 - a. continue the accreditation status of the school or program without change,
 - b. continue the accreditation status of the school or program, but initiate an earlier review of the school or program,
 - c. place an accredited school or program on probation, or
 - d. revoke the school or program's accreditation.
- 8. The school or program and the complainant will be advised of the Council's decision and the reasons for the decision within 30 days.

The school or program may appeal a board decision. The appeals procedures described elsewhere in this document shall apply, except that if accreditation is revoked and no appeal is made, a new request for review for accreditation will not be entertained until one year from the date of revocation.

Complaints about CEPH's performance related to its own procedures, policies or criteria or about agency conduct inconsistent with good accreditation practices, as defined in its adopted code of good practice, may be forwarded to CEPH's offices. Complaints must be in writing, must be specific and must be signed by the complainant. CEPH staff will seek to achieve an equitable, fair and timely resolution of the matter. If staff negotiations are unsuccessful, the complaint will be referred to the

CEPH Administrative Committee at its next regular meeting. The decision of the Administrative Committee will be communicated to the complainant in writing within 30 days of the meeting of the Administrative Committee.

If the complainant is not satisfied with the resolution determined by the Administrative Committee, CEPH will provide the complainant with the name and address of the appropriate office within USDE and of any other recognition bodies to which the Council may subscribe. As a matter of policy, CEPH maintains complete and accurate records of complaints, if any, against itself and makes those available for inspection on request at CEPH offices.

Costs for complaint investigations shall be shared as follows: all costs of the complainant to participate in the process shall be borne by the complainant; all costs for the school or program representatives to participate in the complaint deliberations shall be borne by the school or program; and all costs for the three-member investigative panel shall be borne by CEPH. If an earlier full review is scheduled as a result of a complaint investigation, costs to the school or program shall include all expenses normally associated with an accreditation review.

Evaluation of Review Process

Site Team Member Assessment

After completion of a site visit, each member of the site visit team is sent a questionnaire for evaluating CEPH's review process. The team members are asked to complete the form and return their responses to CEPH offices. Site team members, excluding the chair, additionally are asked to evaluate the effectiveness of the chair. Results of these assessments are summarized regularly and are used in revision of CEPH accreditation procedures and criteria, in preparation of the site visitor and site visit chair training programs and in the appointment of site visit teams.

School or Program Assessment

After a review is complete and notification of the decision transmitted, a copy of CEPH's evaluation questionnaire is sent electronically to the school dean or program director. Comments and recommendations from the school or program evaluations are used in periodic revisions of CEPH criteria and procedures and in improving training programs.

Review and Revision of Criteria or Procedures

The Council periodically reviews and revises the criteria by which it evaluates schools and programs for accreditation and the procedures by which it carries out this responsibility. Whenever substantive changes are considered, these are agreed to in principle by the CEPH governing body and made available for review and comment by potentially affected parties for a period of at least 60 days before final adoption. Unless a specific implementation date is specified at the time of adoption by the CEPH Board of Councilors, the revisions become effective in the fall of the following academic year.