

PRESIDENT'S MESSAGE

ANGELA LOAVENBRUCK

On December 2, 2002, the Council on Academic Accreditation (CAA) of the American Speech-Language and Hearing Association (ASHA) had a hearing before the National Advisory Committee on Institutional Quality and Integrity (NACIQI). This committee is part of the US Department of Education's Office of Postsecondary Education, and is responsible for granting recognition or continued recognition to accrediting agencies. ASHA's CAA is currently the only accrediting body for graduate programs in audiology and speech-language pathology, and has been recognized by the Department of Education (DOE) since 1967. Recognition of an accrediting body by the DOE is required to permit students in accredited programs to receive certain federal funds.

Recognition is generally granted for a five-year period. Notice of the hearing appeared in the Federal Register in July and public comments were invited. On behalf of the American Academy of Audiology and the Academy of Dispensing Audiologists Bob Manning and I submitted written comments requesting that the DOE deny ASHA's request for continued recognition until a number of concerns about the CAA standards were addressed. We also requested the opportunity to present oral testimony at the open public hearing on December 2, 2002. It is important to note that comments can only be made concerning whether or not the standards submitted by the accreditation agency meet DOE requirements. The DOE will not consider issues outside of its specific regulations.

Our comments centered around two major issues: (1) that there was an inherent conflict of interest in all of CAA's accreditation requirements relating to the ASHA Certificate of Clinical Competence (CCC), including the requirement that all supervisors have ASHA certification, and requiring programs to list the current ASHA membership numbers of faculty, staff and supervisory personnel in the community, and requiring programs to fill out sample ASHA certification applications to document that their curriculum fits ASHA's CCC requirements; and, (2) that ASHA was using master's degree level standards to accredit doctoral degree programs with no differentiation between doctoral and master's degree graduate programs. We tried to tie these concerns to specific DOE regulations for accrediting bodies.

In the initial written review of ASHA's application by DOE staff, the readers commented that ASHA's application adequately met DOE requirements except for the use of master's degree



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standards for doctoral degree programs. While staff recommended that ASHA be granted continued recognition, they stipulated that by December 2003, CAA/ASHA must develop and submit to DOE new standards that more specifically delineate the requirements for master's vs. doctoral graduate education programs.

At the open public hearing, DOE staff presented its summary and recommendations. ASHA and CAA staff then presented their oral testimony and responded to the recommendations of the staff by saying that they already had several different requirements for doctoral programs, mainly

centered around requiring that the program meet all state requirements for a new doctoral program, and stated that they would comply by developing additional standards for doctoral programs by December 2003.

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The American Academy of Audiology presented oral testimony which can be found on our website www.audiology.org. Our testimony elaborated on the lack of validity in requiring supervisors to hold the CCC, as well as the inappropriateness of an accrediting body creating standards that serve to funnel students into purchasing a product sold by its host organization. In response to a question about the requirement of the CCCs by a member of the DOE committee, Earl Seaver, Chair of the CAA, responded that the CCCs are not required of every supervisor and that students are not required to apply for the CCCs in order for a program to be accredited by the CAA. Seaver stated that CAA wants to make sure that programs' curriculum and practicum make it possible for students to apply for the CCCs if they wish, just as they want programs to make it possible for students to apply for teacher certification, if they wish. Seaver insisted that many supervisors do not have ASHA CCCs and this does not prevent a program from being accredited.

I questioned Seaver's characterization of CAA requirements for supervisory staff.

Universities and supervisors most certainly believe that ASHA certification is required and that accreditation depends on this. As part of the accreditation application, programs are asked to submit the current ASHA membership numbers of their supervisory personnel both on and off campus. Programs must


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document that their curriculum exactly matches the ASHA CCC requirements, and students are led to believe that applying for the CCCs is required for graduation and in order to practice audiology.

The DOE committee members closely questioned the ASHA/CAA representatives about these issues. Several witnesses expressed their dismay and concern about the CAA requirements for the CCCs, stating that they were "offended" by accreditation policies that essentially existed to create a monopoly for ASHA and to funnel millions of dollars into ASHA's budget. One DOE committee member stated that this "was not a road we want to go down in this country," where professional organizations unfairly try to prevent qualified people from practicing the profession. After questioning Patricia Tice, ASHA's Director of Credentialing, about the requirements for reinstating the CCCs if an audiologist had allowed them to "lapse", another DOE committee member astutely noted that the only difference in the audiologist during the lapsed period and after reinstatement was that money had been paid to ASHA to reinstate. There was absolutely no difference in the qualifications of the audiologist.

Several DOE committee members stated that the CAA policy appeared to be an anti-trust matter and urged the American Academy of Audiology to pursue this issue with the appropriate federal agency. DOE committee members expressed regret that, strictly speaking, the DOE regulations did not permit them to

prevent ASHA/CAA from using these criteria. Seaver was asked whether the CAA was "wedded to this requirement for the CCC," and he answered that at the moment the requirement was part of the standard, but that all of the standards were going to be reviewed in the spring of 2003. The DOE committee told Seaver that it hoped he was noting the extraordinary concern that the committee had about these CCC requirements. The DOE group also suggested that one method of redress would be to start our own accrediting agency. They noted that Congress had passed legislation that permitted "more than one authoritative voice" in a profession. The DOE committee, in fact, voted to continue CAA/ASHA recognition as an accrediting body with several members commenting that they were voting in favor of ASHA's application only because of the narrow scope of their power in this instance.

In summary, ASHA must return to the DOE with revised standards for doctoral programs by December 2, 2003. The American Academy of Audiology will certainly be preparing our input when CAA reconsiders its standards this spring, and we will present the results of our efforts to the DOE at the December 2003 public hearing. The response of this DOE committee to our concerns is encouraging, and we hope that our efforts on behalf of all audiologists will result in meaningful change to the CAA standards. We will also continue to pursue our own audiology standards setting and accrediting bodies. 

ACADEMY ELECTION 2003

The 2003 election of The Academy's President-Elect and three Members-At-Large of the Board of Directors will be held January 21 through February 20, 2003. In accordance with Academy By-Laws, only Fellow Members of The Academy — Life, Retired, Disabled, Family Leave and International Fellow members — may vote.

Eligible members with e-mail will receive an e-mail notice inviting them to vote online by visiting The Academy web site at www.audiology.org

Eligible members without e-mail will receive a paper ballot in the mail so that they can vote and return their vote postmarked **no later than February 20, 2003.**

Biographies of the candidates for the office of President and Board Members-at-Large are available in the November-December issue of *Audiology Today* (14:6, 2002) and online at www.audiology.org.

Eligible members not contacted by e-mail or post by January 24, 2003 are requested to call the Membership Department at 800-222-2336, or e-mail ssebastian@audiology.org to verify eligibility and receive instructions on how to vote.