

FRAMEWORK FOR DEVELOPMENT OF A SINGLE ACCREDITING BODY FOR AUDIOLOGY

*Response by the American Academy of Audiology Board of Directors
August 1, 2007*

The Board appreciates the opportunity to comment on the draft white paper on this important topic.

The American Academy of Audiology supports the concept of two separate accrediting bodies for audiology and speech pathology. These accrediting bodies must function independently but work collaboratively under the name "Council on Academic Accreditation" or CAA.

The issues brought forth in this white paper should be addressed specifically once the decision to institute the collaboration has been made. The Academy will endeavor to work closely with all interested parties in order to establish an alliance to further elevate accreditation of doctoral audiology programs.

The Academy has reviewed all issues listed under the three elements described below and can forward suggestions, thoughts and ideas once the collaboration is established.

The Academy appreciates and acknowledges the group effort addressed in this white paper and looks forward to the development of a strong and collegial partnership in the area of accreditation.

Interspersed below are the initial comments and impressions to the questions posed in the original white paper (**bolded**). A face-to-face discussion is necessary in order that all parties have a clear understanding of the roles, responsibilities and possible pitfalls of the arrangement. Critically important to the success of this endeavor is an agreement by all parties to negotiate, discuss and compromise in good faith.

Element 1: Modification of the Structure of the CAA

*Issue: Are these entities actually separate if joined under the CAA banner, particularly as related to recognition by the ED or CHEA? **This question needs to be addressed with the United States Department of Education.***

*Issue: Would the ED recognize separate entities under the CAA banner? **See above***

*Issue: ED and CHEA requirements must be satisfied and the recognition process could be lengthy. Audiology accreditation can go forward without USDE and CHEA recognition. **This is a topic for future, joint discussion to resolve.***

*Issue: Should the entry-level graduate degree be restricted to the AuD or would other doctoral designators be acceptable? **The AuD, as the designator of the practice of Audiology, is the sole entry-level graduate degree. Should a University offer a different degree, a determination would need to be made collaboratively as to whether, and how, to accredit.***

*Issue: The cost of developing the new two-division CAA and the ongoing costs of the CAA must be determined as closely as possible so that the participating organizations and the accredited programs will have a full understanding of their likely financial commitment when they consider the proposed merger. **Agreed. Both organizations must submit current and proposed budgets. It might be helpful to appoint a budget manager from outside the participating organizations.***

Element 2: Relationship of New Accrediting Agency to Professional Organizations

*Issue: What role, if any, should the ADA or other so-called “niche” organizations play in the new accrediting body? **The accreditation team should comprise an equal number of representatives from AAA, ACAE, ASHA and CAA only.***

*Issue: How many individuals should be on the new accrediting board? How should the individuals be selected? **There should be equal representation from CAA, ACAE, AAA and ASHA.***

*Issue: Is representation on the board tied to financial support of the professional organizations? **NO.** Should CAPCSD be required to financially support the new accrediting body if they desire representation on the board? **This is a topic for discussion with all involved parties.***

The following representation (in addition to the ex officios and a public member) was proposed in an early meeting and is not considered to be part of the current proposal but is presented as an example of representation:

- CAPCSD will select 2 academic members (**current affiliation with a university program**) to serve on the Audiology Division of the CAA.
 - ASHA will select 2 academic members and 2 practitioner members (**currently providing clinical services**) to serve on the Audiology Division of the CAA.
 - AAA will select 2 academic and 2 practitioner members to serve on the Audiology Division of the CAA
- Academic representatives to the Audiology Division must be from **accredited** audiology programs.

*Issue: Should all representatives, except the public member(s), be audiologists? **Yes.** Should all academic representatives be from academic programs offering the AuD degree? **Yes.***

Element #3: Merger of Accreditation Processes and Standards of CAA and ACAE

*Issue: The required peer review to develop new/merged standards is a lengthy process, governed by many regulations. Current CAA and ACAE accreditation processes must continue as planning for the new process moves forward. **Agreed***

*Issue: Financial considerations, including those pertaining to ACAE and ASHA investments in technology and software to date, will be important elements to be considered in determining the feasibility of the merger. Both groups have invested significantly in the development of the accreditation process. Is there a willingness to further invest to merge the processes? **Yes***

*Issue: Merger of the accreditation processes would be time consuming and lengthy. Cost estimates for this process would need to be developed. **See above***

*Issue: CAA and ASHA have invested in the Higher Education Database System (HES). ACAE and AAA have invested in the CAP (Computerized Accreditation Program). What would be the costs, both actual and potential, to have the CAP adopted as the basis for the accreditation process? **Estimated costs must be determined based on information and data not currently available to the Academy Board.***

*Issue: Would AAA require financial compensation for the CAP? Would ASHA require financial compensation for the HES? **To be determined based on discussions and data from both organizations.***

- The Speech-Language Pathology Division may seek to acquire the Computerized Accreditation Program as the basis for the accreditation process of programs in speech-language pathology. The process would have to be adapted to meet the standards of the Speech-Language Pathology Division.

*Issue: Would adoption of the CAP program by the reorganized CAA necessitate the Speech Language Pathology Division also adopting this method? **CAPCSD speech representatives would need to make this determination.** Would having two different systems be a burden to academic programs? **This can only be determined by CAPCSD.***

*Issue: The CAP was developed for audiology programs. The CAP would have to be revised for Speech Language Pathology programs. What are the costs associated with such a revision? Would the re-organized CAA be willing and/or able to invest in the system? (This assumes that audiology, via AAA, would not be an investment partner in this regard.) **This would be up to CAA/SLP.***

*Issue: During the transition period, the ongoing work of the CAA and the ACAE will need to continue, and there will be new expenses associated with the transition. How will those additional transition costs be covered? **These expenses should be equally shared by both organizations.***

*Issue: The amount of financial support provided by each organization must be determined. The relationship of this financial support to participation in other aspects of the process (e.g., board representation) will require discussion. **Yes***

*Issue: Should each organization support the expenses of their respective members of the Audiology Division of the CAA as they carry out their duties? **The expenses should be equally borne.***

*Issue: How can we ensure that financial contribution is not tied to influence in the accreditation process? **An independent budget manager/ auditor should be retained in order to oversee financial contributions from each organization and to ensure that monies contributed are expended in a way that meets the requirements and obligations of all stakeholders.***

Issue: Current accreditation standards by either CAA or ACAE do not reference certification standards; however, the certification entities of ASHA and AAA could be required to remove any language that impose additional academic standards over and above those of the reorganized CAA. Agreed. Further, the requirement that programs provide supervision by audiologists with their Certificate of Clinical Competence (CCC's) must be eliminated; students wishing to obtain their CCC's should qualify based on graduation from an accredited program, regardless of whether clinical hours were supervised by a certified audiologist.
