

The National Commission on Orthotic and Prosthetic Education

ACCREDITATION MANUAL



This manual contains policies, procedures and forms related to the NCOPE review process. For applications for accreditation, it should be used in conjunction with the Guidelines for the Self-Study Process. Information in these documents is accurate as of 1/28/04. If substantive changes occur before the next edition, program administrators will be notified.

The National Commission on Orthotic and Prosthetic Education
330 John Carlyle St., Suite 200
Alexandria, Virginia 22314
(703) 836-7114
fax (703) 836-0838
info@ncope.org
www.ncope.org

TABLE OF CONTENTS

I. Introduction	4
II. Description of the Process	
A. The Initial Review	8
1. The Letter of Intent	10
2. The Initial Application/Self-Study Report	11
3. The Letter of Review Process	12
4. The Initial On-Site Evaluation	15
5. Accreditation Action	16
B. Continuing Accreditation	16
1. The Application/Self-Study Report	18
2. The On-Site Evaluation	18
3. Accreditation Actions	27
4. Maintaining Accreditation	27
C. Additions or Changes	28
1. The Letter of Intent	28
2. Application and Required Documentation	29
3. The Review Process	29
D. Classification of Accreditation Categories	30
1. Accreditation Categories	31
2. Non-Accreditation Categories	33
E. Reconsideration/Appeals Process	35
F. Additional Reports	41
1. Plans of Correction	41
2. Progress Reports	41
3. Annual Reports	42
4. Program Director Changes	43

III. Administrative Procedures

A. Fees 44

B. Procedures for Complaints 45

C. Policy and Procedure for Delay of On-Site Evaluation 47

D. Failure to Submit Reports 48

IV. Guidelines and Policy Statements

A. Guidelines for Communication with Educational Program
and Institutional Representative 49

B. Policy on Disclosure and Confidentiality... 49

C. Statement of Ethical Responsibilities and Conflict
of Interest Guidelines 51

D. Inactive Status 53

E. Sample Statements Regarding Accreditation Status 54

V. Forms

- A. Practitioner Report of On-Site Evaluation
- B. Plan of Correction Format
- C. Progress Report Format
- D. O&P Practitioner Annual Report to NCOPE
- E. Summary of Program Director Credentials
- F. Application for Accreditation of an Addition or Change in an
O&P Practitioner Educational Program.

VI. Appendices

- A. 2001 Standards
- B. Self-Study Guide

I. INTRODUCTION

Accreditation

Accreditation is a system for recognizing educational institutions and professional programs affiliated with those institutions for a level of performance, integrity and quality which entitles them to the confidence of the educational community and the public they serve. In the United States this recognition is extended primarily through nongovernmental, voluntary institutional or professional associations. These groups establish criteria for accreditation, arrange site visits, evaluate those institutions and professional programs that desire accredited status, and publicly designate those that meet their criteria.

The system of voluntary non-governmental evaluation, called accreditation, has evolved to promote both regional and national approaches to the determination of educational quality. Although accreditation is basically a private, voluntary process, accrediting decisions are used as a consideration in many formal actions - by governmental funding agencies, scholarship commissions, foundations, employers, counselors and potential students. Accrediting bodies have, therefore, come to be viewed as quasi-public entities with certain responsibilities to the many groups which interact with the educational community.

In America, accreditation at the postsecondary level performs a number of important functions, including the encouragement of efforts toward maximum educational effectiveness. The accrediting process requires institutions and programs to examine their goals, activities and achievements; to consider the expert criticism and suggestions of a visiting team; and to determine internal procedures for action on recommendations from the accrediting body. Since accreditation status is reviewed on a periodic basis, recognized institutions and professional programs are encouraged to maintain continuous self-study and improvement mechanisms.

Accreditation's Purposes

Throughout the evolution of its procedures, the aims of postsecondary accreditation have been and are to:

- o Foster excellence in postsecondary education through the development of criteria and guidelines for assessing educational effectiveness
- o Encourage improvement through continuous self-study and review
- o Assure the educational community, the public, and other agencies or organizations that an institution or program has clearly defined and appropriate objectives and maintains conditions under which their achievement can reasonably be expected to continue
- o Provide counsel and assistance to established and developing institutions and programs
- o Endeavor to protect institutions against encroachments which might jeopardize their educational effectiveness or academic freedom (Directory of Recognized Accrediting Bodies, August 1990)

By stating that an institution has met established standards, accreditation provides benefits to:

Public

- a. An assurance of external evaluation of the institution or program, and a finding that there is conformity to general expectations in higher education or the professional field;
- b. An identification of institutions and programs that have voluntarily undertaken explicit activities directed at improving the quality of the institution and its professional programs, and are carrying them out successfully;
- c. An improvement in the professional services available to the public, as accredited programs modify their requirements to reflect changes in knowledge and practice generally accepted in the field;
- d. A decreased need for intervention by public agencies in the operations of educational institutions since through accreditation, their institutions are providing privately for the maintenance and enhancement of educational quality.

Students

- a. An assurance that the educational activities of an accredited institution or program have been found to be satisfactory, and therefore meet the needs of students;
- b. Assistance in the transfer of credits between institutions, or in the admission of students to advanced degrees through the general acceptance of credits among accredited institutions when the performance of the student has been satisfactory and the credits to be transferred are appropriate to the receiving institution;
- c. A prerequisite in many cases for entering a profession.

Professions

- a. Providing a means for the participation of practitioners in setting the requirements for preparation to enter the profession;
- b. Contributing to the unity of the professions by bringing together practitioners, teachers and students in an activity directed at improving professional preparation and professional practice. (CORPA Policy Statement on The Role and Value of Accreditation, 1982)

The specific purposes of the National Commission on Orthotic and Prosthetic Education (NCOPE) accreditation process and Commission on Accreditation of Allied Health Education Program (CAAHEP) are:

1. To encourage continuous self-analysis and improvement of the orthotic and prosthetic program by representatives of the institution's administrative staff, teaching faculty, students, governing body and other appropriate constituencies, with the ultimate aim of assuring students of quality education in this profession and ensuring patients of appropriate orthotic and prosthetic care.
2. To determine whether the orthotic and/or prosthetic educational practitioner program meets the appropriate approved educational standards.
3. To encourage faculty to anticipate and accommodate new trends and developments in the practice of orthotics and prosthetics that should be incorporated into the educational process.

History of O&P Accreditation

The American Orthotic and Prosthetic Association (AOPA), founded in 1917, in conjunction with the American Academy of Orthopedic Surgeons, sponsored the creation of the American Board for Certification in Orthotics and Prosthetics, Inc. (ABC) in 1948. The Board was created for the purposes of establishing and maintaining standards for the practice of orthotics and prosthetics.

In 1972 the Educational Accreditation Commission (EAC) was created by ABC. The Commission was established to conform to ABC's need for an institutional accreditation program. A consensus was reached that this would be a useful process for providing guidance to existing schools as well as to new educational institutions that might seek to participate in the training of orthotists and prosthetists. Basic educational standards were developed, and the process of self accreditation was implemented.

The accreditation process continued under the auspices of ABC until 1988, when AOPA, ABC and the American Academy of Orthotists and Prosthetists (the Academy) funded the operations of the EAC equally.

In the spring of 1990, a Task Force was established to review the professions' current educational and accreditation systems. In March 1991 the Task Force report was presented to the respective organizations (AOPA, ABC and the Academy) and out of the report came the recommendation that the EAC should be a separate reorganized body with their own administrative bylaws.

In July of 1991, the new Commission met and renamed the organization the National Commission on Orthotic and Prosthetic Education (NCOPE).

The current Commission is composed with representation as follows:

- 1) Six representatives from the National Office
- 2) Three representatives from National Association of Orthotic and Prosthetic Educators (NAPOE)
- 3) One public member

Review of Accreditation Policies

NCOPE periodically reviews its policies and procedures to ensure that:

- o They are consistent with the recommendations of CAAHEP and the United States Department of Education (USDE),
- o They facilitate an impartial and objective judgment of each program's compliance with the *Standards*,
- o They ensure due process, and
- o They minimize, as much as possible, the burden of the documentation required.

Procedures in Accreditation

The accreditation process is continuously evolving. The trend has been from quantitative to qualitative criteria, from the early days of simple checklists to an increasing interest and emphasis on measuring the outcomes of educational experiences.

The process is as follows:

- *1) The Letter of Intent
- **2) Self-Study Report
- 3) Report reviewed by evaluators
- 4) Trained evaluators conduct an on-site visit
- 5) Evaluator team prepares an evaluation report, which is reviewed by the program for factual accuracy
- 6) The Commission reviews all reports to make determination of an accreditation recommendation to CAAHEP.

Established programs are re-evaluated for continuing accreditation every five years. In addition, all programs must submit an Annual Report and any required progress reports to NCOPE. (See **Section III. F**)

* = applies to programs seeking initial accreditation or additions and/or changes to a currently accredited program

** = Guide to the Self-Study Report is a companion to this manual and provides guidelines for conducting the self-study and preparing a report

Listing of Educational Programs

NCOPE publishes annually a list of accredited orthotic and prosthetic educational programs, which includes a section devoted to developing programs that have entered the accreditation process and sections devoted to programs that have voluntarily or involuntarily withdrawn from the accreditation process. The fact that the program is included as an accredited educational program in the listing indicates that it is in substantial compliance with the *Standards* and thus meets a common minimal level of quality. It should not be construed as indicating the rank or degree to which the programs exceed the standards.

II. DESCRIPTION OF THE PROCESS

II.A. The Initial Review

Development of a New Program

NCOPE should be notified when consideration is being given by an institution to the development of an orthotic and/or prosthetic practitioner educational program. This enables NCOPE to provide guidance and assistance and to ensure that the steps leading to accreditation are initiated in a timely manner. Suggested resources from NCOPE include the following:

- o *NCOPE Staff*

Information and guidance regarding the accreditation process are available from the staff of NCOPE. Any questions regarding the policies and procedures described in this manual should be referred to that office.

Overview of the Accreditation Process for a New Orthotic and/or Prosthetic Practitioner Educational Program

Because graduation from an accredited educational program is a requirement of eligibility for certification by ABC, effort is made to ensure that the accreditation process is complete prior to the graduation of the first class of students. It is critical that an orthotic and/or prosthetic practitioner program director be on staff at least six months prior to the initiation of an orthotic and/or prosthetic program and the admission of students to ensure a timely progression of the process.

The following provides a general framework for the accreditation process for new orthotic and/or prosthetic educational programs in institutions that follow a September through May academic pattern. It is expected that the proposed curriculum will be approved by the appropriate state and institutional bodies before an initial evaluation is conducted by NCOPE.

Details regarding each step are provided in the sections which follow. Since the target dates listed below do not apply universally to all developing programs, an individual scheme is prepared by the NCOPE staff for each developing program.

- March** When an orthotic and/or prosthetic practitioner program director has been hired, a Letter of Intent should be submitted, addressed to the Executive Director, NCOPE. This letter declares the intention of the institution to seek accreditation for the orthotic and prosthetic program and requests an initial review. (See Section III.A.1.) Appropriate forms and information concerning the review will then be forwarded to the program director. The program director compiles all materials to be submitted for initial review of the Self-Study Report.
- January** Self-Study materials are received by the designated individuals and by the NCOPE staff. A subcommittee of NCOPE reviews all materials and presents recommendations to the Commission at its next scheduled meeting.
- April** The director and/or other representative of the program being reviewed are invited to meet with the Commission for discussion of the program. This review is conducted frequently at the NCOPE meeting in conjunction with the AOPA and/or Academy Annual Meetings.
- Following initial review of materials, NCOPE takes action on the Letter of Review (See Section II.A.3.)
- A statement of the action taken by NCOPE is forwarded to the chief executive officer of the sponsoring institution with a copy to the dean, program director. Any recommendations for improvement of the program are stated in the enclosed Report of Initial Review. NCOPE staff arranges with the program director an appropriate date for the required on-site evaluation.
- August** In preparation for the on-site evaluation, the program director supplies an update of any information previously provided for initial review. Additional materials needed to supplement the Initial Self-Study Report are requested in the Report of Initial Review. All updated materials are sent directly to the NCOPE reviewers and evaluators and to the NCOPE staff at least two months prior to the date of on-site evaluation.
- October** The date of the 1 1/2 day on-site evaluation depends on the institution's system relative to quarters, trimesters, semesters, etc., and the time when students are assigned for clinical experience. At the conclusion of the on-site evaluation, the chief executive officer receives a copy of the unofficial Report of On-Site Evaluation that summarized by the evaluation team at the final on-site conference. Comments relative to accuracy are returned with this report to NCOPE staff for sharing with the Commission prior to action by NCOPE.
- December** The subcommittee of NCOPE considers all relevant materials regarding the Report of On-Site Evaluation and makes recommendations for action to NCOPE.
- February** NCOPE recommends an appropriate accreditation status to CAAHEP or takes other action as may be deemed necessary and the appropriate officials at the institution are notified.
- April** CAAHEP reviews and acts upon NCOPE's recommendation and appropriate officials at the institution are notified.

Withdrawal of Request For Initial Accreditation

An institution may withdraw its request for initial accreditation of an orthotic and/or prosthetic educational program at any time prior to final action by CAAHEP. The request for withdrawal should be in writing and signed by the appropriate institution officials, including the orthotic and/or prosthetic director, and sent to the Chair of NCOPE or CAAHEP.

II.A.1. The Letter of Intent

Letter of Intent

To initiate the accreditation process, a Letter of Intent should be submitted to NCOPE three to six months prior to admission of students into the program. The Letter of Intent must be signed by the chief executive officer of the institution and the orthotic and/or prosthetic program director and must include the following:

- o A declaration of the intention of the institution to seek accreditation for the orthotic and/or prosthetic educational program.
- o A request for initial review of the Self-Study Report.
- o The type of the program (i.e., practitioner or technician).
- o The level of the program (i.e., baccalaureate degree, post-baccalaureate certificate, or professional master's degree).
- o The month and year the first class will enter the program.
- o The month and year the first class will graduate.
- o Projected date the first students will sit for the ABC certification examination.

The Letter of Intent should be addressed to the:

Executive Director
National Commission on Orthotic and Prosthetic Education
330 John Carlyle St, Suite 200
Alexandria, Virginia 22314

Upon receipt of the Letter of Intent, the NCOPE staff will establish and forward a time line for the accreditation process. In addition, the program becomes officially listed as a developing program in the O&P Almanac, recruitment brochures, etc.

II. A.2. The Initial Application/Self-Study Report

The Initial Application/Self-Study Report

In preparing materials for application for initial review, the program director should use the Guidelines for the Self-Study Process. Although it is understood that all aspects of the program may not be in place at the time of the initial review, information provided should be as complete as possible.

If the budget for the next fiscal year has not been appropriated at the time the initial Self-Study Report is prepared, proposed budgetary figures should be submitted.

If the current catalog does not contain a description of the program, including the course of study and course descriptions, a copy of what has been proposed for the catalog should be submitted. Documentation should include the date that the information will be included in the catalog and should describe the current method of disseminating the information.

The curriculum design and sequencing should be complete and course syllabi, including objectives, a topical outline, teaching/learning experiences and evaluation methods, and an estimate in percentage of each subject taught in each of the courses, must be provided for all courses. **(See FORM A-8 and B-8 in the Guidelines for the Self-Study Process.)**

Although no outcome data will be available at the time of the initial application, a full plan for program evaluation, including an assessment of outcomes, should be included.

Five (5) copies of the Application for Initial Accreditation and the accompanying Self-Study Report should be prepared and submitted. All copies are submitted to the NCOPE National Office.

II.A.3. The Letter of Review Process

Initial Review Process for Developing Educational Programs

The Letter of Review is used by the NCOPE as a mechanism for providing feedback to a developing program prior to the initial on-site evaluation. The granting of a Letter of Review indicates that, on the basis of examination of the Initial Self-Study Report and supplementary information available to the review committee, NCOPE has determined that the program is likely to meet the *Standards and Guidelines for an Accredited Educational Program for the Orthotic and Prosthetic Practitioner* if implemented fully in accordance with its plans. This shall not be regarded as a form of preaccreditation status, but is intended to provide an indication that program planning appears to be proceeding in a direction that will lead toward NCOPE Accreditation.

The Initial Review

The four reviewers assigned to the self study review committee review the materials sent from the program director. Then they each submit a comprehensive evaluation of the program materials, and a summary report is prepared by the review committee chairman for presentation to NCOPE.

After the review is complete by the committee one of the following may occur:

1. The program director (and, if desired, one or more other program representatives of the director's choice) may be invited to participate in the NCOPE meeting at which the initial review of the program takes place. During the meeting (prior to the arrival of the program director) the review committee chairman for the program presents a summary of the findings of the four reviewers to the Commission.

After preliminary discussion, the program representatives are invited to join the subgroup for approximately one hour. During this time, the reviewers and commission ask for further explanation of aspects of the Self-Study Report that may have been unclear and/or seek additional information in relation to areas of concern.

The program director is given the opportunity to elaborate on aspects of the Self-Study Report that may have been unclear and/or seek additional information in relation to areas of concern. The program director is given the opportunity to elaborate on aspects of the program that may have been difficult to portray in the report and to share any changes, concerns or positive developments that may have occurred since the report was submitted. Samples of the types of questions that reviewers may ask include:

- o Can you explain how funds are allocated in your division?
- o We are not clear on the rationale for the extra (Biology/Chemistry/Sociology) prerequisite. Could you explain how it contributes to the program? Does it seem to present a problem to incoming students?
- o From your document, we understand that classroom assignments are computer generated on a campus-wide basis. How does this work?
- o Would you explain the rationale for the sequence of courses in the context of your curriculum design?
- o What was the process that was used to develop your objectives?

- o Although you list many forms of evaluation within your program, there does not seem to be an overall plan. Would you address this?

Following this discussion, the program representatives are asked to leave. The commission then reviews and formulates the report and recommendation.

2. The review committee may also present their summary report to the commission. Upon commission discussion and review, a letter requesting further clarification from the program director on aspects of the program could be required prior to scheduling an on-site evaluation.

Commission Action on Initial Review

Following this initial review, one of the actions below is taken by NCOPE:

Developmental Accreditation Granted

The proposed program would appear to meet the *Standards* if fully implemented in accordance with the plans of the sponsoring institution. An on-site evaluation will be conducted before the first class completes the academic curriculum.

Developmental Accreditation Denied

One or more of the *Standards* are not met (e.g., faculty, budget, facilities, course content, etc.), and there does not appear to be evidence of the ability to comply within the immediate future.

Developmental Accreditation Deferred

Information received from applicant is incomplete and/or insufficient for evaluation.

Procedures Following Action on Initial Review

Following action by NCOPE relative to the developmental accreditation, the Chair of NCOPE sends the results of the review to the appropriate institutional official, with copies to the program director and the Dean. Included in this letter of notification is a copy of the Report of the Initial Review, which summarizes the strengths and limitations of the program.

A. If **Developmental Accreditation** has been **Granted**:

1. The NCOPE staff contacts the program director to schedule an on-site evaluation prior to graduation of the first class. This on-site evaluation must occur while students are still on campus. A reasonable effort is made in scheduling to allow for NCOPE action on the Report of On-Site Evaluation prior to the actual graduation date.
2. Procedures for on-site evaluation are followed according to those outlined in **Section II.B.2**.
3. The program has the option of submitting entirely new Self-Study materials for the on-site evaluation or updating the material under which Developmental Accreditation was granted. In preparing new/updated Self-Study materials, the program should be guided by the Report of Initial Review, as provided with the letter of notification

B. If **Developmental Accreditation** has been **Denied**:

1. No further action is taken by NCOPE unless the appropriate institutional official and the program director send a Letter of Intent to proceed with the accreditation process within 30 days of receipt of notification of denial.
2. At the end of the 30 days, if no request has been received from the program, the program is removed from the status of "developing program", and the accreditation process for that program is considered terminated.
3. The sponsoring institution is responsible for informing the students in the orthotic and/or prosthetic program that there is no assurance that the program will be accredited prior to their graduation. Because failure to receive accreditation would affect the students' eligibility to sit for the ABC certification examination, it is imperative the institution notify students of the options for protecting certification eligibility (e.g., transfer to an accredited program).
4. The institution retains the option of proceeding with the initial on-site evaluation. Should the institution choose to do so, the dates of the on-site evaluation are established as described above. New/updated Self-Study materials must be submitted. Procedures for on-site evaluation are followed according to those outlined in **Section II.B.2**.
5. The Developmental Accreditation process may be repeated. The program submits a Letter of Intent to re-enter the accreditation process, and a second initial application fee is charged. A due date for submission of new Self-Study materials would then be established by NCOPE staff. In preparing new Self-Study materials, the program should be guided by the report of Initial Review, as provided with the letter of notification.

NOTE: There is no guarantee that the accreditation process can be repeated in time to complete accreditation action prior to the graduation of the first class of students.

C. If Action has been Deferred on Developmental Accreditation:

1. The program receives, along with the notification of deferral, a list of concerns identified by the Committee in reaching its decision and a due date for submission of supplementary information that addresses the concerns.
2. The supplementary information is reviewed at the next meeting of NCOPE, at which time a decision is made to either grant or deny Developmental Accreditation. A program may have action on Developmental Accreditation deferred only once.
3. The sponsoring institution is responsible for informing the students in the orthotics and/or prosthetics practitioner program that there is no assurance that the program will be accredited prior to their graduation.

Because failure to receive accreditation would affect students' eligibility to sit for ABC's certification examination, it is imperative that the institution notify students of the options for protecting certification eligibility (e.g., transfer to an accredited program).

4. The institution retains the option of proceeding with the initial on-site evaluation. Should the institution choose to do so, the dates of the on-site evaluation are established as described above. New/updated Self-Study materials must be submitted. Procedures for on-site evaluation are followed according to those outlined in **Section II.B.2**.
5. If the program does not respond by the due date for submission of supplementary materials (See #1 above) or if Developmental Accreditation is denied following the second review, the program is removed from the status of "developing program" and the accreditation process for that program is considered terminated.

To repeat the Developmental Accreditation process, the program must submit a Letter of Intent as described in **Section II.A.1**.

II.A.4. The Initial On-Site Evaluation

The Initial On-Site Evaluation

The on-site evaluation visit for initial accreditation is conducted in the same manner as visits for continuing accreditation. A complete description of procedures related to the visit is provided in **Section II.B.2**.

II.A.5. Accreditation Actions

Accreditation Actions

Following NCOPE review of the Report of the Initial On-Site Evaluation, action is taken to recommend to CAAHEP Initial Accreditation, Continued Accreditation or Accreditation Withheld. (Descriptions of each accreditation status are provided in **Section II.D.**) Copies of the recommendation letter are sent to the chief executive officer, the dean and the program director. When accreditation is granted by CAAHEP a Certificate of Accreditation (if awarded) are mailed to the programs.

Procedures for request for reconsideration and appeal of Commission actions are found in **Section II.E.**

If deficiencies are identified in the Report of the Commission, a Plan of Correction and subsequent progress reports are required. (See **Sections II.F.1. and II.F.2.**)

Following action to award initial accreditation, the next on-site evaluation is generally scheduled after a period of five (5) years.

II.B. Continuing Accreditation

Once awarded, accreditation continues until a reevaluation results in its reaffirmation or until it is withdrawn at the request of the institution or by the NCOPE for cause. (See **Section II.D.**) Established orthotic and/or prosthetic educational programs are reevaluated on a five-year cycle. The program director is notified at least six months in advance of the on-site year and may request a time for the on-site within that year (e.g., late Fall, early Spring). The specific dates for the visit are set after the selection of the visiting team.

The Self-Study Process

At the heart of the continuing accreditation process is the self-study. Both CAAHEP and the USDE mandate inclusion of self-study as a requirement for accreditation. Self-study in this context refers to a formal process during which an educational program critically examines its structure and substance, judges the program's overall effectiveness relative to its mission, identifies specific strengths and deficiencies and indicates a plan for necessary modifications and improvements. The process should flow naturally out of the ongoing program evaluation. It should include a consideration of external factors influencing educational directions, as well as an assessment of the extent to which the program is in compliance with established accreditation standards.

NCOPE does not specify details regarding how the self-study process is to be conducted. However, it does have expectations that:

1. The self-study process precede the preparation of the report. Although the requirements of the final report should be considered in the plan for the study, the initial focus should be on the evaluative process, not on the document.
2. The self-study process should be comprehensive, examining in sufficient detail all aspects of the program, so that eventual assessment of compliance with the *Standards* can be accomplished.
3. The self-study process begins with a well-thought-out plan that includes:
 - a. objectives,
 - b. identification of resources,
 - c. individuals to be involved and delegation of responsibilities,
 - d. time line, and
 - e. reporting mechanisms.

The plan should address how existing information from ongoing evaluation will be included.

4. The self-study process is *evaluative* rather than *descriptive*. It should include comments, suggestions and recommendations on program change, particularly the resolution of current problems or weaknesses cited in the Self-Study Report. It should also offer predictions of future change.
5. The self-study process involves the entire faculty of the program. Although it is recognized that a small committee or a single individual is generally assigned responsibility for overseeing the process and the preparation of the report, it is expected that the process include input from all faculty and from administration, students and graduates.

Further guidelines are provided in the Guidelines for the Self-Study Process.

It is the self-study process from which many of the benefits of accreditation for the program derive. The report should be perceived not as the end or goal, but as the means of communicating the results of the self-study to NCOPE.

II.B.1. The Application/Self-Study Report

The Application/Self-Study Report for Continuing Accreditation

The Self-Study Report documents the self-study process and findings and provides the basis for the on-site evaluation visit. Specific instructions and forms for the preparation of the report are provided in the Guidelines for to the Self-Study Process, available from NCOPE.

The report of the Self-Study accompanies the Application for Continuing Accreditation and is submitted at least two months prior to the date of the on-site evaluation. Five (5) copies of the Report are distributed as follows:

- o one copy to each of the four (4) orthotic and prosthetic reviewers,
- o one copy to NCOPE.

II.B.2. The On-Site Evaluation

Composition of Evaluation/Review Team

A team of three (3) individuals conducts each program evaluation. The composition of the team is the following:

- 1) Educator (non-O&P certified)
- 2) O&P Practitioner/Educator
- 3) O&P Practitioner (non-educator)

Prior to the selection of the team, the program director is provided with a list of potential evaluators, individuals representing academic and clinical orthotic and/or prosthetic education who have been trained as accreditation evaluators. NCOPE members also serve in the pool. The program director is instructed to strike names of individuals who are perceived to have a conflict of interest with the program. In addition, the director is invited to strike up to two (2) names without cause.

The NCOPE representatives are selected from those remaining on the list by the Chair and Vice Chair of NCOPE in collaboration with NCOPE staff. A sincere effort is made to "match" team members to the program and institution being evaluated. Factors affecting the selection include the type of expertise needed, the type of institution that houses the program, geographic proximity and the need to avoid conflict of interest. The team's responsibility is to study the information provided concerning the educational program and the requirements for accreditation, and to carry out an objective and impartial assessment of the quality of the orthotic and prosthetic program seeking accreditation.

One representative is designated as the team chair and serves as the official spokesperson of the team during the evaluation process, assuming primary responsibility for checking the final arrangements before the on-site evaluation, reviewing the suggested schedule and recommending changes, if appropriate, and overseeing whatever follow-up activities are indicated.

Preparation for the On-Site Evaluation

On-Site Schedule

On-site evaluations are usually scheduled for 1 1/2 days, with visitors generally arriving the evening before the visit and departing in the early afternoon on the second day. For weekend programs or programs located on more than one campus, adjustments to the schedule are made in collaboration with the program director. **Any other request to alter the length of the on-site evaluation must be submitted in writing to the Commission at least 3 months prior to the scheduled on-site evaluation.**

The program director prepares a tentative schedule for the on-site evaluation, using the sample schedule (following this section) and adjusting it to most appropriately represent the program.

The schedule should include interviews with:

- o the program director, for the purpose of mutual orientation and discussion of administrative responsibilities.
- o the program director and orthotist and/or prosthetist members of the faculty as a group for discussion of philosophy, goals and organization of the program.
- o representatives from each class in the program to discuss their views of the program and courses. Each group should be scheduled separately if possible.
- o key non-orthotist and/or non-prosthetist faculty members to discuss their administrative, advisory and teaching responsibilities as related to the orthotic and prosthetic program, the objectives and content of the courses, the means of evaluating student performance, and to discuss relevant plans and activities of the faculty for the future. For these interviews, the faculty may be grouped as appropriate for discussion of the curriculum content areas.
- o recent graduates in clinical settings to discuss their views of the program courses.
- o the college/university president and/or designated administrative officer for the purpose of mutual orientation.
- o the administrator to whom the program director is directly responsible (i.e., dean of the school of allied health) for orientation of the team members to the university and school or college and to the importance of the program to the campus and the community.

- o orthotic and/or prosthetic faculty members to discuss their administrative, advisory and teaching responsibilities as related to the O&P program, the objectives and content of courses, the means of evaluating student performance, and to discuss relevant plans and activities of the faculty for the future. For these interviews, the faculty may be grouped as appropriate for discussion of the curriculum content areas.

The program director should arrange an effective and efficient schedule with faculty interviews arranged so that each instructor is interviewed and each *Standard* is addressed. Previous experience demonstrates that it is helpful in some instances for the team to have individual interviews with key instructors, and in other instances, for them to meet in groups (e.g., when several teach together). The structure of these sessions depends on faculty size and grouping for teaching. NCOPE recognizes that each program uniquely integrates the requirements of the *Standards* into its curriculum design and that the design should impact the schedule. When the schedule is complete, please indicate the name, title and highest degree for each interviewee, the name and catalog number of course(s) taught, and the *Standard(s)* being covered.

When planning and scheduling the meeting between the on-site team, the program director should plan for approximately one hour of discussion.

Students may not be knowledgeable regarding the accreditation process. The program director should inform them of the purpose of the visit and the interviews and the types of questions that the team might ask. Typical questions to the students may include:

- o Even the best educational program can be improved. What do you think could be done to make this program better?

In addition to interviews, forty-five minutes should be set aside on the first day for reviewing student records, evaluations of student performance (including examinations), clinical data and availability of published documents providing a description of the program, selection and retention information, rights and appeal mechanisms, etc. A half hour (or more if needed) should be scheduled for a tour of the facilities, including classrooms, laboratories, offices and the library.

A short period should be left free for the team to review materials at the end of each day, and no meetings or activities of any nature should be scheduled for the evenings.

The tentative on-site schedule should be forwarded to each of the NCOPE representatives on the team and to the NCOPE staff *at least* one month in advance of the on-site evaluation. Should there be suggestions for change of the tentative schedule, the team chair will submit them to the program director for consideration.

The program director should finalize the schedule with the on-site evaluation team chair prior to confirming appointments because the team chair may wish to make adjustments to the schedule. After the team chair has been contacted and the schedule is confirmed, a final copy should be mailed to each team member and to the NCOPE staff prior to the on-site evaluation.

Sample Schedule for On-Site Evaluation for an Educational Program

8:30 - 9:30 a.m. A meeting with the program director.

Purpose:

1) To allow the evaluators to review briefly the purpose of the site visit, the accreditation process, and the roles and functions of the review committee, and

2) To review the schedule for the first day as planned by the program making adjustments as necessary.

Initial meeting with program director to discuss philosophy, goals, curriculum and organization of educational program within the institution.

9:30 - 10:30 a.m. Tour classroom, laboratory, faculty office spaces, and library or study center.

10:30 - 11:30 a.m. Meet with primary orthotic and/or prosthetic faculty (excluding program director) to discuss their teaching, advisory and administrative responsibilities; the objectives and content of specific courses; the means used to evaluate students' achievement of objectives; and opportunities for professional development.

11:30 - 12:30 p.m. Meet with 4-6 students enrolled in the program.

12:30 - 1:00 p.m. Meeting with key administrative officials (those to whom program director reports) to discuss administration relationships plans for the program.

1:00 - 2:30 p.m. Lunch

2:30 - 5:30 p.m. Review student records, methods of evaluating student performance including examinations, availability of description of program, selection and retention information, rights and appeal mechanisms, etc.

Evening The program is requested not to schedule activities for the evening. The site visitors use dinner and evening hours to discuss information acquired throughout the day, to identify areas requiring further inquiry the following day, and to draft as much of the Site Visit Report as possible.

Second Day

8:30 - 9:30 a.m. Team with the program director to arrange set-up for report preparation to get any additional information needed.

9:30 - Open ended Exit Conference

Final conference for team report and discussion with program director.

Arrangements for the On-Site Team

o **Meeting Room**

If possible, the program director should assign a room to the team and arrange for all interviews and conferences to be held there. This minimizes time spent in moving about. It is helpful if the room is arranged conference style with a large table on which the team may work.

o **Travel**

The program director is asked to furnish transportation information to the team; i.e., nearest airport, best method of reaching the institution, routes for those driving. Team members will make their own travel arrangements and notify the program director of their plans and schedules.

o **Accommodations**

The program director is asked to provide hotel information for a convenient, moderately priced hotel or motel for the night prior to the on-site evaluation and the following night. The names and addresses of the site team will be provided to the program director by the NCOPE staff.

It is the responsibility of the on-site evaluators to make their own hotel arrangements. On-site evaluators are responsible for their own expenses (i.e., hotel and meals). Reimbursement of those expenses is handled directly through NCOPE. The program will be invoiced, upon completion of the site visit, for the teams expenses.

o **Telephone Contacts**

Team members and NCOPE staff should be sent the office and home telephone numbers of the program director, or another number for weekends and evenings, in the case of an emergency prior to the on-site visit.

In addition, the program director is asked to furnish team members and NCOPE staff with telephone numbers at which the team members may be reached during the visit in case of emergency.

The On-Site Evaluation

The well-planned on-site evaluation visit usually proceeds smoothly. The team generally meets with the program director at the beginning and end of each day for a brief report on their progress, needs, concerns, etc. The team chair keeps the program director apprised of any additional information that the team determines it needs or any changes desired in the schedule (e.g., to pursue a particular area of concern).

The Interviews

The site teams observations on the following points contribute to their final decisions relative to compliance with the *Standards*:

1. The degree of support from the administration for the orthotic and/or prosthetic practitioner program.
2. The degree of support from the non-orthotic and non-prosthetic teaching faculty for the O&P program.
3. The level of responsibility afforded the program director for:
 - o faculty selection, development and retention
 - o budget development and control
 - o program development, general effectiveness and evaluation
4. The program director's and faculty's understanding and ability to articulate the:
 - o program's mission (goals)
 - o institution's mission (goals)
5. The faculty's understanding and ability to articulate the program's:
 - o philosophy
 - o curriculum design
 - o course objectives
6. The students' ability to express their perception of their roles as orthotists and/or prosthetists and their attitudes toward the profession.
7. Appropriate opportunities for clinical experience during and following didactic program.
8. Future plans for the orthotic and/or prosthetic practitioner program:
 - o systematic and periodic program evaluation
 - o continuing professional development
 - o support from the administration

The Exit Conference

A summation conference is held with the program director (or designated representative). At this time, the on-site team expresses appreciation for the courtesies extended during the site visit and informs the group of the next steps in the accreditation review process. Initial impressions of the site visit will be shared with the program director, faculty, students and other invited guests.

Report Back to Programs

After the on-site team evaluators finalize their report and return it to NCOPE, it will be returned to the program for review and comment on the accuracy of the report. Once the program has had a chance to respond, all reports are then reviewed by the Commission for determination of accreditation.

Following the On-Site Evaluation

Action on the Evaluators' Report of On-Site Evaluation is taken by NCOPE at the next scheduled meeting following the visit. The chief executive officer, dean and program director are sent a copy of the action letter and the final Report of NCOPE. It should be noted that the Report of NCOPE may differ from the Evaluators' Report of On-Site Evaluation presented at the conclusion of the visit. For example, the Commission may act to change one or more "Suggestions" to "Deficiencies" or vice versa based on its analysis of the findings.

Notification of NCOPE's recommendation for accreditation will be forwarded to the orthotic and/or prosthetic program director and the appropriate officials of the institution.

If deficiencies are identified in the final report, the program is required to submit a Plan of Correction by the date specified by NCOPE (See **Section III.F.1.**)

Procedures for Emergencies During On-Site Evaluations

In the event that an on-site evaluator is unable to complete his/her team responsibility due to an emergency (e.g., illness or accident), the team chair will meet with the program director and appropriate administrators to determine if the on-site evaluation should continue or be aborted and rescheduled.

- o If the evaluation team chair feels that the member could satisfactorily continue and complete the on-site evaluation and institution personnel agree, the on-site evaluation will be continued.

If institution personnel disagree, the on-site evaluation will be aborted and rescheduled.

- o If the evaluation team chair feels that the evaluation process has been too seriously affected to continue and institution personnel agree, the on-site evaluation will be aborted and rescheduled.

If institution personnel disagree, the on-site evaluation will be continued and circumstances will be documented in the Report of On-Site Evaluation.

The team chair will notify NCOPE of the decision and action taken.

Post On-Site Evaluation Visit Survey

Following the on-site evaluation visit, the program director and dean will each be sent a survey regarding the accreditation process. This survey is the primary mechanism for ongoing monitoring of the perceptions of the academic community regarding the accreditation process. Information from these surveys is compiled and used in modifying accreditation procedures. A candid response is therefore appreciated. The completed surveys are not seen by the Commission prior to its taking final action on the program.

II.B.3. Accreditation Actions

Following NCOPE review of the Report of the On-Site Evaluation, action is taken to grant Developmental Accreditation or recommend to CAAHEP Initial Accreditation, Continued Accreditation, Probationary Accreditation, Accreditation Withheld or Accreditation Withdrawn. (Descriptions of these accreditation statuses are provided in **Section II.D.**) Letters of notification are sent to the chief executive officer, the dean and the program director, along with copies of the Report of NCOPE. Copies of letters granting Probationary Accreditation, Accreditation Withheld or Accreditation Withdrawn are sent certified mail, return receipt requested.

Procedures for request for reconsideration and appeal of the Commission actions are found in **Section II.E.**

If deficiencies are identified in the Report of NCOPE, a Plan of Correction and subsequent progress reports are required. (See **Sections II.F.1. and II.F.2.**). Note that deficiencies may generally not be carried for more than two (2) years. (See **Section II.D.**)

Opportunity for Withdrawal of Application

The sponsoring institution has the option to withdraw its request for continuing accreditation at any time prior to NCOPE's consideration. Programs selecting this option relinquish the opportunity to appeal that is provided to programs receiving a status of Accreditation Withdrawn-Involuntary.

II.B.4. Maintaining Accreditation

The requirements are that the program must:

- o submit all required reports,
- o pay all fees on time,
- o notify NCOPE promptly of a change in program director, and
- o agree to a date for an on-site evaluation during the scheduled time frame.

NCOPE may require additional reports or schedule a fact-finding visit if indicated by information provided in reports or as a result of a formal complaint. (See **Section III.B.**)

II.C. Additions or Changes

II.C.1. The Letter of Intent

Policy Statement

When an institution having an accredited educational program makes a decision to add to or change the location, level or format of that program, the additional/changed program is subject to accreditation procedures.

The accreditation status of the existing program may not accrue to the additional/changed program until the procedures for adding to or changing an educational program are followed.

Additions and changes which require separate review are:

- o additions or changes in program level (i.e., baccalaureate, certificate, professional master's),
- o additional locations (e.g., satellites), and
- o additional or changes in formats (e.g., weekend programs).

Minor program changes or additions that may be submitted with the Annual Report in lieu of the separate review procedures described below include: changes between quarter/semester systems, move to new facilities within the current administrative unit, adding an extended or part-time track.

The program must apply as a NEW program and is subject to initial review procedures and fees if:

- a) the degree-granting institution is not the same as that of the currently accredited program, or
- b) an institution with an accredited educational program for the orthotic and/or prosthetic practitioner adds a program for the orthotic and prosthetic technician, or
- c) an institution with an accredited educational program for the orthotic and prosthetic technician adds a program for the orthotic and prosthetic practitioner.

Letter of Intent

A Letter of Intent to enter the additional/changed program into the accreditation process should be sent at least 18 months prior to the time the first group of students will complete the program. (NOTE: It is imperative that the evaluation process be completed prior to the graduation of the first class of students.) The Letter of Intent must include a description of the addition and/or change, the month and year orthotic and prosthetic practitioner students will enter the new program and the month and year the first class will graduate. The Letter of Intent must be signed by the chief executive officer and by the orthotic and/or prosthetic program director and sent to:

National Commission on Orthotic and Prosthetic Education
330 John Carlyle St., Suite 200
Alexandria, VA 22314

II.C.2. Application and Required Documentation

Application for Accreditation of Additions or Changes

The application for accreditation of an addition or change in educational programs and the instructions regarding required documentation will be provided, upon request, by NCOPE. A full Self-Study Report generally is **not** required. A matrix is provided as a guide to indicate areas in which it is anticipated that information is required. The specific documentation will depend on the addition or change.

Basically, the program should address each *Standard*, either indicating that there is no change in that *Standard* from the currently accredited program or explaining the change and the impact of that change. Information that is current and available in the most recent Self-Study Report need not be resubmitted.

The NCOPE Director notifies the program director of the names and addresses of those to whom the application materials are to be mailed. Three copies of the materials generally are required initially. Two additional copies are requested if NCOPE determines that an on-site evaluation is required.

II.C.3. The Review Process

Review Process for Additions or Changes

Upon receipt of a Letter of Intent to add or change the location, level or format of a program, the Director of NCOPE forwards the "Application for Accreditation of an Addition/Change in an Orthotic and/or Prosthetic Educational Program" and a timetable for the accreditation process.

A **tentative** on-site evaluation date is established, based on the projected graduation date of the first class to complete the additional/changed program. An on-site evaluation may not be required; however, final decision regarding this is made by NCOPE after review of the application and accompanying documentation.

A subcommittee of NCOPE is appointed by the Chair to review application materials. If possible, reviewers currently assigned to the existing program are selected for the subcommittee.

The NCOPE subcommittee reviews the application materials and reports its findings to NCOPE at its next scheduled meeting.

Following review by NCOPE, any one of the following actions may be taken:

- o Proceed with a full-scale, on-site evaluation as scheduled.
- o Proceed with a modified on-site evaluation (e.g., decrease the time involved or the number of on-site team members).
- o Defer action, request that additional information be submitted, and postpone or cancel the on-site evaluation.
- o Grant the additional/changed program be accredited on the basis of the paper review, and cancel the tentatively scheduled on-site evaluation.

Fees

There is no charge for the paper review for an addition to or change in a program at an institution with an already accredited program.

If an on-site evaluation is required, an initial on-site fee will be charged. (See **Section IV.A.**)

II.D. Classification of Accreditation Categories

The following Accreditation Categories are used by NCOPE in granting an appropriate action, based on NCOPE's evaluation of the extent to which an educational program complies with the *Standards*, the minimum standards for accreditation.

The sponsoring institution of a program may withdraw the Application at any time before NCOPE considers the application.

Students successfully completing a program that is granted any of the following Accreditation Categories at any point during their tenure as students are regarded as graduates of an NCOPE-accredited program.

II.D.1. Accreditation Categories

A. DEVELOPMENTAL ACCREDITATION

The proposed program would appear to meet the *Standards* if fully implemented in accordance with the plans of the sponsoring institution. This status is not to extend beyond one year. It is issued by NCOPE prior to recommendations moving forward to CAAHEP

B. ACCREDITATION

Initial accreditation is granted to a program by action of CAAHEP, upon recommendation of NCOPE prior to the graduation of the first class. Continuing accreditation is granted to a fully operational program by action of CAAHEP, upon recommendation of NCOPE. A self-study and an on-site evaluation are integral parts of both the evaluation for initial accreditation and continuing accreditation. The accreditation review process confirms that the program is in substantial compliance with the *Standards*.

A program in *substantial compliance* with the *Standards* may be deficient in one or more specific *Standards* that are believed to be readily correctable. NCOPE provides the sponsoring institution with a clear statement of each deficiency. On or before the specified due date, the institution must submit to NCOPE a plan for correcting the indicated deficiency(ies). This plan should include a schedule for correcting deficiencies within a reasonable period of time (usually not more than two years). NCOPE will assess the adequacy of the plan to return the program to full compliance with the *Standards* and will require Progress Reports documenting how each deficiency has been or is being resolved. If NCOPE determines that the program has not returned to compliance with the *Standards* within a reasonable period of time (usually not more than two years), NCOPE may recommend Probationary Accreditation or take other appropriate action. The notification of accreditation letter will inform the institution of the status awarded to the educational program.

C. PROBATIONARY ACCREDITATION

Probationary Accreditation is granted when the program is *not in substantial compliance* with the *Standards*:

- o because the deficiencies are so serious that the capability of the program to provide acceptable educational experiences for the student is threatened, or
- o because the program has not corrected deficiencies within a reasonable period of time (usually not more than two years).

If the cited deficiencies are not in dispute, NCOPE may recommend Probationary Accreditation without conducting an on-site evaluation. However, most awards of Probationary Accreditation are based on evidence obtained during an on-site evaluation or fact-finding visit.

Probationary Accreditation is usually limited to one year. It may not extend beyond two years.

The appropriate official is provided with a clear statement of each deficiency contributing to the failure to be in substantial compliance with the *Standards*. This official is also notified of the due date for the required Plan of Correction. NCOPE will assess the adequacy of the plan to return the program to substantial compliance with the *Standards* and will require Progress Reports documenting how each deficiency has been or is being resolved. Failure to come into substantial compliance with the *Standards* will result in a recommendation that accreditation be withdrawn.

Opportunity for Reconsideration/Appeal

NCOPE provides an opportunity for reconsideration prior to action. (See **Section II.E.**) Following NCOPE's reconsideration of a recommendation, if denied, recommendation to CAAHEP of Probationary Accreditation are final and are not subject to appeal.

D. ADMINISTRATIVE PROBATIONARY ACCREDITATION

The institutional sponsor and the accredited program will be advised that the program is on Administrative Probationary Accreditation when the program does not comply with one or more of the following administrative requirements for maintaining accreditation:

1. Submitting the Self-Study Report, a required Plan of Correction, a required Progress Report or the Annual Report to NCOPE by the specified due date.
2. Agreeing to a reasonable on-site evaluation date within the year specified for reevaluation for continuing accreditation.
3. Paying accreditation fees within ninety (90) days after being notified of a past-due account.
4. Documenting within ninety (90) days of a new appointment that the program has retained and/or changed key program personnel (i.e., program director), as required by the *Standards*.

When an accredited program has failed to satisfy the requirements identified above, the Executive Director of NCOPE, after consultation with the Commission, will promptly notify CAAHEP and the chief executive officer (CEO) of the sponsoring institution, the dean or comparable administrative officer and the program director that the program is being recommended for Administrative Probationary Accreditation until the Commission's administrative requirement has been satisfied.

At its next scheduled meeting, NCOPE reviews the probation status and determines if a recommendation for withdrawal of accreditation is merited.

When and if the program satisfies the requirements, the NCOPE promptly notifies CAAHEP and the CEO, the dean or comparable administrative officer and the program director that Administrative Probationary Accreditation has withdrawn and the program's accreditation be reinstated.

NCOPE does not provide opportunity for reconsideration of recommendations of Administrative Probationary Accreditation. NCOPE recommendations of Administrative Probationary Accreditation are

final and are not subject to appeal. During a period of Administrative Probationary Accreditation, programs are recognized and listed as being accredited.

II.D.2. Non-Accreditation Categories

A. ACCREDITATION WITHHELD

A program seeking initial accreditation may have accreditation withheld if the accreditation review process confirms that the program is not in substantial compliance with the *Standards* that are vital to the educational program.

The appropriate official is provided with a clear statement of each deficiency and is informed that a new application for accreditation may be made whenever the program is believed to be in substantial compliance with the *Standards*. A Letter of Intent must be filed and the Letter of Review process repeated. Initial fees would be reassessed.

Opportunity for Withdrawal of Application

The institution sponsoring a program may withdraw the Application for Initial Accreditation at any time prior to NCOPE's consideration. Programs selecting this option relinquish the opportunity to appeal that is provided to programs receiving a status of Accreditation Withheld.

Opportunity for Reconsideration/Appeal

Prior to recommendation, NCOPE provides opportunity for reconsideration of the recommendation to withhold accreditation. The letter informing the appropriate official of the accreditation recommendation describes the reconsideration process. The letter from NCOPE notifying the appropriate official that the program has had accreditation withheld for failure to be in substantial compliance with the *Standards* indicates that the institution may appeal the decision. (See **Section II.E.**)

B. ACCREDITATION WITHDRAWN

Students enrolled in the program at the time the sponsoring institution is notified that accreditation has been withdrawn may complete the requirements for graduation and will be considered graduates of an NCOPE accredited program.

1. Accreditation Withdrawn-Voluntary *(at the request of the sponsoring institution)*

The appropriate official of a program may at any time inform CAAHEP in writing that the program is or will be discontinued by a given date or that the official wishes to have accreditation withdrawn. This notification is acknowledged by NCOPE.

The official is informed that the sponsoring institution must apply for accreditation as a new applicant should it wish to resume sponsorship of an accredited program.

2. Accreditation Withdrawn-Involuntary *(for failure to be in substantial compliance with the **Standards** or with administrative requirements).*

Accreditation may be involuntarily withdrawn from a program with Probationary Accreditation if the accreditation review process confirms that the program has not come into substantial compliance with the **Standards** or with the administrative requirements for maintaining accreditation within a reasonable period of time, usually no longer than one year.

The appropriate official is provided with a clear statement of each deficiency and is informed that the sponsoring institution may apply for accreditation as a new applicant whenever the program is believed to be in compliance with the **Standards** and with the administrative requirements for maintaining accreditation.

Opportunity for Withdrawal of Application

The institution sponsoring a program may withdraw the Application for Continuing Accreditation at any time prior to NCOPE consideration. Programs selecting this option relinquish the opportunity to appeal that is provided to programs receiving a status of Accreditation Withdrawn-Involuntary.

Opportunity for Reconsideration/Appeal

Prior to recommendation the Commission provides an opportunity for reconsideration of a recommendation to withdraw accreditation. The letter informing the appropriate official of the accreditation recommendation describes the reconsideration process.

The letter from CAAHEP notifying the appropriate officials that the program has received Accreditation Withdrawn--Involuntary indicates that the institution may appeal the decision (See **Section II.E.**)

a. From Initial or Continuing Accreditation

If the accreditation review process confirms that a program is in substantial compliance with the *Standards* and with administrative requirements, the program is awarded continuing accreditation. If the program is not in compliance with the standards and requirements, NCOPE may recommend Probationary Accreditation (including Administrative Probationary Accreditation) or Accreditation Withdrawn.

In unusual circumstances, such as evidence of critical deficiencies that appear to be irremediable within a reasonable length of time, or a documented threat to the welfare of current and potential students, upon recommendation NCOPE recommend to CAAHEP withdraw accreditation without first providing a period of probation.

Programs from which accreditation is involuntarily withdrawn without a probationary period are ensured due process, as described in **Section II.E.** - "Reconsideration/Appeals Process."

b. From Probationary Accreditation (including Administrative Probationary Accreditation)

If the accreditation review process confirms that a program has corrected the identified deficiencies leading to probation within a reasonable period of time and is in substantial compliance with the *Standards* and with administrative requirements, the program is awarded continuing accreditation. If the identified deficiencies are not corrected within a reasonable period of time (usually no more than one year), NCOPE may grant extension of Probationary Accreditation or Accreditation Withdrawn.

II.E. Reconsideration/Appeals Process

Prior to action, institutions may request NCOPE's reconsideration of the recommendation to grant Probationary Accreditation Withheld or Accreditation Withdrawn. NCOPE awards of Probationary Accreditation following the Commission's reconsideration of a recommendation are final and not subject to appeal.

Following NCOPE action, the institution may appeal an adverse decision to withhold or withdraw accreditation by submitting in writing its objections, together with supporting data and a request for reevaluation.

Procedures for both processes are detailed below.

Procedure for Reconsideration

1. Request for Reconsideration of NCOPE to Withhold or Withdraw Accreditation:

The Commission informs the program of its decision to withhold or withdraw accreditation, including:

- a. Specification of the areas in which the program is not in substantial compliance with the *Standards*.
- b. The description of the process for reconsideration, including the time within which a request must be made.
- c. A statement that the sponsoring institution or program may withdraw its request for initial or continuing accreditation at any time prior to NCOPE's consideration to withhold or withdraw accreditation. Programs selecting this option relinquish the opportunity to appeal that is provided programs receiving a status of Accreditation Withheld or Accreditation Withdrawn--Involuntary.

The sponsoring institution may submit, at any point prior to NCOPE action, a request that the recommendation be reconsidered by NCOPE. If such a request is received action by NCOPE is deferred, and the recommendation will be reconsidered at the next meeting of NCOPE. Additional documentation and/or clarification *may* be provided by the sponsoring institution for the reconsideration discussions. NCOPE will then forward its decision to the sponsoring institution. Only one request for reconsideration may be made for any NCOPE recommendation.

If the sponsoring institution does not withdraw its request for initial or continuing accreditation or does not request NCOPE reconsideration of the accreditation within the stipulated time, NCOPE will act on the recommendation at its next regularly scheduled meeting.

NCOPE informs the program of its decision of Probationary Accreditation, and the sponsoring institution may request reconsideration as described above.

If there is no request for Commission reconsideration of the accreditation recommendation within the stipulated time, NCOPE acts on the recommendation at its next regularly scheduled meeting.

NCOPE awards Probationary Accreditation following their reconsideration. Once reconsideration is recommended and reviewed, the decision is final and not subject to appeal.

Appeals Procedures

NCOPE provides clearly delineated procedures for programs wishing to appeal actions of Accreditation Withheld or Accreditation Withdrawn. These procedures follow due process.

1. Criteria for Appeal

Institutions are entitled to file an appeal only in the event of a NCOPE action to withhold or withdraw accreditation. An appeal filed in accord with the NCOPE Appeals Procedures automatically delays the decision to withhold or withdraw accreditation until its final disposition.

2. Initiation of an Appeal

All correspondence referred to herein shall be sent by certified mail, return receipt requested. All days refer to business days. The chief executive officer of an institution sponsoring a program that has had accreditation withheld or withdrawn by NCOPE may request a hearing before an appeals hearing panel. Appeals may be based only on the contention that the NCOPE decision was not supported by documented evidence of deficiencies in compliance with the *Standards*. The institution's request for a hearing shall be made in writing and shall include a concise statement of the basis on which the accreditation decision is being contested. The request must be received by NCOPE within 15 working days after the program receives the NCOPE notice of its action to withhold or withdraw accreditation.

3. Criteria for Selecting an Appeals Hearing Panel

An appeals hearing panel shall be composed of three individuals who are familiar with the accreditation process and who have a working knowledge of the *Standards* and the administration and functional components of the specific type of institution sponsoring the educational program under review (e.g., community college, university). Current members of NCOPE are not eligible for membership on an appeals hearing panel, nor are individuals who are or have been previously involved with sponsoring institution or the accreditation review activity that led to this specific NCOPE action.

4. Process for Selecting an Appeals Hearing Panel

A list of five individuals qualified to serve as members of an appeals hearing panel shall be prepared under the direction of NCOPE.

The list shall be sent to the institution within 20 working days of NCOPE's receipt of the request for a hearing. Within 15 working days of receipt of the list, the institution shall select three individuals from the list to constitute the appeals hearing panel and shall notify NCOPE of the names of the persons selected.

5. Appeals Hearing Date and Participants

The hearing shall be held as soon as feasible, preferably within 30 working days of the selection of the appeals hearing panel. After consultation with the chief executive officer of the institution appealing to the accreditation decision and the panel members, NCOPE shall establish the date, time and place for the hearing.

At least 20 working days before the hearing, the institution shall be notified by NCOPE of the date, time and place it will be held. Upon convening, the panel will elect a Chair from its members. At hearings conducted before the appeals hearing panel, institutions may offer testimony that is relevant to the issues to be decided by the panel, i.e., the existence of the cited deficiencies and observation of proper accreditation procedures.

At least 15 working days before a hearing, the institution may request in writing the presence of any individual whom it wishes to question. NCOPE will be advised of such requests and will extend invitations accordingly but cannot assure attendance.

6. Panel Preparation Summary

- o The three member hearing panel assembles with staff at the designated place and time, but before its meeting with appellants.
- o NCOPE staff reviews policies, correspondence and related documents applicable to the issues in the hearing and responds to questions from panel members.
- o The panel reviews the Chair's preliminary statement.
- o The panel reassembles in a room designated for the hearing.

7. Hearing Format

- o The Chair makes a preliminary statement.
- o Each person present is identified and the Chair describes the procedures.
- o The Appellant makes a presentation.

The manner of presentation is determined by the appellant's representatives. Legal counsel may be present and take part in the presentation. The presentation must be limited to the issues related to the adverse action.

- o Clarification is made.

The Chair directs that time be given for questions and answers from any participant and panel member.

- o Recess is called.

A brief executive recess is called by the Chair for additional considerations. The appeals hearing panel may agree to receive, or may request, additional written material before completing its findings.

- o The Hearing is concluded.

Final statements, information and questions are called for by the Chair.

8. Ground Rules

- o Information relevant to an appeals hearing will consist of that evidence presented to the Commission with regard to the conditions that existed in the program at the time of the latest site visit and on information about subsequent changes filed with NCOPE before the Commission's reconsideration.
- o The appeals hearing panel determines the relevance of the information presented. The panel determines what information is pertinent and ignores that which is not.
- o Programs may not present the appeals hearing panel with revised data or program descriptions that were not reviewed initially by the Commission or on the occasion of a requested reconsideration. Such amendments offered by the program at the time of the appeals hearing must be ignored by the panel.
- o Upon request of the program, the appeals panel may, permit the program to file additional written materials with NCOPE for review by the appeals panel. Said written materials must comply with all of the above criteria relating to the admission of evidence at the hearing, and must be filed within six days following the conclusion of the appeals hearing.

9. Appeals Hearing Panel Recommendation and Final NCOPE Action

The recommendation of the panel shall be based on the evidence presented to it with regard to the conditions that existed in the program at the time of the latest site visit and on information about subsequent changes filed with NCOPE before reconsideration. The findings and recommendations of the appeals hearing panel shall be submitted by its Chair in writing to NCOPE within 10 days after the hearing date, unless the panel has granted the program permission to file additional written materials as described above. In such case, the panel shall file its findings and recommendations with NCOPE within six days after receipt of the additional written materials submitted by the program.

10. Post-Hearing Procedure

In executive session or in a conference telephone conversation, if appropriate, the panel members reach a decision on the issues presented in the appeal. The appeals panel makes its findings and recommendations as follows:

- a. Each cited deficiency is considered separately, and the panel determines whether each deficiency is supported by substantial evidence.
- b. The panel determines whether those deficiencies that are supported by substantial evidence are sufficient to support the action of accreditation withheld or accreditation withdrawn.
- c. The panel considers whether there is substantial evidence of noncompliance with proper accreditation procedures, and if so, whether the noncompliance is sufficient to recommend a reversal of the accreditation action.
- d. The panel then drafts a report detailing its findings as described in paragraphs a-b-c above and concludes by making a recommendation as to whether the accreditation action should be sustained or reversed.

Final Decision and Notification

NCOPE as a whole receives the findings and recommendation of the Appeals Hearing Panel, for final action.

NCOPE's final action may be determined in executive session at a regularly called meeting of NCOPE, or by mail ballot of its members. The Chair and the Vice-Chair of NCOPE will determine the procedure of choice. Upon achieving a final decision, NCOPE will notify officially the chief executive officer of the program's sponsoring institution of the decision.

Financial Responsibility for an Appeals Hearing

The institution making the appeal shall bear the expense involved in the development and presentation of its appeal. Reasonable expenses directly associated with the hearing, such as those for the meeting room and for travel, meals and lodging for members of the panel, shall be divided equally between NCOPE and the institution making the appeal. Reasonable expenses of witnesses directly associated with the hearing shall be borne by the party requesting their presence.

Extension of Time Limits

Under extraordinary circumstances, the time limits specified herein may be extended with the mutual consent of the institution and the Commission.

II.F. Additional Reports

II.F.1. Plans of Correction

Whenever deficiencies are identified as a result of an on-site evaluation, fact-finding visit or other form of program review, a Plan of Correction is required. A form (to be photocopied) for the report and a completed example are provided in **Section VI**. (Additional forms are available from NCOPE).

For each deficiency, the report must include a *description of the plan* for bringing the program into compliance with the *Standards*, a projected time line and a description of the *documentation to be submitted* to demonstrate compliance. If progress has been made toward correcting the deficiency, a summary of the progress may also be included.

The Plan of Correction should be dated and signed by the program director and Dean. *Three copies* of the report should be forwarded to:

National Commission on Orthotic and Prosthetic Education
330 John Carlyle St., Suite 200
Alexandria, Virginia 22314
(703) 836-7114
fax (703) 836-0838

NCOPE reviews the Plan of Correction and takes action to Accept or Receive the report. If NCOPE determines that execution of the Plan of Correction is likely to bring the program into compliance with the cited *Standards* in a timely manner, the report is **Accepted** and a due date established for a progress report. If the Commission determines that the Plan has inadequately addressed the deficiency or that execution of the Plan is not likely to bring the program into compliance with the cited *Standards* in a timely manner, the report is **Received** and a due date established for a revised Plan. The letter notifying the program director that the Plan of Correction has been Received will specify in what way the Plan was considered inadequate.

II.F.2. Progress Reports

Progress Reports

Following acceptance of a Plan of Correction, quarterly Progress Reports are required until all deficiencies are corrected. A form (to be photocopied) for Progress Reports and a completed example are provided in **Section VI**. (Additional forms are available from NCOPE).

For each deficiency, the report should indicate whether the program believes that the deficiency has been corrected. It should also provide a summary of the progress made toward correcting the deficiency, the documentation that is being submitted and additional action to be taken (if any) with a time line for completion. If no progress has been made toward correcting the deficiency, a statement to that effect should be included.

The Progress Report should be dated and signed by the program director and Dean. **Three copies** of the report should be forwarded to:

National Commission on Orthotic and Prosthetic Education
330 John Carlyle St., Suite 200
Alexandria, VA 22314

NCOPE will review the Progress Report and determine whether any or all deficiencies have been corrected fully. If deficiencies remain, a due date for an additional report will be established.

If a change in status is indicated, the program will be notified of NCOPE's action.

II.F.3. Annual Reports

NCOPE requires each accredited program to submit an Annual Report. Forms for completion of the report are mailed in March and due in April (See **Section V.**)

The purpose of the report is to facilitate ongoing monitoring of programs during the five years between full evaluations for continuing accreditation. Questions are designed to elicit self-evaluation of continuing compliance with the *Standards*. For maximum benefit to the program, the report should be discussed by the entire program faculty and should be incorporated into, or flow directly from, a program's ongoing evaluation.

Reports are reviewed by NCOPE at its summer (July) meeting. Actions that may be taken by the Commission include:

1. Acceptance of the report with no further action required.
2. Acceptance of the report contingent upon receipt and approval of additional information. The letter will specify information to be submitted.
3. Receipt of the report with a request for clarification of one or more items if the information received indicates potential noncompliance with the *Standards*. Following receipt of the follow-up information, NCOPE will act upon the report a second time. If there are areas of noncompliance with the *Standards*, one or more deficiencies are identified and follow-up reports (Plan of Correction or Progress Report) are required. (See **Sections II.F.1. and II.F.2.**)

II.F.4. Program Director Changes

A requirement for maintaining accreditation is that NCOPE be notified promptly if the program director of an accredited orthotic and/or prosthetic practitioner educational program is changed.

If the position is vacant, written notification should include the plan for filling the position.

If the position has been filled by an acting or permanent program director, written notification should include the following documentation (3 copies each):

1. The name, credentials, title and effective date of appointment of the new program director.
2. The program director's curriculum vitae. The curriculum vitae should detail orthotic and/or prosthetic experience, and should give particular attention to experience and qualifications in academic teaching and administration. It is also helpful to NCOPE if the program director provides a summary of experience and qualifications that are pertinent to the current *Standards*.
3. A statement concerning the program director's equivalent educational qualifications if the master's or doctoral degree has not been obtained.

NCOPE will review the information at its next scheduled meeting and determine compliance with the *Standards*.

The institution housing the program will be notified by the NCOPE Chair of the results of the credentials review as soon as possible following the meeting at which action was taken.

If review of credentials for a director of an established orthotic and/or prosthetic educational program reveals noncompliance with the current *Standards*, the program may receive a deficiency and be required to submit a progress report to NCOPE.

Initial Appointment of Program Director at Developing Educational Programs

Experience has demonstrated that the success of a new educational program in orthotics and prosthetics is directly related to the qualifications of the program director responsible for its development. Experience in an academic setting is particularly relevant. Therefore, new orthotic and prosthetic practitioner programs are requested to submit the credentials of the program director for preliminary review as soon as the individual is hired, prior to submission of the initial self-study report. The credentials are reviewed by NCOPE as an advisory process, to identify potential problems regarding approval of qualifications.

Three copies of the program director's curriculum vitae should be sent to NCOPE.

The curriculum vitae should detail orthotic and prosthetic experience, and should give particular attention to experience and qualifications in academic teaching and administration. It is also helpful to the Commission if the program director summarizes those aspects of experience and qualifications that are pertinent to the *Standards*. (See **Section V.** - "Summary of Program Director Credentials.")

NCOPE reviews the information at its next scheduled meeting and determines anticipated compliance with the *Standards*.

The institution housing the program will be notified by the NCOPE Chair of the results of the credentials review as soon as possible following the meeting at which action was taken.

If NCOPE determines that the credentials of a director hired for a developing orthotic and prosthetic educational program do not fulfill the requirements of the *Standards*, a letter is sent to the appropriate administrator identifying the concerns of the Commission.

III. ADMINISTRATIVE PROCEDURES

III.A. Fees

Accreditation Fees

NCOPE is committed to administering a quality accreditation program in a cost- effective manner. The Commission continually seeks opportunities to minimize costs to both the educational programs and to NCOPE.

Application Fee

For *Initial* Accreditation. \$ 1,000

On-Site Evaluation Fee for

Actual AccreditationDirect Expenses

Reevaluation Fee for

Continuing Accreditation\$ 500

Annual Accreditation Fee.....\$ 1,000

Note that institutions housing both O&P practitioner and technician programs must pay the Application, On-Site and Annual fees applicable to each program. Institutions housing more than one O&P practitioner program (i.e., baccalaureate, certificate, professional master's and/or combined baccalaureate/master's) and institutions housing more than one O&P technician program (i.e., associate and certificate) pay only one Application, On-Site and/or Annual Fee.

- o *Application Fees* are billed upon receipt of the initial self-study materials.
- o *Initial On-Site Evaluation Fees* and application on-site surcharges for continuing accreditation are billed after the on-site is completed.
- o *Annual Accreditation Fees* are billed in early February and are payable upon receipt. If early notification is required to facilitate processing of a purchase order for payment, NCOPE should be notified. Annual Fees are due each year, including the year in which an on-site evaluation is scheduled. For new programs, the Annual Fee becomes effective with the first full academic year for which the program has accreditation status.

III.B. Procedures for Complaints

Policy

NCOPE follow due process procedures when complaints are received by NCOPE that indicate that accredited programs, or programs which are seeking accreditation, may not be in substantial compliance with the *Standards*, or may not be following established accreditation policies.

Procedures

1. To receive formal consideration, all complaints shall be submitted to the Director, NCOPE National Office, in writing and signed. The complainant should demonstrate that reasonable efforts have been made to resolve the complaint, or alternatively that such efforts would be unavailing.
2. Complaints are transmitted to the Chair of NCOPE for consideration.
3. Following consultation among members of NCOPE, the Chair of NCOPE determines whether the complaint relates to the manner in which the program complies with the *Standards* or follows established accreditation policies.
 - a. If the complaint does not relate to the *Standards* or to established policies, the person initiating the complaint shall be notified accordingly by the Chair of NCOPE.

- b. If the complaint is judged to relate to program compliance with the *Standards* or to accreditation policies, the following shall be observed:
 - (1) The confidentiality of the complaining party shall be protected unless the complainant authorizes the disclosure of his or her identity or unless such disclosure is required by legal process.
 - (2) The NCOPE Chair or representative shall acknowledge receipt of the complaint and share with the filing party a description of the process and policies which pertain to handling such complaints.
 - (3) The NCOPE Chair or representative shall notify the program director and the chief executive officer of the sponsoring institution of the substance of the complaint and shall request a preliminary investigation and report on the findings within 30 days of the sponsoring institution's receipt of the letter of notice.
 - (4) The NCOPE Chair or representative may request further information or material relative to the complaint from the complaining party, the institution or other relevant sources.
4. On receipt of the responses referred to in 3.b.(3) and (4) above, or at its next scheduled meeting, the Commission shall consider the complaint and all relevant information obtained in the course of investigation and formulate an appropriate action according to the following guidelines:
 - a. If the complaint is determined to be unsubstantiated or unrelated to the *Standards* or established accreditation policies, the complaining party, officials of the program in question and the appropriate official of the sponsoring institution will be so notified.
 - b. If the investigation reveals that the program may not be or may not have been in substantial compliance with the *Standards* or may not be or may not have been following the established accreditation policies, one of two approaches shall be taken.
 - (1) The program may submit a report and documentation demonstrating the manner in which the substantiated complaint has been corrected. Should NCOPE be satisfied with this response, the program, its sponsoring institution and the party filing the complaint should be notified of NCOPE's satisfaction with the resolution of the matter and notice that the program's accreditation status remains unaffected by the complaint.
 - (2) If NCOPE judges the program of sponsoring institution's response to the complaint inadequate and lacking in evidence of the program's continuing substantial compliance with the *Standards* or adherence to accreditation policies, NCOPE may request and arrange for a return on-site evaluation of the program. The purpose of the return on-site evaluation shall be limited to an investigation of the complaint and the manner in which it affects compliance with the *Standards* or with accreditation policies. The cost of the return on-site evaluation shall be borne by NCOPE.
 - (a) Should NCOPE on evidence received through the return on-site evaluation, consider the program to remain in substantial compliance with the *Standards* and in adherence with accreditation policies, the program, its sponsoring institution and the complaining party shall be notified of this assessment and the fact that the program's current accreditation status remains unaffected by the complaint.

- (b) Should NCOPE consider the evidence of the on-site evaluation to indicate the complaint is valid and that the program is not in substantial compliance with the *Standards* or with accreditation policies, NCOPE shall decide a change in accreditation status. The program, its sponsoring institution and the complaining party shall be advised of the decision.
5. Should 4.b (2)(b) pertain, all information regarding the complaint, a full report of its investigation, and NCOPE's decision shall be recorded and the program, its sponsoring institution and the complaining party shall be advised of NCOPE's final action.
6. It is emphasized that NCOPE will not intervene on behalf of individuals or act as a court of appeal for faculty members in matters of appointment, promotion, dismissal, and students in matters of admission and dismissal. NCOPE will intervene only when it believes practices or conditions indicate the program may not be in substantial compliance with the *Standards* or with established accreditation policies.

III.C. Policy and Procedure for Delay of On-Site Evaluation

NCOPE occasionally receives requests for delay of an on-site evaluation. These requests are decided on a case-by-case basis with consideration being given to the following factors:

1. Request for participation in a joint survey.
2. Total interval between on-sites if delay is approved.
3. Impact on current students.
4. Frequency/history for requesting delays.
5. Status at last survey.
6. Changes in program since the last on-site evaluation (e.g., level, length, location).

Whenever possible, rescheduling will be accomplished within the on-site year rather than postponing to the following year. This provides considerable flexibility in scheduling and is an administrative decision not requiring Commission action.

Procedure for handling a request for a delay to the next on-site year is as follows:

1. Requests for delay must be submitted in writing *at least* six (6) months prior to the scheduled on-site.
2. The request is placed on the agenda for the next Commission meeting and acted on by the entire Commission.

3. Until a decision is made by the NCOPE, the program must proceed with preparations as though the on-site were occurring as originally scheduled.

III.D. Failure to Submit Reports

Timely submission of accreditation reports is critical to provide adequate review time prior to NCOPE action. A due date is established for each accreditation report and provided to the program in writing. NCOPE has established the following procedures regarding the failure to submit accreditation reports by the specified due date:

1. When an accreditation report is not received by the specified due date, a warning letter is sent to the program director (with a copy to the dean), stating that the *report must be received within 15 working days of the due date* or the program will be placed on Administrative Probationary Accreditation. (See **Section II.D.**)
2. If a report is received by the Accreditation Department before the end of the 15-day grace period, receipt of the report is acknowledged by the Accreditation Department and the report is reviewed by NCOPE at its next scheduled meeting.
3. If a report is not received by 5:00 p.m. on day 15 of the grace period, the program is to be placed on Administrative Probationary Accreditation.
4. Once a delinquent report is received, it is acknowledged by NCOPE and the Administrative Probationary Accreditation status should be removed.

Note: To accommodate the uncertainty of the U.S. Postal Service and ensure that reports are received by the due date, it is recommended that reports be sent 2 weeks in advance. Otherwise, an overnight delivery service should be considered.

IV. GUIDELINES AND POLICY STATEMENTS

IV.A. Guidelines for Communication with Educational Program and Institutional Representatives

Written Communication

In order to prevent problems related to misunderstanding and/or misinformation, it is the policy of NCOPE that all communications regarding Commission actions related to the accreditation status shall be presented through official written correspondence. Such correspondence is sent directly from NCOPE over the signature of the NCOPE Chairman, and is addressed and copied as follows:

- o For action leading to a change in our reaffirmation of accreditation status, letters are addressed to staff at NCOPE and copied to the CEO, dean, program director and reviewers.
- o For any other Commission action that involves or may involve areas of noncompliance with the *Standards* (i.e, Deficiencies), letters are addressed to the CEO and copied to the dean, program director and reviewers.
- o For other Commission actions that do not directly affect accreditation status, letters are generally addressed to the program director and copied to the reviewers.

Additional written communication related to procedures and scheduling for the accreditation process is sent directly to the program director from the Executive Director of NCOPE.

IV.B. Policy on Disclosure and Confidentiality

Statement on Confidentiality

NCOPE maintains the confidentiality of information collected during the accreditation process. Materials such as Self-Study Reports, Plans of Correction, Progress Reports and Annual Reports are considered confidential and are accessible only to the designated NCOPE staff and members of NCOPE and its evaluating bodies. Written permission must be secured from the authorities of the educational institution prior to release of this information to any other individual or group, except when this released information does not disclose the identity of the educational institution.

During discussions related to review and evaluation of specific programs, strict safeguards of confidentiality are maintained. These meetings are closed and the minutes are kept confidential. Meetings may be open during discussion of general accreditation procedures. During open meetings, participants avoid references to specific programs by name or through elaborate descriptions.

Statistical summaries that do not specifically reveal information about individual programs may be disclosed. The Commission shall not be responsible for attempts to use general information disclosed by the Committee to identify specific programs.

Statement on Disclosure

Information regarding the Commission: The scope, policies, procedures and decisions of NCOPE are described in official documents and available to the public. Relevant policies and procedures are disseminated to educational programs on a regular basis.

Information relevant to decisions on accreditation status: NCOPE annually publishes a list of all educational programs accredited by NCOPE.

The definitions of the specific categories of accreditation are presented in the introduction to the listing as follows:

Developmental Accreditation:

The proposed program appears to meet the *Standards* if fully implemented in accordance with the plans of the sponsoring institution.

Accreditation:

The program is in substantial compliance with the *Standards*.

Probationary Accreditation:

At the occasion of its most recent review, the program was not in substantial compliance with one or more of the *Standards*.

Administrative Probationary Accreditation:

The program did/does not comply with one or more of the administrative requirements for maintaining accreditation (e.g., paying a fee or filing a report in a timely manner).

The listing does NOT specify which of the four categories applies to each individual program. Those programs on probation are included in the listing without differentiation from the other accredited programs, since probationary accreditation is an accreditation status.

If inquiries, written or verbal, are received regarding the accreditation status of a program, the inquirer is told:

1. whether the program is accredited,
2. the specific accreditation category,
3. the definition of the application accreditation category, and

4. the next review date.

If the status is Probationary Accreditation or Administrative Probationary Accreditation, the inquirer is referred to the program for further, current information regarding the reason(s) for the probation and the program's progress in addressing them.

In addition, effective 1/1/93, notice of all final actions of NCOPE regarding the status of educational programs will be published annually by NCOPE.

IV.C. Statement of Ethical Responsibilities and Conflict of Interest Guidelines

In carrying out their charge to protect the interest of the public through accreditation of educational programs in orthotics and prosthetics, members of NCOPE and the Roster of Accreditation Evaluators (RAE) must demonstrate that evaluations are conducted and decisions rendered under conditions that ensure an impartial and objective judgment.

Therefore, the following guidelines are to be applied to all paid staff of NCOPE, all members of NCOPE and all members of the RAE in making decisions regarding potential conflict of interest.

Statement of Ethical Responsibilities

Members of NCOPE and the RAE:

1. shall abide by the O&P Canons of Ethics.
2. shall act in ways to preserve the confidentiality of the personnel, students, programs and institutions that are evaluated.
3. may not serve on any other committee where a conflict exists or may appear to exist.
4. may not serve as a paid or unpaid consultant to an institution subject to NCOPE's accreditation on matters related to accreditation, unless such consultations are performed under the auspices of NCOPE or other official body or committee of NCOPE.
5. who have evaluated a program may not serve as a consultant, either paid or unpaid, to an institution or program for a period of two years from the date of the on-site evaluation or last official committee action related to the program's or institution's accreditation status.
6. shall expeditiously handle all matters pertaining to accreditation.

Responsibility for the decision regarding the existence of conflict of interest with any given educational program lies with the individual staff member, public member or evaluator. In making this decision, a staff member, public member or evaluator must consider the possibility of perceived conflict of interest as well as actual conflicts as defined by these conditions:

1. A close personal, professional or financial interest, or other special relationship, in any institution in question.
2. An employee or consultant to an entity, other than the institution under review or other consideration, that provides all or a significant portion of the institution's funding (e.g., a state department of education or a Federal or private agency providing significant grants or research funding).
3. A former or current student or graduate, or parent of a former student or graduate of the institution in question.
4. A former candidate for a paid position within the past five years with the entity in question.
5. A position, whether paid or voluntary, current or within the past five years, as a consultant, advisor, or clinical or adjunct faculty, to or for the institution in question.
6. A residence and/or place of employment in close proximity to the institution in question. Close proximity is determined by geographic, education and economic spheres (communities of interest) of influence rather than strict political boundaries.
7. A position, whether paid or voluntary, current or within the past five years, as a consultant, advisor, or clinical or adjunct faculty, in an institution that is generally viewed by peers and O&P students as a major competitor to the institution in question.

Members of NCOPE shall withdraw from participation in any formal or informal discussion or vote or other Commission proceedings on the institution in question should the members have, or have reason to believe, that others may reasonably perceive them as having a conflict of interest, unless responding to a direct inquiry from the Commission Chair. Members of NCOPE, with exception of paid staff, shall absent themselves from the Committee's deliberation on the institution in question if conditions #1, 5 or 6, above are applicable.

Members shall notify the Chair that a conflict exists, state the nature of the conflict and withdraw from participation or absent themselves from any further proceedings on the institution in question. The minutes of the official proceedings of the Commission shall note the member's notification to the Chair of the conflict and the subsequent withdrawal or absenting.

1. ***At the time of appointment:*** Upon notification of appointment to NCOPE or the RAE, the appointed member shall submit to NCOPE for keeping in its central office, a listing of all educational programs with which a conflict exists as determined by the criteria 1-7 above.
2. ***Subsequent to the appointment:*** During tenure as a member, a member shall advise as above, in writing, of the commencement of any new affiliation with a program that creates an additional conflict.

General

1. An NCOPE member or RAE may be excluded from serving as an on-site evaluator or reviewer by a program director (as one of five names that may be excluded without stated cause) even though the evaluator has not identified a conflict of interest according to the preceding criteria.
2. An evaluator is not prohibited from serving as an on-site evaluator at an institution evaluated previously, although such a selection is not encouraged.

IV.D. Inactive Status

Policy

Inactive status is a special status applied only to programs that are not currently enrolling new students.

The status "inactive" does not replace any other current accreditation status. The designation follows the regular accreditation status, e.g., Accreditation - Inactive. Students graduating from a program on inactive status are considered graduates of an accredited program.

A program may remain in inactive status for a maximum of two years. During that time, the program remains responsible for submission of the Annual Report to NCOPE and must pay the annual accreditation fee. A program may request reactivation at any time during the period of inactive status.

If the program chooses not to reactivate, the program may request Voluntary Withdrawal of Accreditation.

If a request is not received prior to the end of two years, the status will be changed to Involuntary Withdrawal of Accreditation.

Procedure

Written notification of intent to move to inactive status must be signed by the CEO of the institution and the program director and sent to:

National Commission on Orthotic and Prosthetic Education (NCOPE)
330 John Carlyle St., Suite 200
Alexandria, Virginia 22314
(703) 836-7114
fax (703) 836-0838

The two-year period begins on the date of receipt of this notification. At the end of the first year of inactive status, a letter will be sent to the program to inquire about plans to reactivate.

If the request for inactive status includes a request for delay of an on-site evaluation visit, the request for delay will be considered by NCOPE according to the procedure described in the Commission's Policy and Procedure for Delay of On-Site Evaluation." (See **Section III.C.**)

A request to reactivate accreditation must be submitted in writing (signed by the CEO and the program director) six months prior to the enrollment of students. A determination will be made at the time of the request regarding documentation and evaluation required (i.e., full self-study and on-site or brief report regarding current status) for reactivation. During the time between the request for reactivation and the final approval for reactivation, status will be designated as "Reactivating" (e.g., Probationary Accreditation - Reactivating).

IV.E. Sample Statements Regarding Accreditation Status

Sample statements regarding accreditation status and credentialing mechanisms

Developing O & P Programs

(Not yet accredited)

The Orthotic and Prosthetic Program has initiated accreditation procedures in conjunction with ABC and the Academy. Upon accreditation of the program, its graduates will be able to sit for the national registration examination for the orthotic and prosthetic practitioner administered by the American Board for Certification. After successful completion of this exam, the individual will be a registered orthotic and/or prosthetic practitioner.

The following is a sample of university/college catalog statements concerning accreditation and credentialing mechanisms for *established* programs:

Orthotic and Prosthetic Programs

The Orthotic and Prosthetic Practitioner Program is accredited by CAAHEP. Graduates of the program will be able to sit for the national registration examination for orthotic and prosthetic practitioners administered by the American Board for Certification. After successful completion of this exam, the individual will be a registered orthotic and/or prosthetic practitioner.