

- An inactive program may be reactivated only when the institution submits a request to the COA and the COA has taken action to reactivate the program. If the program standards under which the program was approved have been modified, or if new regulations have been added, the institution or program sponsor must address the updated standards before the program may be re-activated.

An inactive program may remain in inactive status for no longer than 5 years; after which, the program sponsor must determine whether the program should be withdrawn permanently or reactivated. If the institution does not request reactivation or withdrawal within the 5-year limit, the COA will withdraw the program at its next scheduled meeting. Commission staff will notify the program sponsor at least six months prior to the automatic withdrawal date.

Need to Update the Accreditation Handbook

There are two main issues. First, the section on Inactive programs needs to be updated to reflect some changes over time since the inception of this category. The second is that the category of inactive needs to be considered in light of institutions with stipulations.

These changes to the section of the *Handbook* related to Inactive programs includes the following:

- 1) Elimination of the need for institutions to submit a plan for candidates to complete the program. This step has been deemed unnecessary since candidates may be recommended while the program is on inactive status. Should the institution decide to withdraw the program, then there are safeguards to ensure that all candidates that have not finished the program are notified in advance of the impending closure of the program and given opportunities to complete the program.
- 2) Changing the language to recognize that inactive programs may recommend candidates during their inactive period. The candidates that may be recommended are limited to only those who were enrolled in the program prior to it being declared inactive. The language in the *Handbook* is no longer reflective of practice and was written many years ago. The Commission has since had successful implementation of the inactive status policy and this language should be changed to reflect updated practice.

The remainder of the language in the Handbook related to Inactive programs does not need to be changed.

Need to Address Institutions with Stipulations and Inactive Programs

Over the years, a new issue has arisen that requires Committee consideration and discussion. Some institutions with challenging issues identified by site visit teams have determined that the best way to address some of these concerns in the short term is to cease taking new candidates and to “pause” operations of the program where the issues were identified. This pause can be for a variety of reasons such as when the institution has determined it wants to restructure the program, wants to reassign personnel devoted to the program, or wants to reevaluate the institution’s commitment to operating the program in the future. There are many valid and

practical reasons for allowing such a pause in an institution's implementation of an approved program. That said, some of these issues remain unresolved for a year or more in contrast to the requirement that the institution address all stipulations within one year (unless the Committee has provided the institution with additional time).

The challenge occurs when the time period a program may be inactive (5 years) conflicts with the time period set forth for the requirement to address all stipulations (1 year). If the program is allowed to remain inactive for longer than one year and no candidates remain in the program, then it is difficult, if not impossible, to remove the stipulations that relate to that particular inactive program. However, allowing institutions to go beyond the one year requirement with stipulations in which they are not actively addressing them for their removal within one year presents a challenge in that it gives the impression that institutions are allowed to ignore areas of concern, when in fact, that is not the case if a program is not operating.

Because the Commission staff has encountered this on at least two occasions, it is important for the COA to discuss the possible options that could be put into place should this situation arise again in the future. Some possible options to consider:

- 1) Institutions with stipulations not be allowed to put any programs on inactive status.
- 2) Limit the time period for inactive status for institutions with stipulations to no more than one year after which either the stipulations are removed, the institution withdraws, or the program is withdrawn at the time that the stipulations should be addressed.
- 3) Allow the institution put the program on inactive status but require that the stipulation be address prior to allowing them to reactivate. If the stipulation is not addressed within the allowable 5 years, it would be automatically withdrawn. If a Focused Site Visit is required by the Committee to address the stipulation, the site visit would incur an Extraordinary Fee and need to take place prior to the request for reactivation.

Next Steps

As a result of the discussion, staff will draft an item for consideration at the February 2019 COA meeting for inclusion in the *Accreditation Handbook* that will address this topic.