

# Violations of the Accreditation Standards: How to File a Complaint

Any individual may contact the Council on Academic Accreditation (CAA) of the American Speech-Language-Hearing Association (ASHA) if they feel the Department of Communication Sciences and Disorders has violated or is not in compliance with any of the established accreditation standards. A complaint also may be made to the CAA that involves behavior that is in violation of ASHA's Code of Ethics. Please note that the CAA should not be contacted for the purpose of airing grievances of a general or unspecified nature. The CAA has specific guidelines established which must be followed. The guidelines are provided in the paragraphs below.

## Complaints Against Graduate Education Programs

A complaint about any accredited program or program in candidacy status may be submitted by any individual(s).

### *Criteria for Complaints*

Complaints about programs must meet all the following criteria:

- a. be against an accredited graduate education program or program in candidacy status in audiology or speech-language pathology;
- b. relate to the *Standards for Accreditation of Entry-Level Graduate Education Programs in Audiology and Speech-Language Pathology* in effect at the time that the conduct for the complaint occurred, including the relationship of the complaint to the accreditation standards;
- c. be clearly described, including the specific nature of the charge and the data to support the charge;
- d. be within the timelines specified below:
  - if the complaint is being filed by a graduate or former student, or a former faculty or staff member, the complaint must be filed within one year of separation\* from the program, even if the conduct occurred more than 4 years prior to the date of filing the complaint;
  - if the complaint is being filed by a current student or faculty member, the complaint must be filed as soon as possible, but no longer than 4 years after the date the conduct occurred;
  - if the complaint is being filed by other complainants, the conduct must have occurred at least in part within 4 years prior to the date the complaint is filed.

*\*Note: For graduates, former students, or former faculty or staff filing a complaint, the date of separation should be the date on which the individual was no longer considered a student in or employee of the graduate program (i.e., graduation, resignation, official notice of withdrawal or termination), and after any institutional grievance or other review processes have been concluded.*

Complaints also must meet the following submission requirements:

- a. include verification, if the complaint is from a student or faculty/instructional staff member, that the complainant exhausted all pertinent institutional grievance and review mechanisms before submitting a complaint to the CAA;
- b. include the complainant's name, address, and telephone contact information and the complainant's relationship to the program in order for the Accreditation Office staff to verify the source of the information;
- c. be submitted using the CAA's complaint form;
- d. must be complete at the time of submission, including the complaint and all appendices;
- e. append documented evidence in support of the complaint, including as appropriate relevant policies/procedures, relevant correspondence (including email), timelines of referenced events, etc. Complainants should not enclose entire documents; only the specific pages should be included that present content germane to the complaint. Page numbers to these appendices should be referenced in the complaint. Materials may be returned to the complainant if not properly organized to support the complaint.
- f. must submit all complaints and supporting evidence in English, consistent with the business practices of the CAA;
- g. be signed and submitted in writing via U.S. mail, overnight courier, or hand delivery—not via e-mail or as a facsimile—to:

*Chair, Council on Academic Accreditation in Audiology and Speech-Language Pathology  
American Speech-Language-Hearing Association  
2200 Research Boulevard, #310  
Rockville, MD 20850*

The complainant's burden of proof is a preponderance, or greater weight, of the evidence. These procedures do not prevent the CAA from considering a complaint against an accredited or candidate program if the program is involved in litigation or other actions by a third party.

## **Procedures:**

### ***Determination of Jurisdiction***

Within 15 days of receipt of the complaint, Accreditation Office staff will acknowledge receipt of the complaint and will forward a copy of the complaint, from which any information that would reveal the complainant's identity has been redacted, to the Executive Committee of the CAA. The original letter of complaint will be placed in an Accreditation Office file separate from the program's accreditation file.

The Executive Committee of the CAA will then consider and vote to determine whether the complaint meets the above criteria. An affirmative vote by two thirds of the voting members of the Executive Committee, exclusive of the Chair, is required to proceed with an investigation of a complaint.

If the Executive Committee of the CAA makes the determination that the complaint does not meet the above-listed criteria, the complainant will be informed within 30 days of the letter transmitting the complaint to the Executive Committee that the CAA will not investigate the complaint.

### ***Investigation of Complaint***

If the Executive Committee of the CAA determines that the complaint satisfies the above-listed criteria, the CAA will investigate the complaint. The CAA will base its review on the Standards for Accreditation in effect as of the date that the conduct which serves as the basis for the complaint occurred.

- a. The Chair of the CAA will inform the complainant within 30 days of the letter transmitting the complaint to the Executive Committee that the Council will proceed with an investigation. Because it may be necessary to reveal the identity of the complainant to the affected program or to other potential sources of relevant information, the complainant will be required to sign a waiver of confidentiality within 30 days of the letter indicating that the CAA will proceed with its investigation. The complainant will be given the opportunity to withdraw the complaint during that time. If the complainant does not wish to pursue the matter, the investigation will be concluded. As noted above, if the complainant does not wish to withdraw the complaint, the complainant will be asked to keep the initiation of an investigation confidential by signing the waiver.

- b. Within 15 days of receipt of the waiver of confidentiality or after the 30-day period for withdrawing the complaint has elapsed, if the waiver was submitted with the complaint, the Chair of the CAA will notify the program director and the institution's president or president's designee by certified return receipt mail that a complaint has been registered against the program. The notification will include a copy of the complaint from which the name of the complainant has been redacted. The CAA will require the program to respond within 10 days of the letter forwarding the complaint as to whether it intends to provide complete responsive information and supporting documentation considered relevant to the complaint. The CAA may draw reasonable inferences from a program's failure to provide a response to the complaint. The program must respond to all the specific elements identified in the complaint and describe how the program addressed the concerns with the complainant. The formal complaint response will be due 45 days from the date of the notification letter. The institution's president or president's designee may contribute to the response.

The program may request an extension to file its response if extenuating circumstances exist by making a formal request in writing to the Accreditation Office no later than the original due date. The extension request must include the rationale for the request, a detailed description of the progress made to develop its response, and an estimate of the additional time needed that may not extend beyond 45 additional days from the original due date. The CAA's Executive Committee will review the information in making its decision whether to grant an extension.

- c. Within 15 days of receipt of the program's response to the complaint, the Chair of the CAA will forward the complaint and the program's response to the complaint to the CAA. The identity of the complainant will not be revealed to the members of the CAA or to recipients of requests for information unless a majority of CAA members consider such disclosure necessary for the proper investigation of the complaint.

If the majority of Council members conclude that individuals other than the complainant, the program director, and the institution's president or president's designee may have information relevant to the complaint, the Chair of the CAA will request such information. All conflict-of-interest policies and voting protocols regarding the CAA members' participation and voting on complaints also will apply to these complaint procedures.

- d. After reviewing the complaint, the program's response to the complaint and other information requested by the CAA Chair as referenced above, the CAA will determine its course of action within 30 days. Such actions include, but are not limited to, the following:
- dismiss the complaint,
  - recommend changes in the program to be implemented within a specified period of time (except for those areas that are solely within the purview of the institution),
  - continue the investigation through a focused site visit to the program,
  - place the program on probation,
  - withhold/withdraw accreditation.
- e. If the CAA determines that a site visit is necessary, the program director and the institution's president or president's designee will be notified, and a date for the site visit will be scheduled expeditiously. The program is responsible for payment or reimbursement of reasonable expenses associated with the site visit. The site visit team is selected from the current roster of CAA site visitors and includes the required composition of all typical site visit teams. During the site visit, consideration is given only to those Standards with which the program is allegedly not in compliance.

The site visit team will submit a written report to the CAA no later than 30 days following the site visit. As with all other site visits, only the observations of the site visitors will be reported; site visitors will not make accreditation recommendations. The CAA will forward the report to the program director and the institution's president or president's designee within 15 days of receiving the report from the site visit team. The program or institution shall be given 30 days from the date on which the report is postmarked to the program director and the president or president's designee to provide a written response to the Chair of the CAA. The purpose of the response is to comment on the accuracy of the site visit report and respond to it.

- f. The CAA will review the complaint, the program's response to the complaint, and other information requested by the CAA Chair as referenced above, including the site visit report and the program's response to the report, and will take one of the following actions within 21 days of receipt of the program's response:

- dismiss the complaint,
  - recommend modifications of the program to be implemented within a specified period of time (except for those areas that are solely within the purview of the institution),
  - place the program on probation,
  - withhold/withdraw accreditation.
- g. If the CAA withholds or withdraws accreditation, the program director and the institution's president or president's designee will be informed within 15 days of the CAA decision that accreditation has been withheld or withdrawn. That notification will also include a statement describing the justification for the decision and shall inform the program of its option to request Further Consideration. *Further Consideration* is the mechanism whereby the program can present documentary evidence of compliance with the appropriate Standards and ask the CAA to reevaluate its decision to withhold/withdraw accreditation.
- h. If the program does not exercise its Further Consideration option in a timely manner, the CAA's decision to withhold or withdraw accreditation will be final, and no further appeal may be taken. If accreditation is withheld or withdrawn, the Chair of the CAA will notify the Secretary of the U.S. Department of Education at the same time it notifies the program of the decision, consistent with the CAA's *Public Notice of Accreditation Actions* policy.
- i. If the program chooses to request Further Consideration, the CAA must receive the request within 30 days from the date of the notification letter. With the request for Further Consideration, the program must submit additional written documentation to justify why accreditation should not be withheld or withdrawn. No hearing shall occur in connection with Further Consideration requests. The CAA will evaluate the request for Further Consideration and take one of the following actions within 30 days:
- recommend modifications of the program to be implemented within a specified period of time (except for those areas that are solely within the purview of the institution),
  - place the program on probation,
  - withhold/withdraw accreditation.
- j. Within 15 days of its decision, the CAA will notify the program and the complainant of its decision.

- k. If the CAA decision after Further Consideration is to withhold or withdraw accreditation, the program may appeal the decision in accord with the appeal procedures described herein.

### ***Summary of Timelines***

The following summarizes the timelines in the complaint process, beginning from the date a complaint is received.

- The complaint is acknowledged within 15 days of receipt and forwarded to the CAA Executive Committee.
- If the Executive Committee determines that the complaint does not meet criteria for complaints, the complainant is informed within 30 days that the CAA will not investigate.
- If the Executive Committee determines that the complaint meets criteria, the complainant is informed within 30 days of the determination that the CAA will proceed with investigation.
- The complainant is given 30 days to sign a waiver of confidentiality or withdraw the complaint.
- Within 15 days of receipt of the waiver of confidentiality, the complaint is sent to the program for a response, which must be submitted within 45 days. The program must submit its notice within 10 days of notification of the complaint whether it plans to file a response.
- Within 15 days of receipt of the program's response, the Chair forwards the complaint and program response to the CAA for review.
- Within 30 days, the CAA determines a course of action.
- If the CAA determines that a site visit is necessary, the visit is scheduled and the site visit team submits a report to the CAA within 30 days of visit.
- Within 15 days, the site visit report is forwarded to the program for its response within 30 days.
- The CAA takes action within 21 days of the program's response.
- If the CAA withholds/withdraws accreditation, the program is notified within 15 days of the CAA's decision.
- The program has 30 days to request Further Consideration.
- If the program does not request Further Consideration, the decision is final and the CAA notifies the Secretary of U.S. Department of Education (ED); if program timely requests Further Consideration, the CAA takes action within 30 days.

- The CAA informs the program and the complainant within 15 days of the decision following Further Consideration.