On April 25, 2023, the Commission on Accreditation in Physical Therapy Education made the following decision regarding the physical therapy education program at Howard University.

**Status:** PROBATIONARY ACCREDITATION

**Action Taken:** Continue Probationary Accreditation

**Effective Date:** April 25, 2023

**Information Used to Make Decisions:** Compliance Report

**Reason for Decision:** The Commission based its decision to continue probationary accreditation due to the program's continued inability to demonstrate compliance with the Standards and Required Elements.

The program was judged to be out of compliance with the following required elements: **1C2** and **2B3**.

When a program is on probation, the Commission may withdraw accreditation at any time if warranted by program conditions. Therefore, the program is advised to develop a contingency plan for students who are accepted into the next class. If accreditation is withdrawn at the next meeting, and after all due process has been exhausted without the decision being reversed, only those students who are enrolled in the final year of the program will be considered graduates of an accredited program. Those students must successfully complete the program in the original timeframe scheduled for their graduation, i.e., the twelve month period following the date of the Commission action to withdraw accreditation.

The Commission's decision was also based on the belief that the program will bring the areas of deficiency noted in the Summary of Action into compliance. That compliance must be appropriately documented in a Compliance Report which will be used by the Commission to determine compliance with the elements noted in the Findings and to monitor compliance with all the required elements.

**Next Activity:** Compliance Report due September 1, 2023
NOTICES

NOTIFICATION OF STUDENTS AND THE PUBLIC
It is the obligation of the institution to notify the students enrolled in the physical therapist [assistant] education program, those seeking admission and the public, that the program has been granted probationary accreditation until such time as probation is removed. A sample memorandum to students accompanies this Summary of Action. A copy of the actual memorandum sent by the program and a list of the individuals to whom it was sent must be provided to the Accreditation staff within thirty (30) days of receipt of this Summary of Action along with information about how the public is being notified.

REQUIRED STATEMENT OF PROBATIONARY STATUS
Once a program has been placed on probation, and for as long as it remains on probation, the program must use the statement provided in §8.20(a)(3) on all educational and promotional materials, including the institution/program web site, used by the program/institution.

[INSERT Name of Program] at [INSERT Name of Institution] is accredited by the Commission on Accreditation in Physical Therapy Education (CAPTE), 3030 Potomac Ave., Suite 100, Alexandria, Virginia 22305-3085; telephone: 703-706-3245; email: accreditation@apta.org; website: http://www.capteonline.org. The program’s current status is probationary accreditation; for more information see https://www.capteonline.org/about-capte/recent-actions-and-updates/recent-actions. If needing to contact the program/institution directly, please call [INSERT Direct Program Phone Number] or email [INSERT Direct Program Email Address].

CONTINGENCY PLAN
The program is advised to consider development of a contingency plan for students who are accepted into the next class. If the program is unable to address the issues identified in this Summary of Action and accreditation is withdrawn, and after all due process has been exhausted, the decision has not been reversed, only those students who are enrolled in the final year of the program will be considered graduates of an accredited program. Those students must successfully complete the program in the original time frame scheduled for their graduation, i.e., the twelve-month period following the date of the action to withdraw accreditation.

PUBLIC NOTICE OF REASONS FOR PROBATION
In accordance with USDE requirements, no later than sixty (60) days after the date of any decision to place or maintain a program on probation, CAPTE will publish on its web site a brief statement summarizing the reasons for the decision and the official comments, if any, that the program may make with regard to the decision. A copy of what we intend to publish is enclosed with this summary of action. Acknowledgement that the institution has reviewed the intended public notice must be received by the Accreditation staff no later than fourteen (14) days following receipt of the decision, along with the official comments from the program or institution in regard to the decision, if any. Notices related to programs on probation will be removed from the website when probation is no longer in effect.

TWO YEAR LIMITATION ON BEING OUT OF COMPLIANCE
CAPTE’s recognition by the United States Department of Education requires a limitation of two years for programs to be out of compliance with a required element [34 CFR 602.20(a)(2)(iii)]. When, after review of a Compliance Report, the program remains out of compliance with any required element and sufficient progress toward compliance has not been demonstrated, CAPTE may act to place the program on probationary accreditation or withdraw accreditation. CAPTE will place the program on probationary accreditation when a program remains out of compliance for 18 months. If the program continues to be
out of compliance with any required element at the end of the two year period following the initial finding that the program is out of compliance, CAPTE will withdraw accreditation unless CAPTE judges the program, for good cause, to be making significant efforts to come into compliance with the standards and required elements. CAPTE defines a good cause effort as:

(a) a completed comprehensive assessment of the problem/issue under review,
(b) an appropriate plan for achieving compliance within a reasonable time frame not to exceed two years,
(c) a detailed timeline for completion of the plan,
(d) evidence that the plan has been implemented according to the established timeline, and
(e) evidence that the implemented plan is showing results that provide reasonable assurance the program will achieve compliance within the allotted time frame.

It is the program’s responsibility to make the case that a good cause effort has been made and continues to be in effect. During the extension for good cause, probationary accreditation status will be maintained and the program’s progress will be monitored. In no case, however, will an extension for good cause be longer than two years.

**ACCURATE PUBLIC DISCLOSURE OF THIS DECISION BY THE INSTITUTION**

The institution and program must make accurate public disclosure of the accreditation or pre-accreditation status awarded to the program. Further, the United States Department of Education (USDE) requires all recognized accrediting agencies to provide for the public correction of incorrect or misleading information an institution or program releases about accreditation or pre-accreditation status, contents of reports of on-site reviews, and accreditation or pre-accreditation actions with respect to the institution or program [34 CFR 602.23(d) and 602.23(e)]. If the institution or program chooses to disclose any additional information, beyond the accreditation or pre-accreditation status that is within the scope of the USDE rule, such disclosure also must be accurate. Any public disclosure of information within the scope of the rule must include the agency’s street address, email address and phone number: Commission on Accreditation in Physical Therapy Education, 3030 Potomac Ave., Suite 100, Alexandria, Virginia 22305-3085; accreditation@apta.org; (703) 684-2782 or (703) 706-3245. If the Accreditation staff finds that an institution or program has released incorrect or misleading information within the scope of the USDE rule, then, acting on behalf of CAPTE the Accreditation staff will make public correction, and reserves the right to disclose this Summary of Action in its entirety for that purpose.

**PUBLIC NOTICE OF DECISIONS BY CAPTE**

Following all decisions, including decisions to place a program on warning, probation or show cause, or to deny candidacy, withdraw candidacy, withhold accreditation, or withdraw accreditation, the Accreditation staff will, within 24 hours of the official notification of the programs and institutions of the decisions, provide notice to the public by placing notice of the decisions on its web site.

**RESPONSIBILITY TO REPORT CHANGE(S)**

The institution and program are responsible for notifying CAPTE of all reportable changes in the program prior to implementation. Unexpected changes are to be reported immediately after they occur. Reportable changes, some of which may require pre-approval, are described in Part 9 of CAPTE’s *Rules of Practice and Procedure* (https://www.captoonline.org/globalassets/capte-docs/capte-rules-practice-procedure.pdf). It is the program’s responsibility to be familiar with these expectations and to provide notification of program changes as required.
Commission’s Findings and Reasons for Decision:

The program was judged to be in NON-COMPLIANCE with the following required elements. Non-compliance means that the program has in place less than a substantial portion of the components necessary to meet all aspects of the elements.

1. **1C2**: Ultimate licensure pass rates are at least 85%, averaged over two years. When two years of data are not available, the one-year ultimate rate must be sufficient to allow the program to meet the expectation for an ultimate two-year licensure pass rate of at least 85%.

**INSTITUTION RESPONSE:**

The program was judged to be in CONDITIONAL COMPLIANCE with the following required elements. Conditional compliance means that the program has in place a substantial portion, but not all, of the components necessary to meet all aspects of the elements.

1. **2B3**: [For each of the following, the program provides an analysis of relevant data and identifies needed program change(s) with timelines for implementation and reassessment. The assessment process is used to determine the extent to which]: the collective core, associated and clinical education faculty meet program and curricular needs.

**INSTITUTION RESPONSE:**

Consultative Comment:

1. In the Compliance Report submitted on March 1, 2023, the program described how they use Content Area Reports as part of their assessment process to determine the extent to which faculty meet program and curricular needs. The program described in more detail the criteria/benchmark used to assess course instructors, “… if the average score in subject and content areas for the PEAT and NPTE is less than 600, the course instructor is deemed to have been less than effective in teaching and assessing students in the specific content area, as these areas on the examination are mapped back to courses and content objectives per CAPTE standards.”

Given that Content Area Scores of 600 represents passing, the program would interpret a score of 600 as evidence of effective student teaching and assessment of the faculty responsible for the content in question. However, a mean score of 600, for normally distributed data, indicates that approximately half of the cohort scored below 600 which is failing and that approximately half of the cohort scored above 600 which is passing. Therefore, the Commission recommends that the program reconsider why it uses Content Area mean scores of 600 as a benchmark for determining the effectiveness of faculty when this score corresponds to approximately 50% of the class failing. (ELEMENT 2B3)