**SUMMARY OF CHANGES TO**

**CPME 120 *Standards and Requirements for Accrediting Colleges of Podiatric Medicine,* CPME 130 *Procedures for Accrediting Colleges of Podiatric Medicine,* CPME 935a *Guidelines for the Conduct of Appeals and Arbitration by Colleges of Podiatric Medicine, and* CPME 935b *Guidelines for the Conduct of Appeals and Arbitration by Residencies, Fellowships, Providers of Continuing Education, and Specialty Boards***

**APRIL 2021**

 In 2019, the Department of Education engaged in negotiated rulemaking around several issues and finalized revisions to the regulations in July 2020. As a result of these revisions, the Council has incorporated these changes to comply with the new regulations within CPME 120 *Standards and Requirements for Accrediting Colleges of Podiatric Medicine,* CPME 130 *Procedures for Accrediting Colleges of Podiatric Medicine,* and CPME 935a *Guidelines for the Conduct of Appeals and Arbitration by Colleges of Podiatric Medicine.* (Due to the revisions made to CPME 935a based on the USDE regulatory changes, the Council determined that similar changes should be made to CPME 935b *Guidelines for the Conduct of Appeals and Arbitration by Residencies, Fellowships, Providers of Continuing Education, and Specialty Boards*.)

 Per the Council procedures, these documents will be open for comment from the community of interest **until August 20, 2021**. To review the revisions to CPME 120, CPME 130, CPME 935a, and CPME 935b, please visit the “News” section of [www.cpme.org](http://www.cpme.org). The draft documents are slated for adoption at the Council’s October 2021 meeting.

 The following revisions are proposed to ensure that the CPME documents properly align with the new USDE regulations:

 **Revisions to CPME 935a** to comply with regulatory changes:

* Corrected errors in the document that referred to “reconsideration”. Reconsideration is only applicable to residencies, fellowships, and providers of continuing education.
* Information concerning the newly created pool of potential appeal panelists.
* Added an arbitration policy to CPME 935a (pages 7-11)
* Addition of venue of claim or proceeding (page 11) – not a regulatory requirement but added by the Council after consultation with legal counsel.

 **Revisions to CPME 935b** (due to the revisions made to CPME 935a based on the USDE regulatory changes, the Council determined that similar changes should be made to CPME 935b)**:**

* Added an arbitration policy to CPME 935b (pages 8-12)
* Addition of venue of claim or proceeding (pages 12-13) – added by the Council after consultation with legal counsel.

 **Revisions to CPME 120** to comply with regulatory changes (pages 46-49):

 Adding definitions for accredited, additional location, final accrediting action, teach-out, teach-out agreement, teach-out plan.

 **Accredited:**The status of public recognition that a nationally recognized accrediting agency grants to an institution or educational program that meets the agency's established requirements.

 **Additional location:**A facility that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of a program and may qualify as a branch campus.

 **Final Accrediting Action:**A final determination by the Council regarding the accreditation or provisional accreditation status of an institution or college. A final accrediting action is a decision made by the Council at the conclusion of any appeals process available to the institution or college under the Council's due process policies and procedures.

 **Teach-out**: A process during which a program, institution, or institutional location that provides 100 percent of at least one program engages in an orderly closure or when, following the closure of an institution or campus, another institution provides an opportunity for the students of the closed school to complete their program, regardless of their academic progress at the time of closure.

 **Teach-out agreement**: A written agreement between institutions that provides for the equitable treatment of students and a reasonable opportunity for students to complete their program of study if an institution, or an institutional location that provides 100 percent of at least one program offered, ceases to operate or plans to cease operations before all enrolled students have completed their program of study.

 **Teach-out plan**: A written plan developed by an institution that provides for the equitable treatment of students if an institution, or an institutional location that provides 100 percent of at least one program, ceases to operate or plans to cease operations before all enrolled students have completed their program of study.

* On page 20 provided clarification as to the rule that the podiatric medical curriculum must require a minimum of four years of academic study with at least 30 academic weeks in each academic year and must be **completed in a maximum of six enrolled academic years** in the podiatric medical program.

 **Revisions to CPME 130 to comply with regulatory changes**:

* The Department states that because it holds all accrediting agencies to the same standards, distinctions between regional and national accrediting agencies are unfounded and thus, were removed from the USDE regulations. The Department now distinguishes only between institutional and programmatic accrediting agencies. CPME 130 has been updated to change “regional accrediting agency” to “nationally recognized institutional accrediting agency” throughout the document to comply with this change.
* Replaces the term “provisional accreditation” with “preaccreditation” throughout the CPME college documents to better align with the USDE language and definitions.
* Proposal to change the call for comment period from 3 months to 60 days.
* Deletion of the sentence on page 4 which states, “The Ad Hoc Advisory Committee holds at least two face-to-face meetings” as that level of detail is unnecessary; The Ad Hoc Advisory Committee will make their own determination as to the number of meetings necessary to complete their charge of revising the Council documents.
* Inclusion of the requirement of teach-out plans at the candidacy stage to increase protection of students.
* Inclusion of the requirement of teach-out plans for all new schools/colleges of podiatric medicine, not just those where CPME serves as the institutional accreditor.
* Allows for adverse accreditation actions currently sent by certified mail to be sent by “electronic notice” instead (see page 19).
* Changes to the **Substantive Modifications** section (pages 21-30)
	+ The department added language to clarify substantive change #1: Substantial change in the established educational mission or objectives of the college.
	+ The department replaced “A change in clock hours to credit hours or vice versa” with “Change in the way student progress is measured, including whether progress is measured in clock hours, credit-hours, semesters, trimesters, or quarters, or usestime-based or non-time-based methods.”
	+ The department changed how substantive modification #8 is measured to clarify that contracting with non-title IV certified institutions to provide greater than 25 and up to 50 percent of a college’s educational program. This also includes a provision that the Council will make a final decision within 90 days of receipt of a materially complete request, unless the Council or its staff determine significant circumstances related to the substantive change require a review by the Council’s decision-making body in which a final decision will be made within 180 days.
	+ The department increased the accreditor’s role in oversight of substantive modification #11 – Establishment of a new location or branch campus. Added in that the college’s fiscal and administrative capability to operate the location or branch campus and long-range planning for expansion. Added that the school must address the following: Clearly identified academic control; Adequate faculty, facilities, resources, and academic and student support systems in place; and the college is financially stable.
* **Teach-Out Plans** (pages 34-37)
* The department added guidance concerning institutional accreditors and the use of teach-out plans that must be added to CPME’s policies to protect students in cases where a school must shut down (e.g., natural disasters, instability). This includes what should be included within a teach-out agreement. CPME determined that this rule will be added for all new programs/colleges (not just those where CPME serves as the institutional accreditor) to protect students at the candidacy stage.
* **Student Privacy** (page 38)
	+ A USDE requirement for the colleges.
* **Disclosures** (pages 38-39)
	+ The department changed the disclosure timeline to one business day instead of 24 hours and that colleges must disclose adverse actions within seven business days of receipt to all current and prospective students.
	+ For withdrawal or lapses of accreditation, the Council must now notify the US Secretary of Education, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public within 10 days (instead of 30 days) of receiving notification from the college if it has decided to withdraw voluntarily from candidate status, provisional accreditation, or accreditation.
	+ The Council will notify the US Secretary of Education, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public within 10 days (instead of 30 days) of the date on which provisional accreditation or accreditation lapses if the college notifies the Council that it will not request renewal of its provisional accreditation or accreditation status.
* **Assessment of Team and Evaluator Effectiveness** (page 42)
	+ This information was duplicated elsewhere in the document and is included in “Training and Assessment of Team and Evaluator Effectiveness” on pages 48-49.

* **Fees Related to On-Stie Evaluations** (page 43)
	+ - Removed reference to honorarium paid to generalist educator on the on-site evaluation team to ensure there is no perceived conflict of interest or perception that CPME volunteers are being paid for their services.
* **Enforcement of standards** (pages 46-47)
	+ - * The department now stipulates that the Council will provide a written timeline for schools to come into compliance based on the nature of the finding, the stated mission, and educational objectives of the college and that the Council may maintain the college’s accreditation status until the college has had reasonable time to complete the activities in its teach-out agreement to assist students in transferring or completing their programs.