U.S. Department of Education

Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues

RECOMMENDATION PAGE

1. **Agency:** Council on Accreditation of Nurse Anesthesia Educational Programs (1955/2007)
   (The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)

2. **Action Item:** Interim Report

3. **Current Scope of Recognition:** The accreditation of institutions and programs of nurse anesthesia within the United States at the post master's certificate, master's, or doctoral degree levels, including programs offering distance education.

4. **Requested Scope of Recognition:** Same as above.

5. **Date of Advisory Committee Meeting:** December, 2010

6. **Staff Recommendation:** Accept the report.

7. **Issues or Problems:** None

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Council on Accreditation of Nurse Anesthesia Educational Programs (COA)accredits institutions and programs that prepare nurses to become practicing nurse anesthetists. Currently the agency accredits 105 programs located in 35 states, the District of Columbia and Puerto Rico, including three single purpose freestanding institutions.

The agency's accredited hospital-based programs and institutions participate in Title IV, HEA programs and therefore the agency must meet the Secretary's separate and independent requirements or seek a wavier. Accredited programs also use the agency's recognition to participate in non-HEA programs that include the Department of Health and Human Services grants in advanced nurse education and eligibility to participate in the U.S. Army Nurse Corps and in the U.S. Department of Defense programs.

Recognition History

The COA is both a programmatic and institutional accrediting agency. Nurse anesthesia programs have been accredited since 1952. At that time, accrediting activities were conducted by the Committee on Accreditation of the American Association of Nurse Anesthetists (AANA).

The AANA was first recognized as a national accrediting agency in 1955. The accrediting activities of AANA were transferred in 1975 to a new semiautonomous Council on Accreditation (COA) of Nurse Anesthesia Educational Programs. It was this organization that was reviewed for recognition in 1976 as the agency that accredits nurse anesthesia programs. The COA became an autonomous body in 1978.

The agency's most recent full review for recognition was in the spring of 2007, at which time the agency's recognition was renewed for a period of five years and it was granted an expansion of its scope of recognition to include distance education. At the same time the NACIQI requested that the agency provide an interim report, by May 31, 2008, addressing the COA's need to provide evidence of the Council's adoption of its revised annual report policies and procedures for monitoring its programs' compliance with its student achievement standards. While the COA was scheduled to appear before the NACIQI in the fall of 2008, due to the passage of HEOA, the NACIQI did not meet. In January 2010, as a result of new regulations effective July 1, 2010, the agency was requested to update its interim report and to also address the new regulatory requirements of 602.19. The updated interim report is the subject of this analysis.

PART II: SUMMARY OF FINDINGS

§602.19 Monitoring and reevaluation of accredited institutions and programs.

> **(b) The agency must demonstrate it has, and effectively applies, a set of monitoring and evaluation approaches that enables the agency to identify problems with an institution's or program's continued compliance with agency standards and that takes into account institutional or program strengths and stability. These approaches must include periodic reports, and collection and analysis of key data and indicators, identified by the agency, including, but not limited to, fiscal information and measures of student achievement, consistent with the provisions of §602.16(f). This provision does not require institutions or programs to provide annual reports on each specific accreditation criterion.**

Previous Issue or Problem:
During the spring 2007 review of the agency's petition for continued recognition, the Department staff acknowledged that the agency had taken significant steps to strengthen its monitoring of accredited programs by establishing written policies and procedures that document the agency's monitoring process including using its annual report for its monitoring of program attrition and graduate employment rates. Department staff concluded, that in order to verify the agency's adoption of the new policies and the implementation of its revised annual report process for monitoring its programs' compliance with its student achievement standards, the agency needed to provide a compliance report documenting implementation of these initiatives to be reviewed by NACIQI at its fall 2008 meeting. However, in August 2008, the HEOA was enacted and NACIQI meetings were not held pending the constitution of a new NACIQI.

Agency Response and Discussion:
COA's policies and procedures were adopted by the Council in May 2010 to reflect compliance with the new regulatory requirements for §602.19(b) effective July 1, 2010. The agency also provided a sample annual report that demonstrates that the agency collects information regarding a number of key indicators to include student outcomes and fiscal information as well as enrollment, faculty, and program self assessment of its strengths and continuous improvement planning. However, though the agency requires programs to continuously monitor their indicators of success and are expected to use the information to demonstrate the program's ability to meet agency standards and to determine the need for change that will improve and/or enhance student achievement and/or program outcomes, the agency has not provided evidence of its assessment of the report data provided to it by the program. It is still not clear to Department staff how the agency evaluates the data provided by the program, such as student achievement and financial data ,to assess a program in context of compliance with the agency's standards. Neither is it clear from agency documents whether the agency monitors and assesses student outcome information and continuing compliance with its standards from annual reports and other evaluation instruments or, as the agency states in its Plans for Purposeful Change and Needed Improvement policy document, the "Council judges a program's success with respect to student achievement and program effectiveness during programmatic review" and not at other times. The agency has not made it clear how it will monitor the success of programs' efforts to improve effectiveness and student achievement through the periodic report process.

The agency does not meet the requirements of this section. The agency needs to provide evidence of the Council's review and evaluation and continuous monitoring of its programs' compliance with its standards.

Analyst Remarks to Response:

In response to the draft staff analysis the COA demonstrated that the information and data it receives via a variety of reports is reviewed and assessed by the Selection and Evaluation committee and the COA as documented by meeting minutes and various communications to programs when it identifies a concern that the program may be or is out of compliance with its standards.

Staff Determination: The agency meets the requirements of this section of the Criteria.

(c) Each agency must monitor overall growth of the institutions or programs it accredits and, at least annually, collect headcount enrollment data from those institutions or programs.

COA provided a copy of an annual report that verified that this information is required and collected. However, the agency provided no evidence of its procedures/process for monitoring and follow-on action, as appropriate. The agency does not meet the requirements of this section.It must provide evidence of its effective application of its process/procedures for monitoring overall growth of its accredited programs.

Analyst Remarks to Response:

In its response, the agency provided evidence of its collection of key data indicators in annual reports, self studies and site evaluation team reports. The agency also provided minutes from a decision meeting verifying the review and evaluation of headcount data collected from its accredited programs. Letters provided verify that the agency is proactive in following up on quality issues relevant to increases in enrollment i.e., the sufficiency of resources including clinical sites and faculty.

Staff Determination: The agency meets the requirements of this section of the Criteria.

(e) Any agency that has notified the Secretary of a change in its scope in accordance with §602.27(a)(5) must monitor the headcount enrollment of each institution it has accredited that offers distance education or correspondence education. If any such institution has experienced an increase in headcount enrollment of 50 percent or more within one institutional fiscal year, the agency must report that information to the Secretary within 30 days of acquiring such data.

Analyst Remarks to Response:

The agency did not need to respond to this section of the criteria.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third-party comments regarding this agency.