

July 25, 2022

Michael Bamdad, President, CAPCSD Board of Directors
Council of Academic Programs in Communication Sciences and Disorders
5490 Parmalee Gulch Road
P.O. Box 929
Indian Hills, CO 80454

Dear Mr. Bamdad,

On behalf of the Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA), I would like to thank you for your patience in response to your letter sent to the CAA on April 5, 2022. Between our February 2022 and July 2022 CAA Meetings, the Council discussed your letter in addition to other issues related to Standard 1.8 and its anti-discrimination policies. I'm writing today to respond to your questions and to clarify the position of the CAA on the concerns you noted.

As an initial matter, I want to emphasize that the CAA believes its policies on non-discrimination are critically important and fundamental to the CAA's mission. The CAA is a semi-autonomous body within the American Speech-Language-Hearing Association (ASHA), and remains autonomous in the development of accreditation standards, in the establishment and implementation of policies and procedures, and in making its accreditation decisions as a requirement in the criteria for our external recognition.

The CAA acknowledges that an institution may be eligible for a waiver from applicable laws, regulations, and executive orders, and therefore specifies within its standard that programs must have written policies, advise affected groups, and consistently enforce these policies and procedures. The CAA is responsible for accrediting academic programs within educational institutions, and some of those institutions may have exemptions or qualify exemptions from federal laws. In particular, as noted in the *Accreditation Handbook*, the CAA requires programs that are housed in institutions that may qualify for exemption from any federal antidiscrimination requirements (such as those contained in Title IX) based on the institution's religious tenets to provide documentation of any exemption requests the institution has made to the U.S. Department of Education (USDE). Specifically, a program must provide all documents submitted to the USDE and all documents relating to the response it received from the USDE so that the CAA can determine whether the program qualifies for an exemption from the non-discrimination policy requirements set forth in the CAA's Standards for Accreditation. If a program believes that it is entitled to an exemption from a non-discrimination policy requirement in the CAA's Standards for Accreditation but has not yet submitted a request for an exemption to the USDE, then the program must submit a written statement detailing why it believes it should be exempt from the antidiscrimination requirement based on the religious tenets of the institution. All exemption requests are assessed by the CAA on a case-by-case basis in accordance with applicable law.

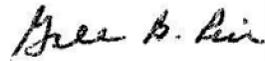
Regarding the relationship between the CAA's Standards for Accreditation and the ASHA Code of Ethics, the CAA is separate from the ASHA Board of Ethics (BOE) and does not enforce or monitor violations with any federal, local, or organizational code of ethics. ASHA's Code of Ethics applies to individuals who are ASHA members and individuals who hold the Certificate of Clinical Competence (CCC). The ASHA Code of Ethics does not apply to academic programs or institutions. Only the BOE may determine if a complaint

issued against an individual gives rise to a violation. As such, the CAA does not have the authority to enforce the ASHA Code of Ethics. Instead, the CAA evaluates programs within accredited institutions according to the CAA's Standards for Accreditation.

The CAA, as a part of our policies and procedures, consistently monitors the accreditation process and identifies needs for recalibration of standards and their interpretation regularly. The Council recognizes the need for ongoing conversations around consistent implementation of accreditation standards and we appreciate you sharing the thoughts of your member programs with us.

If you have any further comments or questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Gale B. Rice". The signature is written in a cursive style.

Gale Rice, Chair
Council on Academic Accreditation in Audiology and Speech-Language Pathology

cc: Kimberlee Moore, ASHA Chief Accreditation Officer