XIII. COMPLAINTS

A. 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 of the following criteria:

- a. be against an accredited graduate education program or program in candidacy status in audiology or speech-language pathology;
 - relate to the <u>Standards for Accreditation of Entry-Level Graduate Education Programs in Audiology and Speech-Language Pathology</u> [PDF] in effect at the time that the conduct for the complaint occurred¹¹, 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:

- 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 [DOC]
- d. sign and submit a waiver of confidentiality with the complaint; Because it may be necessary to identify the complainant to the affected program or to other potential sources of relevant information, the complainant is required to sign a waiver of confidentiality as part of the complaint submission. Failure to provide a signed waiver of confidentiality will result in dismissal of the complaint;
- e. must be complete at the time of submission, including the complaint, waiver, and all appendices; If a complainant submits an amended complaint, including providing additional appendices, it will void the original submission and initiate a new process and time line:
- f. 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.
- g. must submit all complaints and supporting evidence in English, consistent with the business

¹¹ Copies of past Standards for Accreditation may be requested by contacting the Accreditation Office.

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practices of the CAA;

h. 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. The complainant will be given the opportunity to withdraw the complaint within 30 days of being notified. If the complainant does not wish to pursue the matter and withdraws the complaint, the investigation will be concluded. If the complainant does not wish to withdraw the complaint, the complainant will be advised to keep the initiation of an investigation confidential.
- b. Within 15 days of the complainant confirming their wish to proceed with investigation or after the 30-day period for withdrawing the complaint has elapsed, 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 or not 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 of 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 CAA Accreditation Handbook – page 68

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. Once the decision is final, the program would no longer hold an accreditation status, including applicant, effective at the end of the academic term following the date of notification. If the program seeking initial accreditation does not hold an accreditation status, e.g., candidacy, the effective date of the decision is the date of the notification letter. 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 that 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.
- 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 Time Lines

The following summarizes the time lines 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 withdraw the complaint.
- Within 15 days of the complainant confirming their wish to proceed with investigation or after the 30-day period for withdrawing the complaint has elapsed, the complaint is sent to the program for a response, which must be submitted within 45 days. The program must indicate 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 CAA 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.

B. Complaints Against the Council on Academic Accreditation

Complaints against the Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA) may be filed by any individual(s).

Criteria for Complaints

Complaints against the CAA must meet the following criteria:

- relate to the content or the application of the <u>Standards for Accreditation of Entry-Level Graduate Education Programs in Audiology and Speech-Language Pathology</u> [PDF], or the policies, procedures, and operations that were in use by the CAA at the time the conduct being complained about occurred;
- be clearly described, including the specific nature of the charge and the documentation to support the charge;
- must be filed within 1 year of the date the conduct being complained about occurred

Complaints also must meet the following submission requirements:

- include the complainant's name, address, and telephone contact information in order for the Accreditation Office staff to verify the source of the information;
- must be complete at the time of submission, including the complaint and all appendices;
- 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.
- submit all complaints and supporting evidence in English, consistent with the business practices of the CAA;
- be signed and submitted in writing via U.S. mail, overnight courier, or hand delivery complaints will not be accepted via e-mail or as a facsimile— to the following address:

Vice Presidents for Academic Affairs 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.

Procedures:

Determination of Jurisdiction

Within 15 calendar days of receipt of the complaint, Accreditation Office staff will acknowledge receipt of the complaint and will forward a copy of the complaint to the Vice Presidents. The original letter of complaint will be filed in the Accreditation Office. If either of the Vice Presidents for Academic Affairs have a conflict of interest with the complainant, only one Vice President will implement the procedures in accordance what CAA's conflict of interest policy.

The Vice Presidents will determine whether the complaint meets the above criteria. If the Vice Presidents make the determination that the complaint does not meet the above-listed criteria, the complainant will be informed within 30 calendar days of transmitting the complaint to the Vice Presidents that the complaint will not be investigated.

Investigation of Complaint

If the Vice Presidents determine that the complaint meets the above-listed criteria, the complaint will be investigated as specified below. The investigation will be based on the policies and procedures in effect at the time of that the alleged conduct occurred, which serves as the basis for the complaint.

a. The Vice Presidents inform the complainant within 30 calendar days of the letter transmitting the complaint to the Vice Presidents that the investigation will proceed. Because it may be necessary to identify the complainant to the CAA, the Review Committee, or to other sources of relevant information, the complainant will be required to sign a waiver of confidentiality within 30 calendar days of the letter indicating that the complaint will be investigated. The complainant will be given the opportunity to withdraw the complaint during that time. If the complainant does not wish to pursue the matter or does not file the waiver within 30 calendar days, the process is concluded. If the complainant wishes to proceed, the complainant is asked to keep the initiation of an investigation confidential, pending the investigation and processing of the complaint.

Within 15 calendar days of receipt of the waiver, or after the 30-day period for withdrawing the complaint has elapsed if the waiver was received with the complaint, the Vice Presidents will notify the CAA that a complaint has been registered against the council and that an investigation is in process. The notification will include a copy of the complaint from which the name of the complainant has been redacted. The CAA may request an unredacted copy within 15 calendar days of receipt if needed for its response. The CAA will be asked to provide complete responsive information and supporting documentation that it considers relevant to the complaint within 45 calendar days of the date of the notification letter.

The CAA may request an extension to file its response if extenuating circumstances exist, but the time line will not be extended beyond 45 additional days from the original due date. The extension request must be submitted no later than the original due date and include the rationale for additional time requested, which will be considered by the Vice Presidents in making its decision whether to grant an extension.

b. The Vice Presidents shall appoint a Review Committee to review the complaint against the council within 30 calendar days of receipt of the complainant's waiver of confidentiality, or after 30 calendar days to withdraw the complaint has elapsed.

The Review Committee shall consist of three members. To ensure that the committee is thoroughly familiar with accreditation standards and council policies and procedures, the Committee shall consist of two past members of the CAA who have served during the preceding 5 years, none of whom shall have any relationship to or conflict of interest with, the complainant. The third committee member shall be a public member who has served in that capacity on an ASHA board or committee, e.g. CAA, Council for Clinical Certification, Board of Ethics, within the past 5 years. Accreditation staff shall maintain a list of individuals who are qualified by prior service on the CAA to serve on ad hoc review committees. The list shall be updated on an annual basis and made available to the ASHA Vice Presidents for Academic Affairs as needed. All past CAA members of ad hoc review committees shall be selected from that list. Accreditation staff will identify public members from other ASHA boards and committees, to provide to the Vice Presidents if needed in assembling a review committee.

The Vice Presidents will contact each selected person to determine his/her willingness to serve

on the Review Committee and shall designate one of them as chair. The Vice Presidents will provide to the Review Committee members materials to support the review of the complaint (i.e., CAA's Accreditation Handbook, including the conflict of interest policy, review process guidelines and materials, recommendation options, etc. Review Committee members are expected to sign a confidentiality agreement.

- c. Within 15 calendar days of receipt of the CAA's response to the complaint, the Vice Presidents will forward the complaint and the CAA response to the complaint to the Review Committee.
- d. The function of the Review Committee is to determine whether the CAA followed its policies, procedures, and operations as indicated in the *Accreditation Handbook*, including the content and consistent application of its Standards, relevant to the complaint based on its review of the complaint materials and CAA's response to the complaint. Within 60 calendar days from the date material related to the complaint is mailed to the Review Committee and after reviewing all relevant information, the Review Committee shall report to the Vice Presidents its recommendations. Such recommendations may include, but are not limited to:
 - dismissal of the complaint,
 - recommended changes in council policies and procedures to be implemented within a specified time period;
 - other recommended steps.
- e. Within 15 calendar days receipt of the Review Committee's report, the ASHA Vice Presidents will disseminate the Review Committee's recommendations/report to the CAA and to the complainant.
- f. A full discussion of the recommendations of the Review Committee shall be placed on the agenda for the next regularly scheduled meeting of the CAA for consideration of appropriate council action. In the event that more immediate action is required, the CAA may have a conference call for discussion and consideration of appropriate council action. The CAA shall make a final determination that is consistent with the Review Committee's recommendations and that is in accordance with the requirements for the CAA's external recognition. The CAA will inform the Vice Presidents of its decision/action plan within 15 calendar days of its final decision.
- g. The Vice Presidents will notify the complainant of council action on the complaint within 15 calendar days of the council's decision in the matter. Decisions of the council relative to complaints may not be appealed.

Summary of Time Lines

- The complaint is acknowledged and forwarded to the Vice Presidents within 15 calendar days of receipt.
- If the Vice Presidents determine that the complaint does not meet the criteria for complaints, the complainant is informed within 30 calendar days that the complaint will not be investigated.
- If the Vice Presidents determine that the complaint meets the criteria, the complainant is informed within 30 calendar days that the investigation will proceed.
- The complainant is given 30 calendar days to sign a waiver of confidentiality or withdraw the complaint.
- Within 15 calendar days of receipt of the waiver of confidentiality or after the 30-day period to withdraw the complaint has elapsed if the waiver is received with the complaint, the complaint is sent to the CAA for a response within 45 calendar days.
- Within 30 calendar days of receipt of the waiver of confidentiality, the Vice Presidents appoint a Review Committee to review the complaint.

- Within 15 calendar days of receipt of the complaint, the CAA may request an unredacted copy of the complaint if needed for its response.
- Within 15 calendar days of receipt of the CAA's response, the Vice Presidents forward the complaint and the CAA response to the Review Committee.
- Within 60 calendar days, the Review Committee determines the recommended course of action and forwards its recommendations to the Vice Presidents.
- Within 15 calendar days of receipt of the report, the Vice Presidents disseminate the Review Committee's recommendations to the CAA and to the complainant.
- The CAA discusses the Review Committee recommendations at its next regularly scheduled meeting (or by conference call if immediate action is required) and takes appropriate action.
 The CAA informs the Vice Presidents of the action within 15 calendar days of its final decision.
- The Vice Presidents notify the complainant of the CAA action within 15 calendar days of the CAA's decision.

C. Investigation of Adverse Information

The CAA reserves the right to review information received outside of the complaint and public comment processes and to initiate an investigation related to a program's compliance with the Standards for Accreditation and CAA's policies and procedures. The CAA may only consider information that relates to a program accredited by or in candidacy with the CAA. Information may be considered adverse if it indicates possible non-compliance with CAA Standards for Accreditation and CAA's policies and procedures.

The CAA may identify compliance concerns about an accredited or candidate program between periods of scheduled reviews as a result of information received directly from, as an example, one or more of the entities listed below. The CAA would determine the credibility of the information following the initial review for jurisdiction by the CAA.

- institutional and/or specialized accrediting agencies
- state regulatory bodies
- licensure and professional certification boards
- U.S. Department of Education
- public media sources
- other sources

Procedures:

Determination of Jurisdiction

Within 15 days of receipt of the adverse information, Accreditation Office staff will acknowledge receipt of the information if sent directly to the CAA, with the exception of public media sources, and will provide this information to the Executive Committee of the CAA. Accreditation staff will verify that the information relates to an accredited or candidate program.

The Executive Committee of the CAA will consider whether 1) the information is credible and actionable, and 2) relates to the program's compliance with the Standards for Accreditation or required policies and procedures. The Executive Committee then will vote to determine if the information warrants further investigation. 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.

If the Executive Committee of the CAA makes the determination that the adverse information does not address any standards, policies or procedures that are under the CAA's purview, the CAA will not investigate. The CAA will not advise the program about the source or jurisdiction activities if no investigation is warranted.

The Accreditation Office will advise the source, if the information was submitted directly, of its decision whether to proceed with an investigation. The Executive Committee also may provide clarification on the role and function of the CAA if appropriate in the communications to the source.

Investigation of Adverse Information

If the Executive Committee of the CAA determines that an investigation should proceed, the CAA will base its review on the Standards for Accreditation, policies, and procedures in effect as of the date that the adverse information is received by CAA.

- a. Within 15 days of the Executive Committee's decision to investigate, 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 adverse information has been received against the program. The notification will include a copy of the adverse information and the source, and advisement from the Executive Committee as to the standards, policies, or procedures that must be addressed by the program.
- b. The CAA will require the program to respond within 10 days of the letter forwarding the adverse information as to whether or not it intends to provide complete responsive information and supporting documentation considered relevant to address the adverse information. The CAA may draw reasonable inferences from a program's failure to provide a response to the adverse information. The program must respond to all of the specific elements identified in the adverse information and describe how the program addressed the concerns as they related to CAA's standards, policies or procedures. The formal 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.
- c. 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.
- d. Within 15 days of receipt of the program's response to the adverse information, the Chair of the CAA will forward the adverse information, the Executive Committee's letter outlining what the program was to address, and the program's response to the CAA.
- e. After reviewing the adverse information, the program's response to the adverse information and other information requested by the CAA Chair, the CAA will determine its course of action within 30 days. Such actions include, but are not limited to, one or more of the following:
 - dismiss the investigation,
 - 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, if applicable
 - withhold/withdraw accreditation.
- f. If the CAA determines that a focused 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, policies, or procedures 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.

- g. The CAA will review the adverse information, the program's response to the adverse information, and other information requested by the CAA Chair, including the site visit report and the program's response to the report, and will take one or more of the following actions within 21 days of receipt of the program's response:
 - dismiss the investigation,
 - 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, if applicable
 - withhold/withdraw accreditation.

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. See Chapter XVIII Further Consideration and Appeals Procedures.