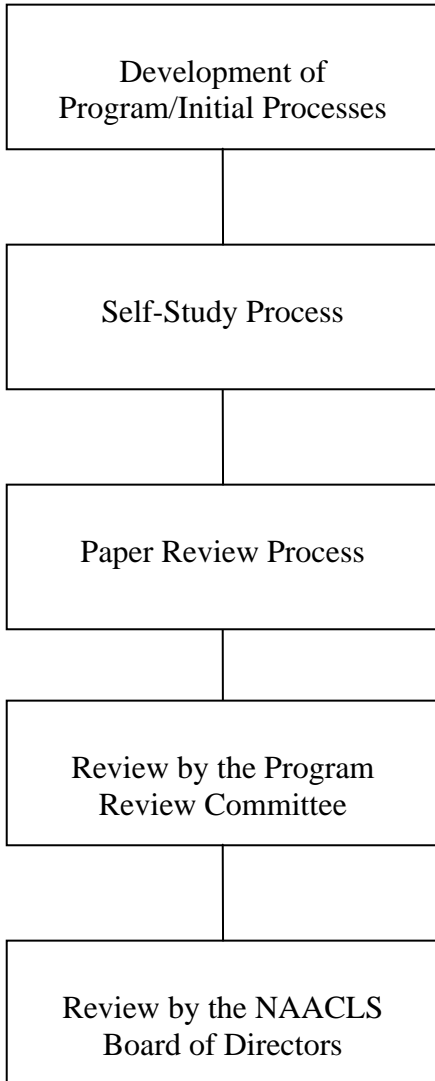


# **SECTION II**

## **Procedures for Review: Initial and Continuing Approval**

10/2011

# The Overall Approval Process



## **Development of Program/Initial Processes**

Programs seeking Initial Approval must first comply with several requirements including a letter of intent, a completed initial application, payment of an initial application fee, and approval of a preliminary report.

## **The Self-Study Process**

The first step in the evaluation of a program is the program's own self-evaluation. This is accomplished by the Program Director with the cooperation of the program faculty and administration. NAACLS has made the forms that the reviewers will use available for download on the NAACLS web site ([www.naacls.org](http://www.naacls.org)) as an aide for program officials to evaluate their program. While the program's self-evaluation certainly should review the NAACLS Standards, other documents, such as the programmatic and institutional mission statements, supply additional missions for the functions of the program. The result of this self-evaluation is the Self-Study, which is a document that demonstrates the program compliance with the Standards. Directions for assembling the Self-Study are found in Section III.

## **The Paper Review process**

The paper reviewer is charged with the review of the Self Study, ensuring that the Self-Study adequately demonstrates the program's compliance with the Standards. The paper reviewer is evaluating the Self-Study, rather than the program, thus assuring that good practice processes are documented. In addition, the paper reviewer is the earliest outside source to review the adequacy of compliance. The program receives the Paper Review Report and is directed to develop a Paper Review Response. The Response attempts to clarify issues identified in the Paper Review, and perhaps to develop new policies and procedures to address the concerns noted.

## **The Review by the Program Review Committee**

Based on the review of Paper Review Report, the Program's Response to the Paper Review Report, the Site Visit Report, and the Program's Response to the Site Visit Report, the

Program Review Committee makes determinations as to the compliance, marginal compliance or non-compliance of a program with the Standards and recommends approval actions to the NAACLS Board of Directors.

### **The Review by the NAACLS Board of Directors**

Based on the recommendations of the Program Review Committee, and with review of consistent application of the Standards and to insure that decisions are not arbitrary, capricious or otherwise inconsistent with the Standards, performs all approval actions of awarding, withholding and withdrawing.

# THE INITIAL APPROVAL PROCESS

STEP	ACTION	RESPONSIBLE PARTY	TIME FRAME FOR THE PROGRAM
<b>1. Initial Application Request</b>	Submit letter to NAACLS requesting application	CEO/President or other high ranking administrator of Sponsoring Institution	Starting point
<b>2. Submit Application and Initial Application Fee</b>	Sponsoring Institution submits Application for Initial Approval Form and Initial Approval Fee	Proposed Program Director	As soon as the program has obtained all signatures required for the application
<b>3. Submit Preliminary Report</b>	Sponsoring Institution submits: <ul style="list-style-type: none"> <li>• all completed fact sheets</li> <li>• the required criteria for a sponsoring institution.</li> <li>• all current and signed affiliation agreements or memoranda of understanding.</li> <li>• clinical experience of at least 100 hours.</li> <li>• competencies that are cross-referenced to the program objectives.</li> <li>• a qualified program director.</li> <li>• Allocation of time for administrative and teaching</li> <li>• summary of program, including the time required, courses and award granted.</li> <li>• assurance of financial support.</li> <li>• instructional resources.</li> <li>• description of student recruitment</li> </ul>	Proposed Program Director	As soon as the program has all documentation prepared
<b>4. Review of Preliminary Report</b>	Two committee members review the report for acceptance.	NAACLS	Within one month of receipt of preliminary report and application fee.
<b>5. Self-Study Submitted</b>	The Sponsoring Institution submits:  The Self Study	The Proposed Program Director	After receipt of a positive Preliminary Report Review, but within six months.
<b>6. Serious Applicant Status Awarded*</b>		NAACLS	After three copies of the Self Study have been received
	Program proceeds with the Continuing process.		

Institutional administrators applying for initial approval must do the following:

1. Request from NAACLS information regarding the approval process.

Review of a program is undertaken only when authorized by the sponsoring institution's chief executive officer. The chief executive officer must submit a letter to NAACLS stating the intent to apply for approval. After receipt of the letter, the institution is sent the Guide to Approval, an Application for Initial Approval and fact sheets necessary to complete the Preliminary Report. Copies of the materials may be made, as necessary.

2. Submit the Application for Initial Approval to NAACLS.
3. Pay the Initial Application Fee.
4. Submit a Preliminary Report.

Upon receipt of the Preliminary Report, NAACLS sends the program director an invoice for the Initial Application Fee. (Contact the NAACLS business office for information regarding fees.)

The Preliminary Report is a general overview of the program and not a Self-Study Report. The program director must submit **three** copies of the Preliminary Report to NAACLS. It should include:

- a. all completed fact sheets**
- b. the required criteria for a sponsoring institution.**
- c. all current, annually reviewed, and signed affiliation agreements or memoranda of understanding.**
- d. clinical experience of at least 100 hours.**
- e. competencies that are cross-referenced to the program objectives.**
- f. a qualified program director.**
- g. Allocation of time for administrative and teaching duties for administrators and faculty.**  
Describe the faculty's ability to fulfill their teaching and administrative responsibilities.
- h. summary of program, including the time required for program completion, courses offered and award granted.**
- i. assurance of financial support.**
- j. instructional resources.**
- k. description of student recruitment, processing of applications and selection of students.**

The Preliminary Report is reviewed and, if the committee is reasonably assured that the program will meet the Standards, NAACLS notifies the program director to begin the self-study process. Additional documentation and clarification may be requested before a program is encouraged to proceed. Each set of additional documentation or submission of a new preliminary report entails an additional review, and NAACLS will perform a maximum of three (3) reviews, including the first, for any single application. If the report is not satisfactory after the third review, the entirety of the process must be completed, including the submission of a new application and application fee. NAACLS assigns a Self-Study Report due date and a site visit date. *Ideally*, the Self-Study Report due date is prior to graduation of the first class of students. The site visit date is no later than three months after the class graduates and within six months of the Self-Study Report due date.

5. Submit the Self-Study Report.

Send **three** copies of the completed Self-Study Report to NAACLS.

6. Achieve "serious applicant" status.

NAACLS considers a program a "serious applicant" for approval when it has achieved the following steps:

- A. Submitted an Application for Initial Approval.
- B. Received approval for the Preliminary Report.
- C. Submitted the Initial Application Fee.
- D. Submitted three copies of the completed Self-Study Report.

Periodically, certification agencies request information from NAACLS regarding whether or not a program is considered to be a "serious applicant." Until NAACLS has received these items, it does not report that a program is a "serious applicant." **NAACLS has no authority to determine admission to a certification examination. All questions regarding eligibility for such examinations should be directed to the following certification agencies:**

ASCP Board of Registry, (312) 738-1336

National Credentialing Agency for Laboratory Personnel, (913) 438-5110

7. Continue with the Continuing review Process, starting with the submission of three copies of the Self-Study.

# Continuing Approval Process

STEP	ACTION	RESPONSIBLE PARTY	TIME FRAME FOR THE PROGRAM
<b>1. Self Study submitted to NAACLS</b>	Submit Self Study to NAACLS	Program Director	Due by date set by NAACLS
<b>2. Self Study Paper Review</b>	Self-Study is evaluated, Reviewer submits a written report (Paper Review)	NAACLS	Within 2 months of receipt of Self Study
<b>3. Response to Paper Review</b>	Response to Paper Review is submitted with supporting documentation	Program Director	Within 1 month of receipt of Paper Review

All documentation is reviewed by NAACLS.

Programs Review Committee Recommendations for approval are submitted to NAACLS Board of Directors.

NAACLS Board of Directors awards approval.

The continuing approval process begins approximately 18 months before the end of the program's current approval period. NAACLS notifies the program director approximately one year before the Self-Study Report is due and sends appropriate materials. The Application for Continuing Approval must be returned to NAACLS. A Self-Study Report is also required.

## Turning in the Self-Study Report

Three copies of the Self-Study Report should be mailed to the NAACLS office to arrive by the due date listed in the Notification of Renewal letter. The NAACLS address is:

NAACLS  
5600 North River Road, Suite 720  
Rosemont, IL 60018

Additional copies should be held by the program for the program director and administration.

In the event that the Self-Study will not be complete in time to arrive at the NAACLS office by the listed due date, please contact the NAACLS office as soon as possible.

## Self-Study Report Paper Review

A Self-Study Report Paper Review is an annotated abstract of the information provided in the Self-Study Report. After the program director submits three copies of the Self-Study Report to NAACLS, staff sends two copies to qualified paper reviewers who determine: (1) if the program has submitted all required information, and (2) if narrative and documentary materials clearly describe the program. **Determining compliance with the Standards is not a function of the Self-Study Report**

**paper reviewer.** The paper reviewer identifies missing information and/or documents, areas of concern, and any additional areas that should be addressed.

NAACLS receives the Paper Review and sends it to the program director. The program director is encouraged to share this review with the administration and faculty. The program director **must** submit to NAACLS a response to the Paper Review. Should the materials within the Self-Study Report be cited as lacking or in need of clarification, these materials should **also** be re-submitted with the response.

## **Review by the Program Review Committee**

The Program Review Committees meet twice per year to discuss Recommendations for Approval. For each program, the committee will review the Paper Review, the Paper Review Response, and any supplementary materials that have been received by the NAACLS office with enough time to distribute to the Committee. **The Program Review Committee does \*not\* review the original Self-Study document, so, if a response references the Self-Study, that portion of the Self-Study must be re-submitted within the response.**

The Program Review Committee first reviews the program to determine compliance with the Standards. Based on the compliance with the Standards, the Committee then recommends an approval action. All recommendations are then sent to the Board of Directors, who will make the final decision on all approval awards.

### **Approval Categories**

When determining approval recommendations, the review committee states that a program is in compliance, non-compliance or marginal compliance with the Standards. These definitions are provided to clarify the approval categories:

#### *Compliance*

This indicates that a program meets the requirements of the Standards.

#### *Marginal Compliance*

This indicates that a program partially meets the requirements of the cited Standard(s) or that compliance with the cited Standard(s) is planned or in progress but plans have not been completed. A citation of marginal compliance is accompanied by a rationale and recommendation for compliance with the cited Standard(s) in the approval recommendation letter to the program and in the board award.

#### *Non-Compliance*

This indicates that a program fails to meet the cited Standard(s). A citation of non-compliance is accompanied by a rationale and recommendation for compliance with the cited Standard(s) in the approval recommendation letter to the program and in the board award.

NAACLS notifies the sponsoring institution's chief executive officer and program director of its approval recommendation and board award.

The number of citations of marginal compliance and non-compliance determine the award recommended.

Following are approval categories.

**Approval for Four Years:** Four years may be recommended for a program with:

1. No full citations of noncompliance.
2. One or more marginal citations.

A Progress Report documenting the program's compliance with the cited Standard(s) is required.

**Approval for Less Than Four Years:** One year may be recommended for a program with:

One to four full citations of noncompliance and any number of citations of marginal compliance.

A Progress Report documenting the program's compliance with the cited Standard(s) is required. Approval may be extended to four years if the Progress Report demonstrates compliance with the cited Standard(s).

Failure to submit a satisfactory Progress Report within the specified time period results in an award of Administrative Probationary Approval.

**Probationary Approval:** This may be recommended for a program with:

1. Five or more full citations of noncompliance and may extend for a period of six months to one year.

The number of citations indicates a program has deficiencies that may jeopardize an acceptable educational experience for students. A Progress Report documenting the program's compliance with the cited Standard(s) is required. Approval may be extended to four years if the Progress Report demonstrates compliance with the cited Standard(s).

2. A Progress Report is found to be unsatisfactory.

If Probationary Approval is recommended for the program, the program director is sent an outline of NAACLS' Due Process Procedure. The chief executive officer of the institution should then notify students enrolled in the program and those seeking admission that the program's approval is probationary. If the program director wants NAACLS to reconsider the recommendation for Probationary Approval, the program director must request this in writing within 30 days.

A program's failure to comply with the Standard(s) within the Probationary Approval period results in a recommendation of Withdrawing Approval.

**Administrative Probationary Approval: Six months to one year** may be recommended for a program that does not comply with the following administrative requirements for maintaining approval:

1. Submission of a Self-Study Report by the established due date.
2. Submission of a Progress Report by the established due date.
3. Payment of all approval fees.

4. Notification of changes in program director and/or clinical affiliates within 30 days to the NAACLS office.
5. Completing an Annual Report provided by NAACLS, returning it by the established deadline.

Before a program is placed on Administrative Probationary Approval, NAACLS informs the program director by certified mail of the relevant requirements, policies and procedures that will be followed. Administrative Probationary Approval is not subject to appeal. During a period of Administrative Probationary Approval, programs are recognized as being approved.

If NAACLS awards Administrative Probationary Approval to the program, its notification letter states that the program is in noncompliance with the requirements for maintaining approval and lists the requirements in question. A program's failure to comply with the requirements for maintaining approval within the six-month to one-year period results in Withdrawing Approval status.

The chief executive officer of the institution should notify the students enrolled in the program and those seeking admission that the program's approval is probationary.

**Withholding Approval:** This award applies only to programs applying for initial approval. This may be recommended for a program when a program does not meet the Standard(s) and deficiencies noted may not be easily correctable.

If NAACLS recommends Withholding Approval for a program, it identifies all aspects of the program that are not in compliance with Standard(s) and sends guidance to the program regarding all possible means of meeting the requirements. The institution may withdraw the application for approval before the NAACLS Board of Directors acts upon this recommendation. NAACLS offers the program director the option to follow NAACLS' Due Process Procedure.

If NAACLS recommends Withholding Approval status, it notifies the chief executive officer and program officials of its Due Process Procedure. If the officials choose to exercise the options under the Due Process Procedure, they must do so in writing. If not, they may reapply for approval one year after NAACLS' action. During that time, the program director and chief executive officer should correct deficiencies in the program and document compliance with the Standard(s).

**Withdrawing Approval:** This may be recommended for a program when:

1. The program fails to comply with the Standard(s) within the specified period of Probationary Approval or Administrative Probationary Approval.
2. All other possibilities have been exhausted.
3. No other alternative is feasible.

NAACLS offers the program the option to follow NAACLS' Due Process Procedure. The program may reapply one year after the effective date of the board action.

***When approval is withdrawn from a program, students enrolled in the program at the time of this action are permitted to complete the program and are considered graduates of a NAACLS approved program.***

**NAACLS must award a program Probationary Approval or Administrative Probationary Approval before it can withdraw Approval from the program.**

**Voluntary Withdrawal of Approval:** NAACLS recognizes and accepts this action at the sponsoring institution's request. The program's name is removed from the list of approved programs.

*Reapplication for Approval*

If a program withdraws or is denied approval, it may not reapply until a period of one year has elapsed.

**Administrative Probationary Approval**

This may be awarded to a program that does not comply with the following administrative requirements for maintaining approval:

1. Submission of a Self-Study Report, an Application for Continuing Approval, or a required Progress Report by the established due date.
2. Payment of all approval fees.
3. Notification to NAACLS of relevant administrative and operational changes within 30 days. This includes changes in program official names, addresses or telephone numbers; affiliates, status (i.e., inactivity, closure) or location; and institution name.
4. Completing an Annual Report prescribed by NAACLS and returning it by the established deadline.
5. In accordance with federal and state requirements, verifying compliance with these Standards upon request from NAACLS.

Before a program is placed on Administrative Probationary Approval, NAACLS informs the program director by certified mail of the relevant requirements, policies and procedures that will be followed.

**Administrative Probationary Approval is not subject to appeal.** During a period of Administrative Probationary Approval, programs are recognized as being accredited.

If NAACLS awards Administrative Probationary Approval to the program, its notification letter states that the program is in non-compliance with requirements for maintaining approval and lists the requirements in question. A program's failure to comply with requirements for maintaining approval results in Withdrawing Approval status.

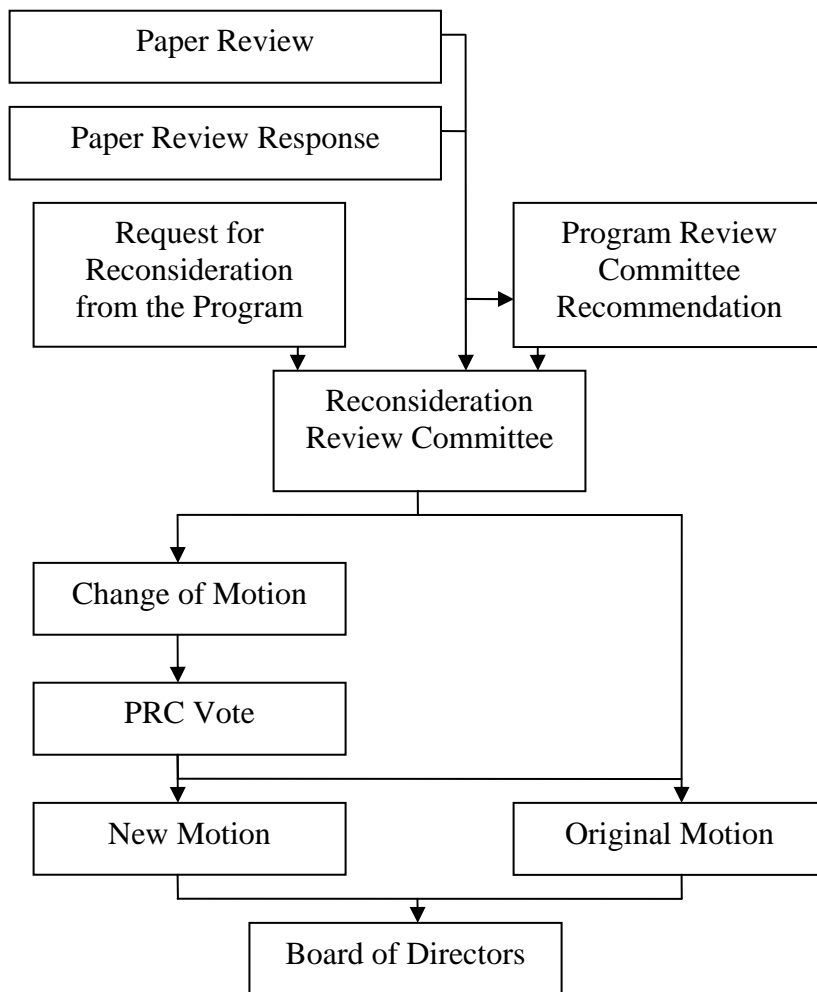
The chief executive officer of the institution should notify students enrolled in the program and those seeking admission that the program's approval is probationary. A program that has been placed on Administrative Probationary Approval cannot receive seven years of approval at the next review.

**Review by the Board of Directors**

The Board of Directors receives the recommendations of from the Program Review Committees and reviews them for consistency in the application of Standards, the consistency of the years awarded and the consistency of process. The Board then acts on approval and approval actions, including granting, continuing and withdrawing approval and approval.

# NAACLS' Due Process Procedure

## Reconsideration Process



### Purpose and Criteria

The Due Process Procedure provides an opportunity to reexamine a NAACLS action of approval. There are two levels of due process: first to the review committee (Reconsideration), second to the Board of Directors (Appeal). The process may not be used to postpone implementing the approval action. The program's request to the review committee to reconsider the approval recommendation must include a concise statement citing the cause for reconsideration and the basis for the request with relation to the materials available during the respective review cycle.

### Reconsideration Process

Programs are given an opportunity to request Reconsideration after they have received notification of the review committee's recommendation. In order to take advantage of this due process option, within **30 days** from receipt of the review committee's notification, the program must provide in writing to NAACLS a request for Reconsideration of the committee's recommendation. The request must be based on

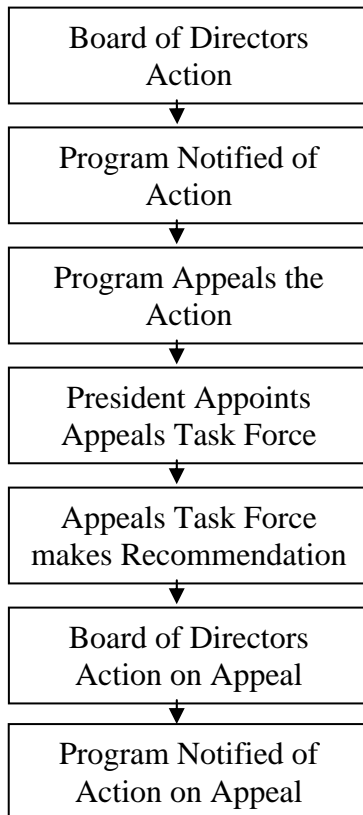
the non-application or mis-application of Standards and/or inconsistency with established procedures.

The program must have completed all previous steps in the approval process. These include responding to the Paper Review and Site Visit Report by either concurring with the findings or addressing each negative finding or concern. All missing or additional documentation must be submitted in these responses. **No new materials will be evaluated in the reconsideration process.**

The reconsideration request will be reviewed by a subcommittee of the Program Review Committee which will either uphold the original recommendation or present another motion to the entire committee for a vote. Depending upon the outcome of the vote, a new recommendation may be forwarded to the Board of Directors.

A program may petition the Board of Directors for appeal only if the review committee's recommendation appears arbitrary, capricious or inconsistent with the Standards and NAACLS' procedures.

## Appeal Process



### Appeals Process

Programs have the opportunity to appeal decisions of the Board of Directors related to their approval status. Within **30 days** from receipt of the board letter stating the action, the program must notify the executive director of an intent to appeal.

The letter of intent must indicate a specific misapplication of Standards (or non-application) or an inconsistency with established procedures. The program should have completed all previous steps in the approval process including responding to the Paper Review and Site Visit Report by either concurring with findings or addressing any negative findings or concerns in the reports.

The president of the Board of Directors establishes an ad hoc task force of at least three individuals to review the appeal. The task force is appointed by the president from a pool of persons having previously served on the Board of Directors or review committees but who played no role in the decision which is under appeal.

The Appeals Task Force conducts a thorough review of all existing documentation and recommends an approval award to the Board of Directors. The board makes the final decision related to the appeal.

A program may appeal a specific approval action only once.

