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May 22, 2020

Dr. Darren Moore
Marriage and Family Therapy Program
Touro University Worldwide Online Program (MA)

Dear Dr. Moore:

The Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE), at its April 24-25, 2020 meeting, reviewed the Marriage and Family Therapy (MA) program at Touro University Worldwide Online Program for Initial Accreditation. This review included consideration of the program's Eligibility Criteria, Self-Study, COAMFTE's Self-Study Review Letter, Program's Additional Information, Site Visit Report, Program's Response to Site Visit Report, and any additional materials submitted by the program.

The Commission voted to grant Initial Accreditation for a period of six (6) years, May 1, 2020 - May 1, 2026, with **Stipulations** on the following Key Elements:

<div align="center">

Key Element V-A
Key Element V-B
Key Element V-D

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The Commission's review of the program's Initial Accreditation materials is below:

ELIGIBILITY CRITERIA

Commission's Response:
The program provided sufficient information to meet all the Eligibility Criteria.

STANDARD I: OUTCOME-BASED EDUCATION

Key Element I-A: Outcome-Based Education Framework
The program has an overall outcome-based education framework that includes the following:
- *A description of the program's mission, and how it fits with the larger institutional setting of the program.*

- *Specific program goals (which describe broad aspirations for the program and for students/graduates of the program) are clearly derived from the program's mission and that promote the development of Marriage and Family Therapists (including knowledge, practice, diversity, research, and ethics competencies).*
- *Measurable Student Learning Outcomes (SLOs) for each program goal.*
- *Programs must include SLOs that measure student/graduate achievement appropriate to the program's mission and goals.*
- *Specific assessment measures for operationalizing the achievement of Student Learning Outcomes (including student/graduate achievement) including targets and benchmarks. Measurement includes assessment of students' academic and professional competencies by the faculty and others, appropriate to the program's mission, goals, and outcomes.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of alignment of its mission and goals with the institutional mission and student learning outcomes. The program implemented its mission through five goals, each aligned with a unique student learning outcome that demonstrated and measured student achievement through multiple measures complete with benchmarks and targets. The Site Visit Team verified the evidence on-site.

Key Element I-B: Assessment Plan with Mechanisms and Timeline
The program has an overall assessment plan that includes:
- *Mechanisms in place for evaluating/reviewing the Student Learning Outcomes, including student/graduate achievements (utilizing specific measures identified in I-A).*
- *Mechanisms in place for evaluating student support services; curriculum and teaching/learning practices; fiscal and physical resources; technological resources; and instructional and clinical resources to determine sufficiency for attainment of targeted program outcomes.*
- *An assessment plan and corresponding timeline that addresses when, from whom, and how data is collected, and a description of how data will be aggregated and analyzed and the findings used for program improvement (feedback loop). The assessment plan should include a specific description of how the program will review and revise, as needed, their overall outcome-based education framework and assessment plan.*
- *The assessment plan must incorporate feedback from Communities of Interest (as defined in Key Element I-C).*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of its assessment plan including mechanisms, measures, processes, policies, examples, and review. The program identified its Communities of Interest and the primary survey mechanisms through which input is gathered for use in program review. The Site Visit Team verified the evidence on-site.

Key Element I-C: Communities of Interest
The program identifies its Communities of Interest, obtains formal and informal feedback from them, and describes how they inform the program's mission, goals, and Student Learning Outcomes. Communities of Interest vary according to the program's mission, goals, and outcomes and may include, but are not limited to, students, administrators, faculty, supervisors, consumers, graduates, potential employers, germane regulatory bodies, germane private and public funding sources, and diverse, marginalized, and/or underserved groups within these communities.

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of mechanisms for receiving informal and formal feedback from its Communities of Interest and examples of how this feedback was used for program improvement, and representation of diverse, marginalized, and/or underserved groups. The Site Visit Team verified the evidence on-site.

STANDARD II: COMMITMENT TO DIVERSITY AND INCLUSION

Key Element II-A: Multiculturally-Informed Education Approach
The program has a multiculturally-informed educational approach that includes:
1) *specific program goals with specific Student Learning Outcomes reflecting a commitment to diversity and inclusion;*
2) *an overarching definition of diversity; and*
3) *curriculum elements with accompanying teaching/learning practices consistent with the program's mission. The educational approach includes the teaching of ideas and professional practices for MFTs that address a range of diversity, including (but not limited to) race, age, gender, ethnicity, sexual orientation, gender identity, socioeconomic status, disability, health status, religious, spiritual, and/or political beliefs, nation of origin or other relevant social categories, immigration or language.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of a multiculturally-informed educational approach aligned with the institution's mission and program mission, goals, and student learning outcomes, including an outcome specific to diversity and inclusion. The program demonstrated how it infuses its curriculum with attention to diversity related training and information. The program presented its definition of diversity. The Site Visit Team verified the evidence on-site.

Key Element II-B: Program Climate of Safety, Respect, and Appreciation
- *The program has demonstrated systematic efforts and has an ongoing comprehensive strategy in place to attract and retain a diverse student body, faculty, and supervisors.*
- *The program demonstrates a climate of safety, respect, and appreciation for all learners including those from diverse, marginalized, and/or underserved communities, and has mechanisms in place for evaluating the climate and responding to any feedback regarding the climate.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of strategies for recruiting diverse students, faculty and supervisors. The program identified and provided evidence of multiple policies related to ensuring a climate of safety and respect both at the institutional and program level and provided evidence of qualitative and quantitative mechanisms for evaluating the climate. The Site Visit Team verified the evidence on-site.

Key Element II-C: Experience with Diverse, Marginalized, and/or Underserved Communities
The program demonstrates student experience in Couple or Marriage and Family Therapy practice with diverse, marginalized, and/or underserved communities. Experiences may include:
1) *professional activities (such as therapy, research, supervision, consultation, teaching, etc.) with diverse, marginalized, and/or underserved communities; and/or*
2) *other types of activities (such as projects, service, interviews, workshops, etc.), as long as the program can demonstrate that the experience is directly related to MFT activities, and students are in interaction with members of these communities.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of specific mechanisms for accomplishing required clinical experience working with diverse, marginalized, and/or underserved communities within the MFT Handbook, the advising process and practicum site selection. The program reported that practicum student experience is monitored by ongoing evaluations by both the student and supervisor that include student experience with client diversity. Examples of five student sites were provided, plus data from two evaluations, the Evaluation of Clinical Site and Supervisor and the Learning Agreement Evaluation. The Site Visit Team verified the evidence on-site.

STANDARD III: INFRASTRUCTURE AND ENVIRONMENTAL SUPPORTS

Key Element III-A: Fiscal and Physical Resources
The program demonstrates that fiscal and physical resources are sufficient to achieve the program's mission, goals, and outcomes. These resources are reviewed, revised as needed, and support program effectiveness.

Commission's Response:
The program meets the requirements of this Key Element. The program addressed physical space needed to support the program's online delivery model and reported that the institution budgets fiscal resources for instruction, academic and institutional support, and student services proportionately to student enrollment, and presented the MFT Program Budget for review. The program described a definition of sufficiency of fiscal and physical resources, how it measures sufficiency based on this definition, and evidence that demonstrates sufficiency. The Site Visit Team verified the evidence on-site.

Key Element III–B: Technological Resources

The program demonstrates that technological resources (e.g., laptops, audio/visual equipment, EMRs and Billing Systems, Virtual Meeting Space) are secure, confidential, Health Insurance Portability and Accountability Act compliant (if relevant), and sufficient to achieve the program's mission, goals, and outcomes. These resources are reviewed, revised as needed, and support program effectiveness.

Commission's Response:

The program meets the requirements of this Key Element. The program provided description and documentation of technological resources that support the program's goals and online delivery model. The program also provided definitions for sufficiency, informal and formal measures used regularly with Communities of Interests, the resulting data that met sufficiency benchmark, a review process that included feedback from students, faculty and administration, and examples of this process' use. The Site Visit Team verified the evidence on-site.

Key Element III-C: Instructional and Clinical Resources

The program demonstrates that instructional and clinical resources (e.g., space, personnel, supplies) are sufficient to enable the program to meet the program's mission, goals, and outcomes. These resources are reviewed, revised as needed, and support program effectiveness.

Commission's Response:

The program meets the requirements of this Key Element. The program provided description and documentation of instructional and clinical resources that support the program's goals and online delivery model. In addition, the program provided definitions of sufficiency, informal and formal mechanisms that gather evaluative data for continuous sufficiency review including specific questions in the MFT Program Survey completed by all Communities of Interest, with data that met sufficiency benchmark. The program described an ongoing review process within faculty meetings. The Site Visit Team verified the evidence on-site.

Key Element III-D: Academic Resources and Student Support Services

The program demonstrates that academic resources (e.g., library, advising, writing centers) and student support services (e.g., access to counseling, financial advising) are accessible to students and sufficient to achieve the program's mission, goals, and outcomes. These resources are reviewed based on core faculty and student input, and the program takes action *or advocates for institutional change to address areas required for program effectiveness.*

Commission's Response:

The program meets the requirements of this Key Element. The program provided description and documentation of academic support and student services that support the program's goals and online delivery model. Also, the program provided definitions of sufficiency for each of the two resource areas, mechanisms that gather evaluative data for continuous sufficiency review, and data that met benchmarks from specific questions in the MFT Program Survey completed by all Communities of Interest. The program described an ongoing faculty review process and included program improvement actions such as a successful request to the Provost for resources to enhance student writing skills.

Key Element III-E: Faculty Qualifications & Responsibilities

The faculty roles, in teaching, scholarship, service, and practice are identified clearly and are congruent with the program's mission, goals, and outcomes.

- *The faculty members are academically, professionally, and experientially qualified to achieve the program's mission, goals, and outcomes. The qualifications must be identified in documented descriptions of roles and responsibilities. Faculty members must have documented expertise in their area(s) of teaching responsibility and knowledge of the content delivery method (e.g., distance learning).*

- *The program must demonstrate that it has mechanisms for reviewing and evaluating faculty effectiveness in support of the program's mission, goals, and outcomes. Faculty evaluations include explicit links to the program's mission, goals, and outcomes.*

Commission's Response:

The program meets the requirements of this Key Element. The program provided evidence of descriptions of faculty roles that included teaching, scholarship, service and practice aligned with the program's mission, goals, and student learning outcomes. Also, the program presented qualifications for 21 faculty members and described faculty evaluation processes that included multiple evaluation mechanisms used to promote faculty performance either in response to identified purposes or a minimum of once every three years. The Site Visit Team verified the evidence on-site.

Key Element III-F: Faculty Sufficiency

The faculty must be sufficient in number with a faculty-student ratio that permits the achievement of the program's mission, goals, and outcomes and ensures that student educational needs are met. These resources are reviewed, revised as needed, and support program effectiveness.

- *The program must have sufficient core faculty members who are knowledgeable and involved in ongoing program development, delivery, and evaluation required to achieve the program's mission, goals, and outcomes.*

- *The program must have a stated process for evaluation of ongoing sufficiency of faculty resources.*

- *The program must demonstrate there are sufficient faculty and effective linking mechanisms with feedback loops, such as regular coordination, meetings, and/or communication, to connect and involve all faculty members in the achievement of expected and actual Student Learning Outcomes of the program.*

- *The program is permitted to use a combination of full-time, part-time and/or multiple adjuncts.*

Commission's Response:

The program meets the requirements of this Key Element. The program indicated that the institution sets a 20:1 student to faculty ratio as the benchmark for sufficient faculty resources. Also, the program demonstrated use of benchmarked data from End of Term and MFT Program Surveys to further monitor and take action on faculty sufficiency. The program classified faculty as either core faculty or core faculty in training and reported faculty are involved in course development and revision, faculty meetings and governance, and program assessment/evaluation. The Site Visit Team verified evidence

of faculty meeting minutes with program faculty attendance and program outcome agenda serving as the primary linking mechanism for program achievement and faculty engagement.

Key Element III-G: Governance of Program
Roles of faculty and student participation in the governance of the program are clearly defined and enable the program to meet the program's mission, goals, and outcomes.
The program must describe decision-making processes and procedures at the program and institutional levels regarding the operation of the program that support program effectiveness.

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of multiple mechanisms, aligned with program goals, for student and faculty participation in program governance. Faculty participate in Standing Academic Committees, Course Preparation and Online Course Development Policies, and regular faculty meetings. The MFT Advisory Committee has two student representatives who provide regular input into governance discussions. Also, the program reported decision-making processes to promote program operations and effectiveness that incorporated feedback from Communities of Interest although these were not supported by policies or other supporting evidence. The Site Visit Team confirmed the processes described by the program.

Key Element III-H: Supervisor Qualifications & Responsibilities
Supervisors must be AAMFT Approved Supervisors or meet the supervisor equivalency definition in the glossary. Supervisor roles, as distinguished from teaching faculty, are identified clearly and are congruent with the program's mission, goals, and outcomes.
- *Supervisors are academically, professionally, and experientially qualified to achieve the program's mission, goals, and outcomes. The qualifications must be identified in documented descriptions of roles and responsibilities.*
- *If supervisor equivalency is used, there must be full disclosure to students in order for them to make informed decisions and evaluate regulatory implications for other states/provinces/locations.*

Commission's Response:
The program meets the requirements of this Key Element. The program described using on-site supervisors, named as primary, and Touro University Worldwide Online program supervisors, named as secondary, with evidence of credentials for each supervisor. Also, the program reported that practicum students receive two or three hours of supervision weekly from each. The program presented four documents describing supervisor roles, responsibilities and necessary credentials. The program aligned supervisory responsibilities with the program mission, goals, and student learning outcomes. The Site Visit Team verified the information as reported by the program.

Key Element III-I: Supervisor Sufficiency
Supervisors must be sufficient in number with a supervisor-student ratio that permits the achievement of the program's mission, goals, and outcomes, especially Student Learning Outcomes. Supervisory resources are reviewed, revised as needed, and support program effectiveness.

- *The program must have a stated process for evaluation of ongoing sufficiency of supervisor resources.*
- *The program must demonstrate there are sufficient and effective linking mechanisms with feedback loops, such as regular coordination, meetings, and/or communication, connecting and involving all supervisors in the achievement of expected and actual achievement of Student Learning Outcomes within the program.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of use of an 8:1 student to supervisor ratio and defines sufficiency as adherence to this ratio. The program receives additional sufficiency evaluation data through End of Term course evaluations (Touro University Worldwide supervisors), Student Evaluation of Clinical Site and Site Supervisor (Site supervisors), and the MFT Program Survey (Communities of Interest). Student progress is aligned with the program's student learning outcomes through data from the Basic Skills Evaluation Device and the Learning Agreement Evaluation. The Site Visit Team verified the evidence on-site.

STANDARD IV: CURRICULUM

Key Element IV-A: Curriculum and Teaching/Learning Practices
The program must provide:
- *A description of the logical sequencing of the curriculum and practice components, including rationale for how the program's goals and accompanying Student Learning Outcomes fit within the program offered (e.g., where goals and outcomes are addressed and assessed within the curriculum).*
- *A description of key teaching/learning practices used to accomplish program goals, and Student Learning Outcomes.*
- *A description of processes and procedures to ensure and monitor student progress and completion of requirements.*
- *A description of governance processes and procedures for designing, approving, implementing, reviewing, and changing the curriculum.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of a curriculum alignment map of PMFTPs and a Curriculum Map of program goals and student learning outcomes across courses, and a program sequence in which students progress through foundational, core, advanced, and practicum courses that conclude with the Capstone course. The program described monitoring of student progress through specific responsibilities of the academic advisor, course instructors, the Assistant Program Director and the Program Director verified by program documents. Progress to practicum includes five mechanisms to assess/review readiness. Curriculum changes incorporate student and faculty input from multiple mechanisms that are discussed in Faculty Meetings. The Site Visit Team verified the evidence on-site.

Key Element IV-B: Foundational and Advanced Curricula

Foundational Curriculum

The foundational curriculum covers the knowledge and skill required to practice as a MFT by covering the Foundational Curricular Areas below.

- *Master's degree program must demonstrate that they offer course work that covers all the FCAs that make up the foundational curriculum.*

- *Doctoral degree programs must demonstrate that they offer course work and/or that students have completed course work, in all the areas contained in the foundational curriculum or that students demonstrate competence in those areas.*

- *Post-degree programs must demonstrate that they offer course work and/or that students have completed course work in all the areas contained in the foundational curriculum, or that students demonstrate competence in those areas.*

- *Programs may combine more than one of these foundational curriculum areas into a single course, as they build their curriculum in ways that are congruent with the program's mission, goals, and outcomes.*

- *Programs may emphasize some of the areas more than others and include other areas that are consistent with their program's mission, goals and outcomes. Programs may include another layer of requirements based on a specialization or emphasis (e.g., faith-based orientation, licensure laws, specialized certification, and so on) as long as there is a clear rationale and relational/systemic philosophy in the majority of the program.*

- *Minimum semester/quarter credits or equivalent clock hours are established for the first seven curricular areas. Programs may choose what combination of additional area 1 through 7 semester/quarter credits or equivalent clock hours beyond the individual area minimums will be taught consistent with their program's mission, goals, and outcomes.*

- *Programs must require students to develop and/or present an integrative/capstone experience before completion of their degree program as part of the foundational curriculum below. Programs must decide how to meet this requirement in keeping with the program's mission, goals, and outcomes. Examples include: a theory of change/therapy theory presentation/paper, a thesis, a therapy portfolio, or a capstone course.*

FCA 1: Foundations of Relational/Systemic Practice, Theories & Models (Minimum of 6 semester credits/8 quarter credits/90 clock hours)

This area facilitates students developing competencies in the foundations and critical epistemological issues of MFTs. It includes the historical development of the relational/systemic perspective and contemporary conceptual foundations of MFTs, and early and contemporary models of MFT, including evidence-based practice and the biopsychosocial perspective.

FCA 2: Clinical Treatment with Individuals, Couples and Families (Minimum of 6 Credits/8 quarter credits/90 clock hours)

This area facilitates students developing competencies in treatment approaches specifically designed for use with a wide range of diverse individuals, couples, and families, including sex therapy, same-sex

couples, working with young children, adolescents and elderly, interfaith couples, and includes a focus on evidence-based practice. Programs must include content on crisis intervention.

FCA 3: Diverse, Multicultural and/or Underserved Communities (Minimum of 3 Credits/4 quarter credits/45 clock hours)
This area facilitates students developing competencies in understanding and applying knowledge of diversity, power, privilege and oppression as these relate to race, age, gender, ethnicity, sexual orientation, gender identity, socioeconomic status, disability, health status, religious, spiritual and/or beliefs, nation of origin or other relevant social categories throughout the curriculum. It includes practice with diverse, international, multicultural, marginalized, and/or underserved communities, including developing competencies in working with sexual and gender minorities and their families as well as anti-racist practices.

FCA 4: Research & Evaluation (Minimum of 3 Credits/4 quarter credits/45 clock hours)
This area facilitates students developing competencies in MFT research and evaluation methods, and in evidence-based practice, including becoming an informed consumer of couple, marriage, and family therapy research. If the program's mission, goals, and outcomes include preparing students for doctoral degree programs, the program must include an increased emphasis on research.

FCA 5: Professional Identity, Law, Ethics & Social Responsibility (Minimum of 3 Credits/4 quarter credits/45 clock hours)
This area addresses the development of a MFT Identity and socialization, and facilitates students developing competencies in ethics in MFT practice, including understanding and applying the AAMFT Code of Ethics and understanding legal responsibilities.

FCA 6: Biopsychosocial Health & Development Across the Life Span (Minimum of 3 Credits/4 quarter credits/45 clock hours)
This area addresses individual and family development, human sexuality, and biopsychosocial health across the lifespan.

FCA 7: Systemic/Relational Assessment & Mental Health Diagnosis and Treatment (Minimum of 3 Credits/4 quarter credits/45 clock hours)
This area facilitates students developing competencies in traditional psycho-diagnostic categories, psychopharmacology, the assessment, diagnosis, and treatment of major mental health issues as well as a wide variety of common presenting problems including addiction, suicide, trauma, abuse, intra-familial violence, and therapy for individuals, couples, and families managing acute chronic medical conditions, utilizing a relational/systemic philosophy.

The following areas must be covered in the curriculum in some way, though there are no minimum credit requirements.

FCA 8: Contemporary Issues
This area facilitates students developing competencies in emerging and evolving contemporary challenges, problems, and/or recent developments at the interface of Couple or Marriage and Family Therapy knowledge and practice, and the broader local, regional, and global context. This includes

such issues as immigration, technology, same-sex marriage, violence in schools, etc. These issues are to reflect the context of the program and the program's mission, goals, and outcomes. Programs are encouraged to innovate in this Foundational Curricular Area.

FCA 9: Community Intersections & Collaboration
This area facilitates students developing competencies in practice within defined contexts (e.g., healthcare settings, schools, military settings, private practice) and/or nontraditional MFT professional practice using therapeutic competencies congruent with the program's mission, goals, and outcomes (e.g., community advocacy, psycho-educational groups). It also addresses developing competency in multidisciplinary collaboration.

Commission's Response:
The program meets the requirements of this Key Element. The program demonstrated how its required curriculum addressed all foundational curricular areas and described a Capstone course that includes student reflection, course reading and projects to support an integrative Case Assignment project, and embedded access to practice exams. The Site Visit Team verified the evidence on-site.

Key Element IV-C: Foundational and Advanced Application Components
The program must demonstrate they offer an application component with appropriate placement in the curriculum, duration, focus, and intensity consistent with their program's mission, goals, and outcomes.

Foundational Practice Component
- *Master's degree program and Post-degree programs that teach the foundational curriculum offer the foundational practice component (practicum and/or internship).*
- *Includes a minimum of 500 clinical contact hours with individuals, couples, families and other systems physically present, at least 40% of which must be relational. The 500 hours must occur over a minimum of twelve months of clinical practice. The 500 hours may include a maximum of 100 alternative hours or clinical activity (e.g., couple or family groups, live cases where reflecting teams are directly involved in working with clients, etc.) that is directly related to the program's mission, outcomes, and goals. Alternatively, the program may demonstrate that graduating students achieve a competency level equivalent to the 500 client contact hours. The program must define this competency level and document how students are evaluated and achieve the defined level. The program demonstrates a consistent set of evaluation criteria for achieving the defined level of competency across all students. In addition, programs that do not require 500 hours must document that students are informed about licensure portability issues that may result from not having 500 hours. Those programs requiring less than 500 hours may not use alternative hours to count toward total client contact hours.*
- *The program demonstrates a commitment to relational/systemic-oriented supervision. Students must receive at least 100 hours of supervision and must receive supervision from an AAMFT Approved Supervisor or Supervisor Candidate for at least one hour each week in which they are seeing clients. Additional supervision may be provided by AAMFT Approved Supervisors, Supervisor Equivalents, or State Approved Supervisors. Supervision can be individual (one*

supervisor with one or two supervisees) or group (one supervisor and eight or fewer students) and must include a minimum of 50 hours of supervision utilizing observable data. Supervision may utilize digital technology in which participants are not in the same location as long as the majority of supervision is with supervisor and supervisee physically present in the same location and appropriate mechanisms/precautions are in place to ensure the confidentiality and security of the means of technology delivery.

- *Programs have agreements with practice sites that outline the institutions', the practice sites' and the students' responsibilities, and published procedures in place for managing any difficulties with sites, supervisors, or students.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of meeting the foundation practice component requirements for length, client contact experience, and supervision hours. The program described its systemic commitment through supervisor requirements, its use of Site and Touro University Worldwide supervisors for a combination of five hours of weekly supervision and required use of video review. Also, the program described its use of technology in conducting weekly virtual supervision with Touro University Worldwide supervisors and provided evidence of an electronic tracking/reporting system and practicum site agreements. The Site Visit Team verified the evidence on-site.

Key Element IV-D: Program and Regulatory Alignment
The program demonstrates that graduates have met educational and clinical practice requirements (e.g., coursework, clinical experience, and supervision) that satisfy the regulatory requirements for entry-level practice in the state, province, or location in which the program physically resides or in which the student intends to practice. Programs must also document that students are informed (e.g., demonstrate review of appropriate regulatory sites or licensing laws) about the educational, clinical, and regulatory requirements for entry-level practice in the state, province, or location in which each student resides or intends to practice.

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence that it informs students of California MFT licensure requirements/processes in the MFT Handbook and describes attention to licensure information relevant to individual students during admission, advising, selected coursework, and practicum. The program presented resources to support this activity that included the Degree Plan, the MFT Degree Tracker, and AMFTRB web links. The Site Visit Team verified the evidence on-site.

Key Element IV-E: Curriculum/Practice Alignment with Communities of Interest
The program demonstrates that it considers the needs and expectations of identified Communities of Interest in developing and revising its curriculum and application component.

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of multiple mechanisms to gain input regarding curriculum from its four communities of interest consistent with

descriptions throughout the Self-Study. The Site Visit Team verified the mechanisms' use as described. The Commission recommends that the program give specific attention to separating recognition of curriculum/practice issues from program resource issues gathered from its Communities of Interest, and document how it responds to such curriculum/practice issues in the context of developing and revising its curriculum and application component.

STANDARD V: PROGRAM EFFECTIVENESS AND IMPROVEMENT

Key Element V-A: Demonstrated Student/Graduate Achievement
The program provides aggregated data regularly collected on student/graduate achievement.

Commission's Response:
The program does not meet the requirements of this Key Element. The program indicated collecting student/graduate achievement data as required in the COAMFTE data table for graduates who completed the non-COAMFTE curriculum from 2011 through 2018. With two graduates who only recently completed the new 2018 curriculum, the program does not have additional student/graduate achievement data from current cohorts at this time. The ongoing data collection processes are adequate. The program needs to provide evidence of student/graduate achievement based on updated data of graduates from the 2018 curriculum presented in this Self-Study, with revisions that might occur as needed. The program also needs to demonstrate that it provides contextual information for these data as needed.

Key Element V-B: Demonstrated Achievement of Program Goals
The program describes how data was analyzed and provides aggregated data that demonstrates achievement of each program goal via data from measured Student Learning Outcomes, based on targets and benchmarks provided in the program's outcome-based education framework—data from Student Learning Outcomes demonstrate that the program is meeting program goals.

Commission's Response:
The program does not meet the requirements of this Key Element. The program indicated that its current outcome-based education framework, including program goals, student learning outcomes, curriculum, and supporting evaluation systems as aligned with COAMFTE Accreditation Standards Version 12 were fully implemented in Summer 2018. The program also clarified that by the time of the COAMFTE Site Visit, only two students had completed the new curriculum. As a result, its current student learning outcome data represented *student progression* toward benchmark achievement of student learning outcomes. The program needs to provide evidence of a full set of student learning outcome data and achievement benchmarks for students having completed the current program design. The program also needs to provide evidence that these data were analyzed for achieving its program goals and completing program improvement actions as needed.

Key Element V-C: Demonstrated Achievement of Faculty Effectiveness
The program must demonstrate faculty effectiveness in achieving the program's mission, goals, and outcomes.
- *The program provides aggregated data that demonstrates the Program Director provides effective leadership for the program to achieve its program's mission, goals, and outcomes.*

- *The program provides aggregated data that demonstrates the performance and achievements of faculty that support attainment of the program's mission, goals, and outcomes.*

Commission's Response:
The program meets the requirements of this Key Element. The program provided evidence of a detailed process for evaluating effectiveness of the program director and assistant program director based on two mechanisms that provide survey feedback from communities of interest with data aggregated and reviewed by the Provost and the peer director. The program demonstrated a completed process for evaluating faculty and supervisors based on two mechanisms that provide survey feedback from communities of interest with data aggregated and reviewed by the program director. The faculty effectiveness evaluation system included seven benchmarks "that support the MFT Program's Mission" including one that references PMFTPs but none that explicitly references program goals or student learning outcomes, which may be considered as a program improvement area.

Key Element V-D: Demonstrated Program Improvement
The program demonstrates how evidence is used to maintain the achievement of Student Learning Outcomes and/or foster program improvement with plans for future improvement based on the evidence. Evidence includes but is not limited to findings regarding program goals and outcomes, student/graduate achievement, Communities of Interest, and evaluations (as described in the assessment plan) of curriculum and teaching/learning practices; fiscal and physical resources; technological resources; instructional and clinical resources; academic resources; and student support resources. Data should demonstrate that the program is meeting its goals and outcomes, especially specified targets and benchmarks and if not, what plans the program has for meeting or modifying its goals.

Commission's Response:
The program does not meet the requirements of this Key Element. The program provided multiple examples of program improvement actions made over the past 12 - 18 months affecting processes, program resources, and program personnel needed to effectively implement the COAMFTE aligned curriculum and related to data presented in previous Standards. The program needs to provide evidence of program improvement actions that are based on specific data review of evidence that includes student/graduate achievement and Student Learning Outcomes data as required by the Key Element.

NOTE: Consistent with the COAMFTE Corrective Action Policy (COAMFTE Accreditation Manual: Policies and Procedures, pp. 20-21), COAMFTE accredited programs carrying stipulations will have a maximum of two years from the date of stipulation to come into compliance with the standards. Year One will include Imposing of Stipulations; Year Two will include Probation and hosting a Focused Site Visit. Programs that fail to rectify such compliance issues will be subject to revocation of accreditation status at the beginning of Year Three.

Please note that the program is now in its Year 1 – Impose Stipulations stage. Consistent with the Corrective Action Policy, programs must submit a compliance report addressing deficiencies by the noted deadline, review accreditation materials, and consult with Accreditation Staff. Additionally, it is recommended that the program attend accreditation trainings and seek consultation from an external consultant (a list of consultants can be obtained from the Accreditation Office).

Programs may elect to submit their response to stipulations earlier, for an interim review, to clear their stipulations. The interim response can only be submitted during the first year of the Corrective Action Policy. Following the interim response, programs will continue to report on the established timeline. Programs interested in submitting an interim response should contact COAMFTE staff to confirm the submission deadline.

Program's Response to Stipulations Instructions:
1) Program's response should address all Key Elements that have Stipulations and include definition of all referenced Key Elements.
2) Program's response should not refer to previously submitted documents (Eligibility Criteria, Self-Study, appendices, etc.).

   - *Programs may provide additional information as supporting evidence of the program's response.*

3) Program's Response to Stipulations and any supporting documentation must be in one document, in a PDF format with bookmarks linked to the individual components. The bookmarks MUST follow the order of the individual components. The PDF document must not exceed 30 MB in size.
4) Program's Response to Stipulations must be submitted on or before the due date to coa@aamft.org.

The following documents must be submitted in the required format by the noted deadlines:

Document	Submission Deadline
Interim Response to Stipulations (optional)	*July 31, 2020*
Response to Stipulations	January 31, 2021
Annual Report	

In accordance with COAMFTE policy, the program will need to submit an Annual Report on January 31st of every year of your accreditation term.

Please feel free to contact the Accreditation Office by e-mail at coa@aamft.org or by phone at (703) 253-0448 if you have further questions or if you would like any additional information.

Sincerely,

Bobbi Miller, PhD
COAMFTE Chair

Jill Fogolin
Director of Accreditation