May 4, 2016

Allen Calvin, Ph.D.
President
Palo Alto University
Pacific Graduate School of Psychology
1791 Arastradero Road
Palo Alto, CA 94304

Dear President Calvin,

At its meeting on April 7-10, 2016 the Commission on Accreditation conducted a review of the doctoral Ph.D. program in Clinical psychology at Palo Alto University, Pacific Graduate School of Psychology. This review included consideration of the program's most recent self-study report, the preliminary review of September 2, 2015 and the program's response to the preliminary review on November 16, 2015, the report of the team that visited the program on January 28-29, 2016, and the program's response to the site visit report on March 18, 2016.

I am pleased to inform you that, on the basis of this review, the Commission on Accreditation (CoA) voted to award accreditation to this program. In so doing, the Commission scheduled the next accreditation site visit to be held in **2023**. During the interim, the program will be listed annually among accredited programs of professional psychology in the *American Psychologist* and on the Accreditation web pages. The Commission also encourages you to share information about your program's accredited status with agencies and others of the public as appropriate.

Drs. Henry Buchtel, Clark Campbell, David Mather, MaryJan Murphy, Emil Rodolfa, Paula Kay Shear, and Dawn Vo-Jutabha recused and therefore did not participate in the discussion and vote on your program.

The Commission would like to provide the program with a summary of its review. This is provided below according to each of the accreditation domains. At the end of the letter, the program will be provided with an itemized list of any actions that the program needs to take prior to the next accreditation review.

Domain A: Eligibility
As a prerequisite for accreditation, the program's purpose must be within the scope of the accrediting body and must be pursued in an institutional setting appropriate for the doctoral education and training of professional psychologists.

The Clinical Ph.D. program at the Palo Alto University, Pacific Graduate School of Psychology aims to prepare students "to meet the highest standards of clinical practice and scholarly research

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in a changing healthcare environment" (self-study [SS], p. 1). The University is accredited by the Western Association of Schools and Colleges and regularly represents the program in its annual budget. The program requires students to complete a minimum of three full-time years of study, of which two must be in residence, and an additional year of internship in order to receive a degree. The program follows and makes available to students its current non-discriminatory policies and procedures.

The program is consistent with the provisions of this domain.

Domain B: Program Philosophy, Objectives and Curriculum Plan

The program has a clearly specified philosophy of education and training, compatible with the mission of its sponsor institution and appropriate to the science and practice of psychology. The program's education and training model and its curriculum plan are consistent with this philosophy.

The program provides training through the application of a practitioner-scientist model. This training is intended to foster a "career-long approach that interweaves psychological investigation, assessment, and intervention" (SS, p. 3). The curriculum is sequenced, graded in complexity, and provides adequate exposure to the broad and general foundations of the field. After students complete a year of practicum in the university's Gronowski Center, they are able to choose from a large number of external practicum sites. The program regularly monitors the quality of its external sites and their appropriateness in relation to the program's training goals. The internal practicum experiences educate students such that "external supervisors commented on the quality and preparedness of the [program's] students" (site visit report [SVR], Domain C.3).

The program has clearly specified minimal levels of achievements (MLAs) for its training goals, objectives, and competencies, and the required curriculum areas. In the curriculum area of *issues of cultural and individual diversity,* one of several MLAs is a passing score on the Clinical Oral Examination's item #6: Socio-cultural (SS, Appendix B, p. 27). In Table B.3 of the self-study, it appears that this passing score has a minimum threshold of 3: Satisfactory, whereas the proximal data for the Clinical Oral Exam Outcomes (SS, Appendix G, p. 24) lists the minimum passing score as both a 3: Satisfactory *and* a 2: Unqualified. The program notes that each student is assessed by two faculty members, yet it remains unclear why one faculty examiner would require a minimum score of 2 and the other would require a minimum score of 3. By **September 1, 2017**, the program is asked to clarify the passing score for item #6 on the Clinical Oral Exam and explain how that score ensures that students achieve and demonstrate competency in the area of individual cultural and diversity. Given the transition to the new *Standards of Accreditation* (SoA), the program is reminded that coverage and evaluation in this area must be consistent with the SoA.

Site visitors observed that the program appeared to offer "little systematic training in supervision" and that students learn about supervision primarily during practicum and training experiences (SVR, Domain B.3[c]). In response to the site visit report (SVR-R), the program revised the prior CLIN 895: Consultation and Program Evaluation course to ensure greater focus

on supervision. These revisions included the course name (now CLIN XXX: Supervision, Consultation, and Program Evaluation), course content, and the pacing of didactics (SVR-R, p. 3). The program provided a prospective syllabus for this course (SVR-R, Appendix V, pp. 1-11), which will begin in the fall semester of 2016. Additionally, the program is "working on providing a supervision workshop for students… and alumni" who have already completed the previous version of the course (SVR-R, p. 3). By **September 1, 2017** the program must demonstrate how its coverage in theories and methods of supervision meets the SoA (Section II.B). The program is reminded that beginning January 1, 2017 coverage in supervision must be consistent with the SoA.

Domain C: Program Resources
The program demonstrates that it has resources of appropriate quality and sufficiency to achieve its education and training goals.

The program's core faculty members are active, productive, and accessible to students. These faculty are sufficient in number to fulfill both their academic and professional responsibilities and focus on a variety of activities, such as research mentorship, dissertation advising, and clinical training (SVR-R, p. 6). All faculty appear to be suited and well-qualified to act as appropriate role-models for students in the program. The program admits a sufficient number of students each year whose previous experiences and current interests align with the program's training goals. Recent upgrades to the university's Research Library provide a wealth of accessible journals, books, and training videos to supplement student learning (SS, p. 18). Overall, there are adequate resources to promote timely completion of the program, including a variety of training materials, clerical and technical support, financial support, and other student services.

The program is consistent with the provisions of this domain.

Domain D: Cultural and Individual Differences and Diversity
The program recognizes the importance of cultural and individual differences and diversity in the training of psychologists.

The program engages in long-term efforts to recruit and retain diverse faculty, including advertising, formal and informal networking, offering a competitive salary and benefits, and formal mentorship between junior and senior diverse faculty members (SS, p. 19). In efforts to recruit diverse students, the program systematically collaborates with its host institution to create advertisements featuring diversity, sends recruiters to the northern and southern California Forum for Diversity Graduate Recruitment fairs, and assists prospective students with the cost of travel and lodging during the interview process (SS, p. 20). Retention efforts for diverse students include funding interest groups in diversity, creating an area of emphasis on diversity in the program's curriculum, and providing a number of fellowships, of which about half are awarded to diverse students (SS, p. 20). The program creates a supportive learning environment for diverse faculty and students. Site visitors reported that "the program has exemplified a strategic commitment to diversity and has integrated into its pedagogical model a strong engagement to

cultural and individual differences" (SVR, Domain D.1). The Commission commends the program for its efforts and accomplishments in this domain.

The program is consistent with the provisions of this domain.

Domain E: Student-Faculty Relations

The program demonstrates that its education, training, and socialization experiences are characterized by mutual respect and courtesy between students and faculty and that it operates in a manner that facilitates students' educational experiences.

Students are provided with a Student Handbook upon orientation to the program, which includes policies and procedures on program and institution requirements, student evaluation, and due process and grievance policies. The program ensures that students are provided with annual written evaluations that describe any difficulties, remediation plans, and written outcomes of student remediation efforts. Site visitors noted that some annual evaluations might be missing from files (SVR, Domain E.4), and in response the program has recently audited its files and devised a process to ensure future completion and retention (SVR-R, pp. 7-8). Recent efforts ensure that faculty are accessible to students and support timely completion of the program through active advising and mentorship. Faculty and students appear to enjoy respectful and collegial relationships and respect for and understanding of individual differences is apparent throughout the program (SVR, Domain E.1).

The program is consistent with the provisions of this domain.

Domain F: Program Self-Assessment and Quality Enhancement

The program demonstrates a commitment to excellence through self-study, which assures that its goals and objectives are met, enhances the quality of professional education and training obtained by its students, and contributes to the fulfillment of its sponsor institution's mission.

The program engages in regular review of its outcome measures and other feedback from students and alumni to evaluate its effectiveness in meeting its training goals and objectives. The program also engages in self-study to address student concerns, such as implementing an anonymous survey to assess and improve faculty accessibility (SS, p. 26). The program regularly reviews its goals and objectives in light of the university's training mission, local and national needs for services, national standards for practice, its graduates' accomplishments, and the evolving body of knowledge in the science and profession. Recent university efforts, including the implementation of a new database management system and the creation of the Office of Institution Research (SS, p. 32), have allowed the program to bolster its collection of data and alumni response rate.

Domain F.1(a): Outcome Data

The program, with appropriate involvement from its students, engages in regular, ongoing self-studies that address its effectiveness in achieving program goals and objectives in terms of outcome data (i.e., while students are in the program and after completion).

In response to previous feedback, the program has significantly expanded and refined its collection and presentation of data. The program has provided proximal data, collected from students as they progress through and complete the program, that are aggregated by cohort and correspond to program goals, objectives, and competencies (SS, Appendix G, Table F.1[b]). The program also collects distal data through annual alumni surveys that address graduates' perceptions of the program's efficacy in achieving its training goals and outcomes.

The program is consistent with the provisions of this domain.

Domain G: Public Disclosure
The program demonstrates its commitment to public disclosure by providing written materials and other communications that appropriately represent it to the relevant publics.

The program provides complete and accurate information to the public on its goals, objectives, training model, resources, and academic requirements. The provided information is current and sufficient to allow potential applicants to make informed decisions about the program.

The program's website accurately presents student outcome data, consistent with Implementing Regulation C-20. Please note that the program's public information will be reviewed on or after October 1 of each year to ensure that the disclosure data has been updated and is in compliance with the most recent version of IR C-20. The most current version of IR C-20 is attached for your information.

The program is consistent with the provisions of this domain.

Domain H: Relationship with Accrediting Body
The program demonstrates its commitment to the accreditation process by fulfilling its responsibilities to the accrediting body from which its accredited status is granted.

The program has been very responsive to previous CoA concerns and regularly responds to the Commission quickly and thoroughly. The program has kept CoA informed of substantive changes to the program, is in good standing in regard to payment of fees, and abides by all required policies and procedures. In the previous decision letter, the program was asked to respond to numerous questions and concerns in its next self-study. The Commission commends the program for its well-written and well-organized self-study and for clearly addressing all concerns from the previous decision letter.

The program is consistent with the provisions of this domain.

In order to keep the Commission informed of the program's commitment to the ongoing self-study process, the program is asked to address the following issue in a narrative response by **September 1, 2017** for formal review by the Commission:

- Clarify the MLA for item #6 on the Clinical Oral Exam and explain how that score demonstrates competence in issues of individual and cultural diversity, consistent with the SoA.

- Demonstrate how its coverage in theories and methods of supervision meets the SoA;

While these items are considered an addendum to the data provided in the Annual Report Online (ARO), they are not to be submitted online. The program's response to the items listed above should be identified as 'Narrative Response – Program Review' and mailed or faxed to the Office of Program Consultation and Accreditation by the designated due date(s).

The accreditation website (www.apa.org/ed/accreditation) provides important updates and policy changes related to the accreditation process. As an accredited program, we encourage you to periodically visit the website to remain current on all new accreditation policies. The Commission on Accreditation would also like to remind you that all accredited programs must inform the accrediting body in a timely manner of changes that could alter the program's quality. A copy of Implementing Regulation C-19 (Notification of Changes to Accredited Programs) is attached for your information.

Please note that at the time of your next self-study submission, your program will be reviewed under the new Standards of Accreditation (SoA). Additional information on the SoA and the 2017 implementation and transition to the new standards can be found on the accreditation website at http://www.apa.org/ed/accreditation/accreditation-roadmap.aspx. Please contact the Office of Program Consultation and Accreditation with any questions related to the SoA.

In closing, on behalf of the Commission on Accreditation, I extend congratulations to the faculty and students of the professional psychology program for their achievements. The Commission also expresses its appreciation for your personal commitment, and the corresponding support of your administration, to develop and maintain the best possible quality of graduate education and training in psychology. If the Office of Program Consultation and Accreditation may be of service at any time on administrative matters of accreditation, please call upon us.

Sincerely,

Jacqueline Remondet Wall, Ph.D.
Director, Office of Program Consultation and Accreditation

cc: William J. Froming, Ph.D., Provost
        James Breckenridge, Ph.D., Dean of Academic Administration and Operations
        Rowena Gomez, Ph.D., Director of Clinical Training
        Barry Rosenfeld, Site Visit Chair
        Donald Pope-Davis, Site Visit Member
        Joel Freund, Site Visit Generalist

C-19. Notification of Changes to Accredited Programs
(Commission on Accreditation, February 2005; revised October 2006)

In accordance with Domain H.2 of the *Guidelines and Principles for Accreditation* (G&P) and Section 4.7(b) of the *Accreditation Operating Procedures* (AOP), all accredited programs (doctoral, internship and postdoctoral residencies) whether under a single administrative entity or in a consortium, must inform the accrediting body in a timely manner of changes that could alter the program's quality.

The Commission on Accreditation (CoA) must be informed in advance of major program changes such as changes in model, degree offered, policies/procedures, administrative structure, faculty resources, supervision resources, area of emphases, or tracks/rotations. In the case of doctoral programs, this includes changes in the areas of emphasis. For internship/postdoctoral programs, this includes new, additional, or eliminated rotation or training sites. For example, consortium programs must inform the CoA of any substantial changes in structure, design or training sites.

Programs must submit to the Office of Program Consultation and Accreditation a detailed written description of the proposed change(s) and the potential impact upon the relevant accreditation domains. The CoA will review the program change(s) and may request additional information or a new self-study. In the case of a substantive change (such as a change in consortium membership), the Commission may also determine that a site visit is needed to assess whether the revised program is consistent with the G&P. Upon completion of this review, the Commission will note the proposed change and include the information in the next scheduled review or inform the program of any needed immediate additional actions.

The only exception to the policy of informing the Commission *in advance* is the occurrence of an unavoidable event beyond the reasonable control and anticipation of the program (e.g., educational/training site unexpectedly withdrawing from a consortium because of financial crisis; resources affected by a natural disaster). In such circumstances, it is incumbent upon the program to immediately inform the CoA in writing of the change and to include in its notification a proposed plan for maintaining program consistency with the G&P. The CoA will then proceed as above.

Consultation on program changes is available from the Office of Program Consultation and Accreditation.

C-20. Disclosure of Education/Training Outcomes and Information Allowing for Informed Decision-Making to Prospective Doctoral Students
(Commission on Accreditation, May 2006; revised November 2006; July 2007; July 2010; March 2012; April 2013; March 2014; May 2014)

Domain G of the *Guidelines and Principles for Accreditation of Programs in Professional Psychology* (G&P) requires that doctoral graduate programs provide potential students, current students, and the public with accurate information on the program and on program expectations. This information is meant to describe the program accurately and completely, using the most up-to-date data on education and training outcomes, and be presented in a manner that allows applicants to make informed decisions about entering the program.

The CoA requires accredited programs to update the data tables annually and post the information in its public materials (e.g. website) by October 1 each year. Failure to update the information is as much of a concern as failure to provide the necessary information in the required format. After October 1, the Commission will review programs' compliance with the below requirements and that the data provided are consistent with the program's data from the Annual Report Online (ARO).

Presentation of Required Information
To ensure that the required information for each program is available to the public in a consistent fashion, the following three provisions are effective **September 15, 2012:**

- The information must all be located in a single place and be titled "Student Admissions, Outcomes, and Other Data";
- If the program has a website, the information must be located no more than one-click away from the main/home doctoral landing page; and (see update to this provision below)
- The data must be presented in tables consistent with those listed at the end of this regulation. Programs may choose to provide other data to supplement the requirements of this regulation, but these tables must be provided. If the program chooses to provide supplemental information, it should be provided below the corresponding required tables.

In addition to the provisions already in effect, two additional requirements are effective **September 15, 2013:**
- The link from the main/home doctoral landing page to the required information must also be titled "Student Admissions, Outcomes, and Other Data";
- Table cells should not be left blank; instead, please enter a "0" if not applicable except where indicated in table

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Because the information required should include those education and training outcomes that will allow applicants to make informed and comparative decisions, the Commission requires that all doctoral programs minimally provide the following to prospective students in its public materials, **including its website, if it has one**: 1) time to program completion; 2) program costs (tuition and fees) and fellowships and other funding available; 3) internship acceptance rates; 4) student attrition rates; and 5) licensure outcomes. These are defined as follows:

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*For the purposes of this *Implementing Regulation,* only students that have had their doctoral degrees conferred on their transcripts are considered "graduates". "Time to completion" is the amount of time between the date of entry into the program and the date of program completion on the official transcript.

1. Time to Completion

Time to completion must be presented in two ways:

- First, programs must provide the **mean** and the **median** number of years that students have taken to complete the program from the time of first matriculation. These data should be provided for all graduates* in each of the past seven (7) years.
- Second, the program should provide the percentage of students completing the program in fewer than five years, five years, six years, seven years, and more than seven years.

In a text box below the table, programs must also note any admissions policies that allow students to enter with credit for prior graduate work and the expected implications for time to completion.

2. Program Costs

Programs are expected to make available the total costs per student for the current first year cohort. This information should include full-time student tuition, tuition per credit hour for part-time students, and any fees or costs required of students beyond tuition costs. For example, if a program requires students to travel to attend a mandatory component of the program, the estimated costs of this travel should be included as well. Programs may also provide information regarding current adjustments to tuition including, but not limited to: financial aid, grants, loans, tuition remission, assistantships, and fellowships. Even if program cost information is provided elsewhere on another university or other site, it must be provided in the doctoral program's materials as well.

NOTE: Please enter discrete dollar values in the Program Costs table and not percentages. For instance, if the program covers students' full costs within a category, please enter "$0" in that cell.

3. Internships

Programs are expected to provide data on students' success in obtaining internships. The program is required to report for **each** of the past seven (7) years:

- The total number of students who sought or applied for internships
- The number and percent of total who obtained internships
- The number and percent of total who obtained APA/CPA-accredited internships
- The number and percent of total who obtained APPIC member internships that were not APA/CPA-accredited *(if applicable)*
- The number and percent of total who obtained other membership organization internships (e.g., CAPIC) that were not APA/CPA-accredited *(if applicable)*
- The number and percent of total who obtained internships conforming to CDSPP guidelines (school psychology programs only) that were not APA/CPA-accredited *(if applicable)*
- The number and percent of total who obtained other internships that were not APA/CPA-accredited *(if applicable)*
- The number and percent of total who obtained paid internships
- The number and percent of total who obtained half-time internships *(if applicable)*

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*For the purposes of this *Implementing Regulation,* only students that have had their doctoral degrees conferred on their transcripts are considered "graduates". "Time to completion" is the amount of time between the date of entry into the program and the date of program completion on the official transcript.

NOTES: In calculating the above percentages, the program must base these on the **total number of students** who sought or who applied for internship in each year, including those that withdrew from the application process. To ensure readability and understanding for prospective students, Internship Placement-Table 1 and Internship Placement-Table 2 must be presented separately.

4. Attrition

Programs must report the number and percentage of students who have failed to complete the program once enrolled. These data should be calculated for each entering cohort by dividing the number of students in that cohort who have left the program for any reason by the total number of students initially enrolled in that same cohort. These data should be provided by cohort for all students who have left the program in the last seven (7) years or for all students who have left since the program became initially accredited, whichever time period is shorter.

5. Licensure

Reporting of program licensure data is an expectation of the US Secretary of Education's National Advisory Committee on Institutional Quality and Integrity for program accreditors, including the APA Commission on Accreditation. As such, programs must report the number and percentage of program graduates* who have become licensed psychologists within the preceding decade. In calculating the licensure percentage:

- The denominator is the total number of program graduates between 2 and 10 years ago

- The numerator is the number of these graduates (between 2 and 10 years ago) who became licensed psychologists in the past 10 years

- The licensure percentage, then, is calculated by dividing the number of graduates (between 2 and 10 years ago) who became licensed psychologists in the past 10 years by the number of graduates during the 8 year span from 2 to 10 years ago. For example, the figures reported by a program for 2014 would be number of graduates from the program between 2004 and 2012 who have achieved licensure in the past 10 years divided by the total number of students graduating from the program between 2004 and 2012.

Programs may clarify their licensure rate for the public in light of their training model and program goals and objectives.

*Please refer to footnote on first page of this *Implementing Regulation* for definition of graduates.

The following formatted tables are required to be placed in your public materials for data due October 1, 2015. These tables must be updated each subsequent year.

Time to Completion for all students entering the program

| Outcome | Year in which Degrees were Conferred | | | | | | | Total |
	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	
Total number of students with doctoral degree conferred on transcript	a							
Mean number of years to complete the program								
Median number of years to complete the program								

Time to Degree Ranges	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%
Students in less than 5 years	b	g														
Students in 5 years	c	h														
Students in 6 years	d	i														
Students in 7 years	e	j														
Students in more than 7 years	f	k														

Note: $(b+c+d+e+f) = a$ each year; $(g+h+i+j+k) = 100$ each year

Also, please describe or provide a link to program admissions policies that allow students to enter with credit for prior graduate work, and the expected implications for time to completion. Please indicate NA if not applicable:

Program Costs

Description	2015-2016 1st-year Cohort Cost
Tuition for full-time students (in-state)	
Tuition for full-time students (out-of-state)	
Tuition per credit hour for part-time students (*if applicable enter amount; if not applicable enter "NA"*)	
University/institution fees or costs	
Additional estimated fees or costs to students (e.g. books, travel, etc.)	

Internship Placement - Table 1

Outcome	Year Applied for Internship													
	2008-2009		2009-2010		2010-2011		2011-2012		2012-2013		2013-2014		2014-2015	
	N	%	N	%	N	%	N	%	N	%	N	%	N	%
Students who obtained APA/CPA-accredited internships	a	h												
Students who obtained APPIC member internships that were not APA/CPA-accredited (if applicable)	b	i												
Students who obtained other membership organization internships (e.g. CAPIC) that were not APA/CPA-accredited (if applicable)	c	j												
Students who obtained internships conforming to CDSPP guidelines that were not APA/CPA-accredited (if applicable)	d	k												
Students who obtained other internships that were not APA/CPA-accredited (if applicable)	e	l												
Students who obtained any internship	f	m												
Students who sought or applied for internships including those who withdrew from the application process	g	-		-		-		-		-		-		-

Note: $h = a/g$ x 100; $i = b/g$ x 100; $j = c/g$ x 100; $k = d/g$ x 100; $l = e/g$ x 100; $m = f/g$ x 100; $(a+b+c+d+e) = f$ each year; $(h+i+j+k+l) = m$ each year

Internship Placement - Table 2

Outcome	Year Applied for Internship													
	2008-2009		2009-2010		2010-2011		2011-2012		2012-2013		2013-2014		2014-2015	
	N	%	N	%	N	%	N	%	N	%	N	%	N	%
Students who sought or applied for internships including those who withdrew from the application process	g													
Students who obtained paid internships	n	p												
Students who obtained half-time internships* (if applicable)	o	q												

Cell "o" should only include students who applied for internship and are included in cell "g" from "Internship Placement ... Table 1."

Note: $p = n/g$ x 100; $q = o/g$ x 100

Attrition

Variable	Year of First Enrollment													
	2008-2009		2009-2010		2010-2011		2011-2012		2012-2013		2013-2014		2014-2015	
	N	%	N	%	N	%	N	%	N	%	N	%	N	%
Students for whom this is the year of first enrollment (i.e. new students)	a	-		-		-		-		-		-		-
Students whose doctoral degrees were conferred on their transcripts	b	e												
Students still enrolled in program	c	f												
Students no longer enrolled for any reason other than conferral of doctoral degree	d	g												

Note: $(b+c+d) = a$ each year; $(e+f+g) = 100$ each year

Licensure

Outcome	2005 to 2015
The total number of program graduates (doctoral degrees conferred on transcript) between 2 and 10 years ago	a
The number of these graduates (between 2 and 10 years ago) who became licensed psychologists in the past 10 years	b
Licensure percentage	c

Note: $c = b/a \times 100$