

Opening Remarks of the APA Commission on Accreditation
Before the National Advisory Committee on Institutional Quality and Integrity

September 23, 2026

APA Commission on Accreditation Chair Nicole D. Torrence, PhD

Thank you and good afternoon. My name is Nicole Torrence, and I am a clinical psychologist at the Chicago School. I'm here today in my volunteer capacity as Chair of the APA's Commission on Accreditation and my comments should not be interpreted as reflecting the views or positions of The Chicago School. I am joined by Dr. Doug Peterson, an associate professor in the Department of Psychology at the University of South Dakota and who serves in a volunteer capacity as the Commission's Associate Chair for Quality Assurance. I am also joined by Dr. Aaron Joyce, who is the full-time Executive Lead Psychologist for the Commission. He previously served as a psychologist at the VA. Finally, we are joined by the Commission's outside counsel, Mr. Joel Buckman, a partner at the law firm of Hogan Lovells Cadwalader.

The Commission exists to protect the American public throughout this country by supporting delivery of high-quality education and training in health service psychology. Health service psychology consists of individuals who are trained in clinical, counseling, or school psychology and very often become licensed mental health professionals. At a time when the nation faces a critical shortage of mental health professionals, the Commission is keenly aware of its obligation to expand access AND maintain an unwavering commitment to quality and rigor. Simply put: Every corner of the country deserves access to quality mental health professionals well-prepared to treat individuals from every background and with every presenting condition.

To that end, the Commission included with its petition for re-recognition a request to expand its scope to include both the distance education modality and accreditation of master's programs. The Commission learned during the pandemic that distance and hybrid education can be delivered effectively and increase innovation and access. Accrediting terminal master's programs is a key lever to reduce the cost of entering the profession, expand the health service psychology workforce, and improve access to psychological services, all of which promotes the goals of the Commission. We are pleased that the Final Staff Report recommends continued recognition and identifies the scope as including master's programs that will benefit students seeking to become psychologists and individuals seeking treatment.

The Commission views the re-recognition process as an opportunity for continuous improvement and growth and appreciates the feedback in the Final Staff Report. I would like to turn to my colleague, Dr. Peterson, who will address the items in the Final Staff Report.

APA Commission on Accreditation Association Chair, Quality Assurance Douglas Peterson, PhD

Good afternoon. I would also like to state that I am speaking today in my volunteer role as Co-Chair of the APA's Commission on Accreditation and not on behalf of the University of South Dakota or the South Dakota Board of Regents.

The Final Staff Report identified six criteria as "remaining issues". The Commission respectfully submits it demonstrated compliance or substantial compliance with all six.

For five of the six criteria – 602.20(a), 602.21(a)-(b), 602.26(b), (d), and (f) – the Final Staff Report explicitly acknowledged that the Commission already has submitted (in four cases) or has clear plans to submit (in one case) policy changes that will address the issues. We are glad to answer your questions about any of these.

For now, given time constraints, we want to spend a bit more time addressing one of the six – 602.19(b) – because the Final Staff Analysis alleged a new compliance concern we did not have a proper opportunity to address.

Section 602.19(b) asks whether the Commission has and effectively applies monitoring and evaluation approaches to identify problems with a program's continued compliance with accreditation standards. We submit the answer is "yes," even as we recognize we could make our monitoring and evaluation approaches more robust.

In the words of the Draft Staff Analysis, the Commission "uses several mechanisms for monitoring its preaccredited and accredited programs to identify problems with continued compliance", and the "file review clearly demonstrates the agency provides periodic monitoring as required by this section." The Draft Staff Analysis flagged only one concern under § 602.19(b): Because accreditation of master's programs was new at the time, the Commission had yet to develop objective student achievement metrics for monitoring master's programs (as it has for other program types). The Final Staff Report confirms the Commission addressed that concern, as it is collecting and evaluating data on time to completion, attrition, employment, and student-faculty ratio for master's programs.

That brings us to the new issue first raised in the Final Staff Report. The Report faults the Commission for being unaware of antisemitism allegations involving George Washington University's accredited doctoral program, which resulted in a U.S. Department of Education Office for Civil Rights investigation and a University-commissioned investigation by an outside law firm.

Let me start with our fundamental belief about which there should be no disagreement: Antisemitism is abhorrent, and we condemn it unequivocally. The Commission's standards prohibit discrimination against Jewish students. The Commission requires programs to maintain a supportive learning environment and to prepare psychologists to serve individuals from every background. The Commission is proud that it recently approved through a substantive change request, a program specifically designed to address the needs of the Orthodox Jewish community.

Had the Commission been aware of the antisemitism allegations at GWU, it would have assessed them in accordance with its standards and policies and taken any indicated action. In fact, we recently received a complaint of antisemitism and it is on the agenda for review at our next meeting in October.

We understand the concern that the allegations didn't come to our attention. We would have fully expected they would have given our extensive monitoring mechanisms. We've taken and are taking three actions in response. First, now that the allegations have come to our attention, we've requested a special report from the GWU program addressing the program's compliance. Second, we've conducted a preliminary review of the circumstances surrounding the reaccreditation of GWU's psychology program to assess whether there were gaps. Third, we've added to our upcoming meeting a more general discussion about ways to strengthen our monitoring and evaluation approaches.

Our initial assessment is the Commission did not know about the allegations because of a confluence of facts (as opposed to a structural problem with our procedures). Here's why:

- Although any student, faculty member, staff, or member of the public may file a complaint with the Commission anonymously, online, at any time, no one filed a complaint with the Commission about the allegations.
- The program completed its self-study in August 2021, **before** the OCR complaint was filed in January 2023. Although the Commission's self-study instructions require programs to identify all complaints involving the program, the self-study here did not address the issue.
- The Staff Report says it is "concerning" the Commission didn't know about the allegations because the respondent was a member of "Division 39" at the APA. However, as a matter of best practice, and as documented in the Commission's Implementing Regulations, the Commission has long maintained a wall of separation between the Commission and the APA. "Division 39" has nothing to do with the Commission or accreditation.
- And, in advance of NACIQI, we have checked with the APA and confirmed that the APA has not received antisemitism complaints about an accredited program that was misdirected to APA rather than the Commission.
- Finally, OCR issued a resolution letter and agreement involving the allegations in January 2025, before the Commission acted on the program in April. However, neither OCR nor GWU sent the resolution letter or agreement to the Commission.

All that said – and without in any way minimizing the seriousness of the allegations – we do not believe this one incident undermines the extensive evidence in the record of the Commission’s compliance with § 602.19(b).

In closing, we want to thank Department staff for their review and feedback and \ members of NACIQI for your service. The Commission values the recognition process, is committed to compliance and continuous improvement, and devoted to doing its part to deliver on the promise of high-quality psychology education programs so every American has access to the providers they need.

We respectfully request that NACIQI recommend continued recognition of the Commission and expansion of its scope to include Master’s programs. Let me share personally, as someone who is part of a program in the rural state of South Dakota. Without the federal recognition necessary for federal funding, it would be nearly impossible for my institution and many others in rural communities to provide high-quality training to students in a psychology program to serve the frontier via telehealth and address the opioid crisis.

Thank you.