

REPORT OF THE WSCUC TEAM

For Seeking Accreditation Visit 1

To: Institute of Contemporary Psychoanalysis
Los Angeles, CA

December 7-9, 2017

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The team evaluated the institution under the 2013 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.

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SECTION I – OVERVIEW AND CONTEXT

A. Description of the Institution and Visit

The Institute of Contemporary Psychoanalysis (ICP) was established in 1991 by twelve senior training analysts who had become concerned about limitations in the state of analytic training, which the founders perceived blocked the growth and diversity of psychoanalysis and its students. ICP's founding principles, which still guide its operations and development include: maintaining an independent, free-standing identity not affiliated with dominant disciplinary organizations, functioning as a participatory democracy of members and candidates (students), holding all members responsible for defending the preservation of all psychological perspectives, and cultivating a system of open dialogue, pluralistic thought, and academic freedom.

The Institute's primary education focus is training degree candidates in psychoanalysis. ICP also offers Psychoanalytic Psychotherapy Training programs and extension programs at various sites in California, as well as public educational conferences and in-house forums.

The Institute applied for Eligibility with the purpose of obtaining WSCUC accreditation in September 2015. The WSCUC Eligibility Review Committee (ERC) on December 8, 2015 granted ICP Eligibility and noted that the Institute needed to do further work and make further progress in a number of areas specified in the Eligibility Criteria. ICP submitted its Seeking Accreditation Visit 1 Institutional Report on September 25, 2017.

The WSCUC team onsite visit took place on December 7-9, 2017.

B. Quality and Rigor of Institutional Report

The institutional report submitted in preparation for the Fall 2017 SAV1 demonstrates ICP's seriousness of purpose and commitment to adapt the Institute at structural, operational, and cultural levels to the requirements of accreditation. Although new to WSCUC accreditation, ICP took pains, such as engaging a consultant to work on the preparation of the Institutional Report, to understand the expectations that come with accreditation. The report was comprehensive in responding to the Standards and Criteria for Review and was generally well supported with available documentation. As the team prepared for its visit, ICP was responsive in providing additional information that the team requested.

The team found that, true to its commitment to participatory democracy, ICP used a broadly consultative process to consider whether to seek accreditation. Once the Board of Directors had formally decided to seek accreditation, a WSCUC subcommittee was formed to contribute to the Institutional Report's preparation, a process that was driven by the ALO working with an external consultant. The report included a synthesis and reflections at the end of each Standard section, addressing two or three of the most important issues emphasized under that Standard. Areas of strength and improvement were also included, which attested to the institution's sincere efforts to understand how the seeking-accreditation process could enhance ICP's effectiveness in pursuing its distinctive mission within the psychoanalytic community. Given ICP's newness to the

accreditation process, the Institute is still in the early stages of considering how to come into compliance with WSCUC standards. Overall, the Institutional Report showed that ICP has used the self-review to come to a greater understanding of its effectiveness, systems of quality improvement, and student learning areas, although sometimes at an early level of development.

While the institutional reports established the foundation for the campus visit, the onsite interviews and discussions with a cross section of stakeholders provided additional information needed to answer outstanding questions and inform the team's findings.

During the site visit, the visiting team found a vibrant community of members, candidates, and staff, all deeply and passionately committed to ICP's distinctive mission and grappling with the Institute's future. The team was impressed that many of the ICP members we interviewed had a clear vision about how compliance with WSCUC standards could improve ICP's training and operational effectiveness.

The team acknowledges the Institute of Contemporary Psychoanalysis community's engagement in the accreditation process and the considerable time, energy, and money the community has invested in the process. The team makes special note of the generosity of the Institute's members who have contributed financially to help underwrite the expenses involved in seeking accreditation. The team appreciates most sincerely the community's openness in responding to questions and providing of additional materials as requested, as well as making the site visit a consistently pleasant experience. Given the voluntary nature of ICP's leadership and faculty and its

limited staff and budget resources, such unfailing hospitality is no small matter.

C. Response to Issues Raised in the Eligibility Review Committee Letter

In its December 14, 2015 letter, the WSCUC Eligibility Review Committee recommended that ICP attend to issues related to nine Eligibility Criteria. The team believes that ICP has met the Eligibility Review Committee's recommendations by providing a more current letter from the California Bureau for Private Postsecondary Education (Criterion 1; CFR 1.8) and demonstrating adherence to WSCUC's *Credit Hour Policy* (Criterion 5; CFR 2.2). The team further believes that ICP has demonstrated progress in addressing its leadership structure (Criterion 7; CFR 3.8), developing a strategic plan and planning process (Criterion 9, CFRs 3.4, 3.5, 3.7, 4.3, 4.6), implementing program review (Criterion 9; CFR 2.7), continuing its efforts in assessment in program review (Criterion 11; CFRs 2.3, 2.6, 2.7, 4.3, 4.4), and assessing and determining appropriate learning resources (Criterion 16; CFRs 2.2b, 3.5). However, the team believes that ICP must make much greater progress on these matters to substantially meet standards for accreditation, and the team provides further analysis and makes specific recommendations below where it discusses ICP's development relative to each of the Criteria for Review. Finally, the team believes that ICP has only begun to address the establishment of an independent Board of Trustees (Criterion 7; CFR 3.9), presenting aggregated and disaggregated retention, persistence, and graduation data (Criterion 10; CFR 1.2, 2.6, 2.7, 2.10, 4.2), clarifying roles,

responsibilities, and qualifications of faculty (Criterion 13; CFR 2.2b, 2.11, 2.12, 2.13), and clarifying student support resources (Criterion 14, CFR 2.10, 2.11, 2.12, 2.13). The team also provides further analysis and makes specific recommendations below where it discusses the specific CFRs related to these matters.

SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC’S STANDARDS

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

CFR 1.1 Formally approved, appropriate statements of purpose that define values and character

ICP’s published mission statement includes its commitment to psychoanalytic education as well as its values of promoting free inquiry, community, diversity, inclusion and dignity. The team believes that the institution is substantially in compliance with this Criterion.

CFR 1.2 Clear educational objectives; indicators of student achievement at institution, program and course levels; retention/graduation data and evidence of student learning made public

ICP members’ professional commitment to continued inquiry and formation in contemporary psychoanalysis permeates the Institute. All the students (candidates) are licensed practitioners; many have terminal degrees. The Institute is dedicated to providing candidates and members a vibrant professional community for ongoing learning and professional development, through their 4-year degree program (Psy.D.) as well as through their extension programs in Los Angeles and satellite locations, psychotherapy training, conferences and symposia. While the 4-year degree program remains a primarily on-ground program, ICP has invested in teleconferencing

equipment and software to also enable distance access to some classes, meetings, presentations and symposia. The team characterizes ICP's institutional research function as nascent and not yet sufficient for candidacy.

- *As part of its work toward accreditation, the Institute will need to work on regularly tracking indicators of student achievement and competency attainment at the institutional, program and course level, as well make public retention and graduation metrics for its degree program.*
- *Professional development in this area is recommended.*

CFR 1.3 Academic freedom: policies and practices

ICP's founding was principally motivated largely by the original members' concern that psychoanalytic training was excessively rigid and restrictive. The Institute incorporates academic freedom in its bylaws and has established an Academic Freedom Policy. The team believes that ICP is substantially in compliance with this Criterion.

CFR 1.4 Diversity: policies, programs, and practices

ICP, from its inception, has been clearly committed to promoting diversity in the psychoanalytic community. The Institute has a well-articulated Diversity Statement, and it has formed a diversity committee and a Task Force to Combat Racism and Homophobia. In particular, it has addressed perceptions of psychoanalysis among people of color and the LGBTQ community. ICP offers an Ethnic Minority Scholarship, has adapted its curriculum to address diversity issues, and offers training for its members to more effectively engage diverse groups.

The Institute is in the early stages of gathering disaggregated data to help it understand the experiences of ICP's candidates. Additionally, the team is struck that, despite ICP's obviously sincere commitment to diversity, its members and candidates do not fully reflect the diversity of our society. The team believes on this Criterion ICP is qualified for candidacy.

- *As ICP develops its institutional research capacity, it should gather and analyze disaggregated data that will help it better understand and serve its members and candidates.*
- *As ICP develops and implements a strategic enrollment plan, it should intentionally address diversity in its candidate recruitment strategy.*

CFR 1.5 *Education as primary purpose; autonomy from external entities*

ICP is not affiliated with any governmental, corporate, or religious entity. Its principal *raison d'être* is to autonomously pursue its distinctive vision of psychoanalytic education and training. Its members and candidates govern the Institute through an internal Board of Directors. Its primary activities are to provide a degree program for its candidates, Psychoanalytic Psychotherapy Training, and extension programs. The team believes that ICP is substantially in compliance with this Criterion.

CFR 1.6 *Truthful representation to students/public; fair and equitable policies; timely completion*

ICP represents its academic goals, policies, services, and costs on its website. A clear

and realistic pathway allows candidates to complete its degree program in a timely fashion. Candidates receive regular evaluation and feedback about their progress through ICP's candidate progression process.

The visiting team is concerned that, while it presents accurate information about tuition, the Institute does not present estimates for the cost of analysis and supervision, which represent the greater part of the cost of completing the degree program. The team believes that ICP does not yet qualify for candidacy on this Criterion.

- *ICP will need to make visible the estimated total cost of the program including tuition, analysis and supervision.*

CFR 1.7 Operational integrity; sound business practices; timely and fair responses to complaints; evaluation of institutional performance

ICP's Treasurer prepares a budget recommendation for approval of the Board of Directors. In addition, the Treasurer provides the Board with monthly financial reports. An external firm conducts annual audits. An Ethics Committee operates under the guidance of an Ethics Code, which is currently under revision, to provide guidance and support in addressing complaints and grievances. ICP has also established an Ombudsman Office to facilitate solutions to concerns and issues raised by candidates, members, faculty, or staff. The visiting team is concerned that the process for dealing with concerns and complaints is informal and pathways for pursuing concerns or complaints are unclear. As addressed below, business practices, including evaluations

of institutional performance require articulation and consistent implementation. The team believes that ICP is at a nascent stage in developing these capacities.

- *ICP should review its ability to respond to candidates' concerns and provide clear pathways for dealing with potential complaints. It is especially important in a close-knit community to ensure that potential complainants have access to procedures that are private, confidential, neutral, and unbiased.*

CFR 1.8 *Honest, open communication with WASC including notification of material matters; implementation of WASC policies*

As an institution seeking accreditation and one that has faced a steep learning curve as it encounters the culture of accreditation, ICP has been forthright in pursuing the seeking accreditation process and responsive to requests from the Commission and from the visiting team for information. ICP submitted an Institution Summary Report in April 2017. The visiting team believes that ICP's performance has been sufficient for candidacy according to the Criterion. However, the team notes with some concern ICP's incomplete response to the clear recommendations made by the Eligibility Review Committee (ERC) in its December 8, 2015 letter. For at least one-third of the ERC's recommendations, the team found that ICP had made little progress. The Institutional Report does not directly address the institution's response to each recommendation.

Standard 2: Achieving Educational Objectives through Core Functions

CFR 2.1 *Programs appropriate in content, standards, degree level; sufficient*

qualified faculty

ICP presents a unique psychoanalytic curriculum grounded in contemporary psychoanalytic theory. The PsyD program, which retains the essential elements of traditional psychoanalytic training, is appropriate in content, standards of achievement, and rigor. A national accrediting body for psychoanalytic graduate education, the Accreditation Council for Psychoanalytic Education (APCE) recently reviewed the program. ACPE's final report is not yet available, but the feedback provided by the APCE Review Team at the end of the visit was very positive. ICP has already responded to the review by addressing lacunae in its curriculum. All faculty are practicing psychoanalysts with terminal graduate or professional degrees suitable for the courses taught. New faculty work with senior faculty in an apprentice model as they begin teaching. Faculty are engaged in research activity and actively publish and present at professional conferences. The team believes that ICP meets this Criterion on a level sufficient for initial accreditation.

CFR 2.2a Clearly defined degrees re: admission requirements and levels of achievement for graduation; processes to ensure meaning, quality and integrity of degrees – Undergraduate degree requirements, including general education and core competencies

This Criterion is not applicable because ICP does not offer undergraduate programs.

CFR 2.2b Clearly defined degrees re: admission requirements and levels of

achievement for graduation; processes to ensure meaning, quality and integrity of degrees – Graduate degree requirements clearly stated

The admission requirements and levels of achievement for graduation in the PsyD program are clearly defined and are represented on the ICP website and various Institute documents. ICP has discontinued its PhD program, and only one student is still in progress. Application for candidacy is limited to licensed mental health professionals and Research Psychoanalyst candidates. Faculty members indicated that a certificate is an option for those who do not complete degree requirements for the PsyD, but this information is not clear in public materials and there seems to be some confusion among faculty and staff about this option. While the team believes that ICP meets this Criterion on a level sufficient for initial accreditation, the team encourages ICP to clarify the PsyD degree program vs. certificate options available to students in their materials and on their website.

CFR 2.3 Student learning outcomes (SLOs) and expectations for student learning at all levels; reflected in curricula, programs, policies, advising

Student learning outcomes are clearly stated at the institutional level through the well-regarded and path-setting Core Psychoanalytic Competencies (CPCs). ICP plans to articulate course-learning outcomes (CLOs) on each course syllabus and connect those CLOs to the CPCs, but has not yet done so. Similarly, ICP has not yet completed its plan to articulate how the non-seminar requirements of the degree program address

CPCs. The Institute has not articulated the difference between the PsyD program and the certificate in terms of mastery of the CPCs. Faculty have generally embraced the CPCs and are working to reflect them in the learning environment of the institution, but need to be brought fully “in the loop” about comprehensive assessment and program review. The team believes that ICP meets this Criterion on a level sufficient for candidacy and encourages ICP to continue its progress.

- *ICP will need to include course learning outcomes on each course syllabus that indicate which of the core psychoanalytic concepts is being introduced, developed, or mastered in each course.*
- *ICP will need to indicate which of the core psychoanalytic competencies is being introduced, developed, and mastered in each of the non-course requirements (personal analysis, control cases) of the degree program.*
- *ICP will need to make clear the difference in learning outcomes between the PsyD degree and the certificate in psychoanalysis (i.e., which of the core psychoanalytic concepts is mastered in each program).*
- *ICP will need to develop a multi-year program review process as a major initiative.*

CFR 2.4 Faculty’s collective responsibility for setting SLOs and standards, assessing student learning, demonstrating achievement of standards

The faculty, operating through two key committees, developed the core

psychoanalytic competencies (CPCs) as program learning outcomes for the PsyD degree. ICP has not yet developed nor implemented a plan for assessing or demonstrating student achievement of those outcomes. It is not clear that the faculty as a whole have coalesced to address the development of a comprehensive assessment plan or a multi-year program review process. The team believes that ICP does not meet this Criterion at a level sufficient for candidacy.

- *ICP will need to develop a curriculum map that depicts how students will achieve each of the core psychoanalytic competencies.*
- *ICP will need to develop and implement a plan for assessing each of the core psychoanalytic competencies.*
- *ICP will need to demonstrate that students are achieving the core psychoanalytic competencies.*
- *ICP will need to show that decision-making and program change are based on results of assessment of student learning.*
- *ICP will need to support professional development to develop the faculty capacity for effective assessment of student learning.*

CFR 2.5 Students actively involved in learning and challenged; feedback on learning provided

Students are actively involved in learning experiences in courses, psychoanalytic

control cases, and personal psychoanalysis. They are especially energized by ICP's emphasis on contemporary theories of psychoanalysis. The learning environment is rich and dynamic; students are challenged and are intensely engaged with course materials and with integrating classwork together with their clinical work and experiences. Students receive personal feedback from courses, clinical supervisors, and advisors about their progress through the degree program. The team believes that ICP's performance under this Criterion is sufficient for initial accreditation.

CFR 2.6 Graduates achieve stated levels of attainment; SLO embedded in faculty standards for assessing student work

Faculty have embraced the recently developed core psychoanalytic competencies (CPCs) but have not yet integrated them into their courses and the required clinical activities for the degree. Faculty are beginning to incorporate the CPCs into their assessment of student work, but still need to find ways to measure these competencies. Because ICP is not yet collecting student-learning in relation to the CPCs, no information is available about graduates' levels of attainment of CPCs.

ICP's Candidate Progression Committee actively and rigorously tracks the progress of individual students through their 4-year residency.

The program's capstone requirement is a doctoral dissertation. Candidates have the option of completing the dissertation in one of two formats. ICP has not articulated how

to use the capstone for assessment of mastery of the Core Psychoanalytic Competencies. The team believes that ICP has not made sufficient progress under this Criterion to move to candidacy.

- *ICP faculty will need to fully integrate the core psychoanalytic competencies into courses and required clinical activities, and the dissertation, making clear which CPCs are targeted in each course/activity, and how the student learning outcomes for the course/activity map onto the CPCs.*
- *ICP faculty will need to assess student attainment of student learning outcomes in courses and clinical activities so that graduates' attainment of CPCs can be reported.*

CFR 2.7 Program review includes SLOs, retention/graduation data, external evidence and evaluators

ICP recently invited the Accreditation Council for Psychoanalytic Education (APCE) to visit the institution and review its programs. The ACPE's initial feedback about the program curriculum and training, as well as the core psychoanalytic concepts, was very positive. However, ICP does not have data about retention, persistence, and graduation rates for its students. A plan and process for comprehensive external program review has not yet been developed or implemented. The team believes that ICP has not made sufficient progress

under this Criterion to move to candidacy.

- *ICP will need to develop and implement a plan for program review, including the process and timeline for external review. The Institute should consider engaging experienced external support and advice as it develops its program review process.*
- *ICP will need to develop a plan for institutional research that provides student retention and graduation data for periodic review by external evaluators.*
- *ICP will need to support professional development to develop the faculty capacity for effective assessment of student learning*
- *Develop a curriculum map and an assessment plan for the core psychoanalytic competencies CPCs and begin implementation of the assessment plan.*

CFR 2.8 *Scholarship, creative activity, and curricular and instructional innovation for both students and faculty valued and supported*

Faculty clearly model scholarship and clinical expertise in their numerous conference presentations and published articles, however, ICP has no codified expectations of faculty in relationship to their scholarship and creative activity. The team believes that under this Criterion ICP meets the standard for initial accreditation.

CFR 2.9 *Faculty evaluation links scholarship, teaching, student learning, and service*

Intensive engagement of the faculty in conferences and publishing in psychoanalytic journals not only models community involvement, but gives students opportunities to

join in presentations and/or co-author articles with senior faculty at early stages of their career. The democratic participatory model of governance also fosters these important links. However, faculty evaluation is performed principally by the Curriculum Committee on the basis of course evaluations. No clear evaluative criteria refer to scholarship. The team does not believe that ICP meets this Criterion at a level sufficient for candidacy.

- *ICP should explicitly identify in appropriate faculty materials the expected relationship between scholarship, teaching, and assessment.*
- *In the service of strengthening the faculty body the Institute will need to develop and publish clear faculty evaluation criteria, including expectations regarding publication, conference presentations and Co-Curricular offerings.*

CFR 2.10 Institution identifies and supports needs of students; tracks aggregated and disaggregated student achievement, satisfaction and campus climate; demonstrates students' timely progress

While the Candidate Progression process is well established and provides exemplary individual-level guidance and feedback to candidates, ICP has not yet implemented the capacity to systematically track aggregated and appropriately disaggregated data or a process to evaluate and respond to such data. The team views its progress in meeting this Criterion as nascent.

- *ICP will need to establish clear, regular and formal approaches to identify student needs and assess campus climate, including clear procedures to respond to its*

findings.

- *ICP will need to develop its institutional research capacity to systematically track, analyze, and make available aggregated and disaggregated data about student progress and achievement.*

CFR 2.11 *Co-curricular programs aligned with academic goals and regularly assessed*

ICP offers continuing education programs designed to support the development of members and candidates, this includes a recently initiated symposium series. Learning objectives are established for continuing education programs and attendees who wish CEU credit complete a post test and data are analyzed. It is not clear how evaluation data and analysis are used for planning. The visiting team believes that ICP's performance under this Criterion is sufficient for candidacy.

- *ICP will need to “close the loop” by demonstrating how it uses data analysis about these events to inform planning future events.*
- *ICP will need to align and integrate the assessment of co-curricular events with its developing program to assess its curricular programs.*

CFR 2.12 *Institution provides useful and complete program information and advising*

Candidates are provided information about the program throughout the admissions and orientation processes. Each candidate is assigned a member who serves as an adviser. Advisers are supported by an advising manual, but are not systematically evaluated.

The Candidate Progression system provides regular feedback to candidate. The team did note some confusion among students about a curricular change that allows candidates to gain certification as a psychoanalyst without completing the final dissertation/project requirement for the Psy.D. The team believes that, under this Criterion, ICP's performance is sufficient for candidacy.

- *ICP should consider a process to evaluate the effectiveness of advisers.*

CFR 2.13 *Appropriate student support services planned, implemented, and evaluated*

The ERC letter found that it could not easily determine the levels of institute-supported and dedicated resources to address student needs. The letter recommended that ICP clarify student support services provided and available to meet students' needs. The team also found that student support services were not clearly defined and that pathways for students to access support services were not well marked.

It is understandable, given ICP's organizational structure and mission, the close relationships among candidates, faculty, and members, the distinctive nature of the body of candidates (practitioners with advanced degrees) and the small scale of the ICP community, that ICP would not have very formally articulated support services. The Disability Policy, for example, commits ICP to providing reasonable accommodations, but is silent about a process for determining reasonable accommodations or establishing responsibility to ensure that such accommodations are provided. The team

does not believe that ICP's progress on this Criterion is sufficient for candidacy.

- *The visiting team recommends that ICP conduct a fundamental re-evaluation of support services to determine appropriate services for its candidates, including appropriate assignment of responsibility for planning, providing, and evaluating student services.*

CFR 2.14 *Appropriate information to, and treatment of, transfer students (if applicable)*

ICP does not accept transfer students from other psychoanalytic institutes.

Occasionally, students who have been enrolled at other institutes are accepted as new candidates. The Board of Directors is reviewing the Institute's process for considering waivers of requirements for such candidates. ICP should provide information about any changes in this policy in future reports.

Standard 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

CFR 3.1 *Sufficient, qualified and diverse faculty and staff to support programs and operations*

ICP's faculty are part-time and volunteer, as is typical at psychoanalytic institutes. The Institute, acting through the Curriculum Committee, consistently draws well-qualified instructors to offer its seminars. In the future, ICP may face challenges, including diversifying its faculty, developing younger faculty members, and adapting to a changing

membership profile with members residing outside California and, indeed, outside the United States.

The visiting team is far more concerned about the adequacy of staff to support programs and operations. Given the Institute's limited budget resources, it has operated with minimal, although highly impressive, staff support. In the team's view, staff support is not sufficient for candidacy. As ICP moves toward accreditation, it will need improved staff support for a number of critical functions. The visiting team does not believe that ICP has made sufficient progress under this Criterion for candidacy and makes the following recommendation.

- *ICP needs to develop and implement a staffing plan that can ensure operational effectiveness with particular focus on institutional research, enrollment management and financial management.*

CFR 3.2 Faculty and staff policies, practices and evaluation well developed and applied

Faculty professional relations are conducted primarily by the Curriculum Committee, which is responsible for recruiting faculty, assigning faculty to courses, and assessing faculty member's teaching performance.

The visiting team does not believe that ICP's performance on this Criterion is sufficient for candidacy. The primary source of information for faculty evaluation appears to be student (candidate) evaluations of courses. The limitations of relying on course

evaluations are well known. In its Institutional Report, ICP suggests that it may be desirable to develop a peer review process for instructors.

ICP provided little information about staff policies, including staff evaluation. As the demands on the Institute's staff members seem likely to proliferate with the implementation of the Salesforce data platform, enhanced development efforts, and more professional enrollment and financial management, ICP should also develop and implement clear staff policies, including evaluation policies.

- *ICP should review its policies for evaluation of faculty, staff, and administration with an eye to establishing a process that is consistent with best practices, including multisource feedback, appropriate peer review, and clearly defined evaluative measures.*

CFR 3.3 Faculty and staff development planned, implemented, and evaluated

Faculty development at ICP is provided through co-curricular programs that are designed to enhance the overall professional skills of members. An annual new teacher training has recently been implemented. New instructors in core courses are also paired to co-teach with experienced instructors. The team again notes that ICP's materials provide little information about staff development programs.

The visiting team was struck by the quickness with which ICP faculty understood and appreciated the potential benefits for learning assessment and program review. On the other hand, the team noted a gap between the language of professional norms and

practices generally shared in higher education, including norms and practices related to teaching learning, and the shared discourse of the psychoanalytic community. As learning assessment based on the Core Psychoanalytic Competencies develops and takes root and as program review matures at ICP, it will be necessary to provide targeted development opportunities so that faculty can implement the full assessment cycle. The visiting team does not believe that ICP's faculty and staff development practices are yet sufficient for candidacy.

- *ICP will need to develop and implement a staffing plan that can ensure operational effectiveness with particular focus on institutional research, enrollment management and financial management.*
- *Faculty development opportunities should be planned, implemented, and evaluated in order to bridge the gap with norms and practices of higher education in areas including teaching and learning, learning assessment, and program review.*

CFR 3.4 *Financial stability, clean audits, sufficient resources; realistic plans for any deficits; integrated budgeting; enrollment management; diversified revenue sources*

ICPs operating model is based on a volunteer model that for many years has kept costs minimal and allowed it to offer its programs at a modest tuition fee, additional revenue from extension programs, and membership fees. As it seeks accreditation, ICP is

entering a new phase of organizational development that may strain its financial resources. The Institute needs to carefully assess its business model to determine its capacity to support change and growth.

During the site visit, ICP provided the team with updated financial projections, and a revised strategic plan. Based on the team meeting with a member of the Strategic Planning Committee and separate meetings with the Board of Directors, it appears ICP is struggling to assign responsibility and maintain accountability for implementing the plan. Additionally, strategic goals are disconnected from financial planning. In its revised 5 and 10-year budget projections, ICP forecasted revenue growth with an increase in contingency costs; however, the budget projections presented to the team appear to rely on optimistic assumptions that revenue from grants and increased enrollment will grow steadily. The organization lacks a solid development plan for obtaining grants nor does it demonstrate a historical record of securing grant funding at the level presented in these forecasts. Additionally, ICP lacks a strategic enrollment plan. It concerns the team that ICP has made little progress in addressing the Eligibility letter's recommendation that "ICP develop and present a strategic enrollment and financial plan." The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to refine its financial projections and substantiated then with realistic enrollment projections and financial modeling to include an examination of tuition rates at peer institutions, greater analysis of potential enrollment,*

contingencies for fluctuations in enrollment and membership, conservative grant estimates and contingencies for the possibility of not obtaining grant funding and a more refined analysis of future costs with appropriate contingency.

- *ICPs strategic plan needs to be more fully integrated with its financial planning and identify responsible parties to follow through with action steps.*

3.5 Facilities, services, information and technology resources sufficient and aligned with objectives

ICP is located in a bright, inviting leased space. Classrooms and administrative offices appear sufficient for its current size. However, should enrollment grow as projected, current facilities may no longer be adequate.

ICP recently obtained use of a cloud-based, customer-relations management database (Salesforce) to manage its membership, student enrollment, and other data. The team received an overview of the database's planned functionality. The organization is currently in the early phases of implementing this system, and the team cannot determine its likely effectiveness. The team is concerned about whether ICP is prepared to adequately support use of Salesforce and integrate it with various critical academic functions. Facilities, services, and information technology appear to provide limited capacity to meet enrollment projections and sustain operational functions.

ICP maintains a small physical library and subscribes to an online database of psychoanalytic journal literature (PEP). In addition, ICP has made arrangements for

candidates to have access to holdings at sister institutions. Students have access to limited computer services. The team is concerned that ICP does not yet provide candidates access to resources needed to create a “doctoral culture.” The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to continue its investment in technological resources for both its administrative functioning and its students’ academic research and development.*
- *ICP needs to analyze its physical site and resources to assess its capacity to meet enrollment projections.*
- *ICP should review how to provide additional scholarly resources, including the possible appointment of a research librarian, commensurate with doctoral level research.*

CFR 3.6 Leadership operates with integrity, high performance, responsibility, and accountability

The members of the Board of Directors are deeply invested in the principles and practices of contemporary psychoanalysis and committed to the Institute as a community of practice and intellectual engagement. However, as the Institute’s culture of democratic governance suggests that everyone is accountable to everyone, specific roles and areas of accountability are less defined.

A pervasive lack of data hampers the capacity for evidence-based decision-making and evaluation.

Furthermore, there is currently no process for evaluation of the CEO. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to develop observable performance metrics and evaluation processes for key leadership positions including the CEO and CFO.*

CFR 3.7 Clear, consistent decision-making structures and processes; priority to sustain institutional capacity and educational effectiveness

ICP prides itself on its commitment to collaborative practices and participatory governance as foundational principles. Decision-making authority resides with the Board of Directors, operating in consultation with a network of committees, such as a finance committee and a curriculum committee. The Directors pride themselves on transparency and collaboration, with committees represented on the Board of Directors, and elected CEO and CFO accountable to the membership. However, while committees and the Board of Directors meet regularly for substantive deliberation, communication with the rest of the faculty appears spotty. The team noted disconnects between planning, enrollment and budget development. Goals do not appear to be clearly quantified or supported with concrete plans, e.g. to analyze enrollment patterns, support planning and educational effectiveness. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to clarify the decision-making roles and areas of accountability of the CEO, CFO, Board of Directors and Board of Trustees.*

CFR 3.8 Full-time CEO and full-time CFO; sufficient qualified administrators

Since the Eligibility letter of December 2015, ICP has moved away from the co-president model and appointed a single CEO.

ICP's CEO and the Treasurer are both currently volunteer positions. While these individuals each exhibit deep personal commitment as members of ICP, the team heard capacity concerns that the current model relies heavily on the same volunteer to continually sustain the CFO functions. The team also noted gaps, such as integrating budget development with strategic goals and adhering to US Department of Education and WSCUC regulations regarding publicly disclosing the total cost of attendance. The team identified the finance function as an area of institutional vulnerability. A robust review of administrative structure is in order. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

The institutional research function is nascent. A full-time staff member has been hired with responsibility for a broad combination of administrative support, institutional research, marketing and development, and is supported by a part-time technical support staff leading the implementation of a student information system.

- *WSCUC standards call for the appointment of a CEO and a CFO. These should be separate positions, each dedicated to the institution. The job descriptions, areas of accountability and evaluation processes should be clear and approved by the Board of Trustees. The CFO position may include additional functions at the Institute. The team recommends professional development for the appointed*

individuals to ensure familiarity with higher education requirements and best practices.

- *Given the pervasive need for data to support all academic, enrollment and financial functions, the team recommends that the Institute continue to develop the Institutional Research capacity to collect, analyze and interpret data to support planning and decision-making and reporting.*

CFR 3.9 Independent governing board with appropriate oversight, including hiring and evaluating CEO

ICP is in the process of forming a Board of Trustees (BOT). They have drafted bylaws and reached out to some potential members. They envision a BOT comprised of the CEO, the Treasurer and three to five additional members with finance, education and legal expertise. They are proposing to organize the BOT into five committees: Finance, Audit, Academic Affairs, Advancement, and Nominating. The team ascertained that the community can see value in bringing in additional and broader expertise “to help” through the BOT, but noted that the specific division of roles and authority will need further clarification.

ICP’s CEO is elected by the members for a renewable two-year term. Once a BOT is established, the BOT will have the authority to approve or not approve the elected CEO nominee, evaluate the CEO, and terminate the CEO. The BOT may also want to review the staffing model and evaluate whether the practice of electing a CEO for a two-year term best supports the Institute’s long-term effectiveness, accountability, and strategic

goals.

- *ICP will need to establish an independent Board of Trustees with clear roles and oversight.*
- *ICP should reflect deeply on how the establishment of a BOT will change the historic role of the Board of Directors and that of the CEO, and define the process for interaction between the BOT and other key members of the leadership. It would be essential to clarify the size of the BOT and expectations of individual BOT members and the BOT as a whole before confirming nominees.*

CFR 3.10 Effective academic leadership by faculty

All members of the Institute are trained as psychoanalysts. Faculty are analysts who teach as volunteers. In addition, they can serve as supervisors and mentors. As members of the Institute, some serve on ICP committees, such as the Candidate Progression Committee or the Curriculum Committee, although there is no regular faculty meeting to connect faculty to one another or stay abreast of institutional updates or jointly work on assessment projects. The team noted faculty interest in forming a structure for such exchange and collaboration. The team believes that ICP's performance under this Criterion is sufficient for candidacy.

- *The team recommends that ICP to create systems and structures to facilitate faculty development, integrate governance, coordinate assessment and apprise faculty of institutional developments.*

Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

CFR 4.1 *Quality-assurance processes in place to collect, analyze, and interpret data; track results over time; use comparative data; and make improvements*

Program learning outcomes (CPCs) have been developed, and faculty are beginning to incorporate them into their teaching and supervision. However, ICP has not yet developed and implemented a plan for collection, analysis, and interpretation of student learning data. Aggregated and disaggregated data about student learning is not available and, consequently, assessment results are not being used to make instructional improvements. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to develop and implement a plan for assessment of student learning.*
- *ICP will need to utilize results of assessment of student learning to make program improvements.*
- *ICP will need to develop the institutional research capacity to collect, analyze and interpret data to support planning and decision-making and reporting.*

CFR 4.2 *Sufficient institutional research (IR) capacity; data disseminated and incorporated in planning and decision-making; IR effectiveness assessed*

ICP does not systematically collect and report institutional research and such

data are therefore not incorporated into planning and decision-making. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to sufficiently staff institutional research efforts so that data can be periodically disseminated and used in planning and decision-making.*

CFR 4.3 Commitment to improvement based on data and evidence; systematic assessment of teaching, learning, campus environment; utilization of results

While faculty consistently express commitment to collection and utilization of student learning data, ICP does not yet systematically assess teaching, learning, and campus environment. Students evaluate courses and instructors at the end of each term, but no other formal evaluation of teaching is conducted. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to develop and implement a plan for assessing teaching, learning, and the campus environment.*

CFR 4.4 Ongoing inquiry into teaching and learning to improve curricula, pedagogy, and assessment

ICP students are enthusiastic about learning and think very highly of the faculty

and the program. Faculty informally discuss curricula and pedagogy but no systematic inquiry into teaching and learning currently exists.

- *ICP will need to develop and implement methods for systematically reviewing teaching and learning to strengthen curriculum and pedagogy.*

CFR 4.5 *Appropriate stakeholders involved in regular assessment of institutional effectiveness*

Faculty have collaboratively developed the core psychoanalytic competencies, which serve as program learning outcomes, but have not yet developed or implemented a plan for assessment of institutional effectiveness. Students and staff are not engaged in assessment of institutional effectiveness. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to include faculty, staff, students, and, when formed, the Board of Trustees, in regular assessment of institutional effectiveness.*

CFR 4.6 *Reflection and planning with multiple constituents; strategic plans align with purposes; address key priorities and future directions; plans are monitored and revised as required*

ICP faculty, staff, and students are fully committed to psychoanalytic education. However, they have not yet developed and implemented a comprehensive strategic plan that addresses, for example, future demands

for students, the option of online education, and the inclusion of increasing numbers of international students. A plan for monitoring and revising the strategic plan has not been implemented. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP will need to develop and operationalize a comprehensive strategic plan with a multi-year enrollment plan, a realistic development plan, and multi-year operating budgets.*
- *ICP will need to develop and implement a plan for monitoring and revising the strategic plan.*

CFR 4.7 Anticipating and responding to a changing higher educational environment

ICP is seeking accreditation in response to SB 1247, under which the Bureau for Private Post-Secondary Education now requires all degree-granting institutions to gain accreditation through a U.S. Department of Education approved agency.

Seeking accreditation from WSCUC has drawn ICP into a new arena of concern about learning assessment, student success, program planning and review, organizational sustainability, and more. ICP faculty are engaged with current and developing trends in psychoanalytic education, but are not as connected with the broader field of higher education and its emerging trends. The team finds that ICP has not made sufficient progress to advance to candidacy under this Criterion.

- *ICP faculty will need to engage with the broader higher education environment in*

order to effectively adjust and respond to changes and trends.

SECTION III -- PREPARATION FOR ACCREDITATION UNDER THE 2013 HANDBOOK OF ACCREDITATION

A. Degrees Programs: Meaning, Quality, and Integrity of Degrees

ICP reports that it will “use current program review and assessment practices to monitor and improve, when necessary, current programs.” As noted elsewhere in this report, program review practices and processes are in a nascent state, and ICP will have to navigate several challenges laid out in the team’s recommendations in order to meet accreditation standards. The team calls attention to these specific recommendations:

- *Track, analyze and make visible measures of student achievement including retention and graduation rates (CFR 1.2)*
- *Support professional development of the faculty capacity for effective assessment of student learning (CFR 2.4, 2.6, 2.7, 2.9)*
- *Develop a curriculum map and assessment plan for the core psychoanalytic competencies and begin implementation of the assessment plan (CFR 2.3, 2.4, 2.6, 2.7, 2.10, 4.3, 4.4)*
- *Create systems and structures to facilitate faculty development, integrate governance, coordinate assessment, and apprise faculty of institutional developments (CFR 3.10)*
- *Develop the IR capacity to collect, analyze and interpret data to support planning and decision-making and reporting (CFR 4.1, 4.2, 4.3)*
- *Operationalize the strategic plan with a multi-year enrollment plan, a realistic development plan and multi-year operating budgets (CFR 4.6)*

B. Educational Quality: Core Competencies, and Standards of Performance at Graduation

In its Institutional Report, ICP projects that its faculty “will continue to monitor refine, and improve standards of performance through the program review and assessment practices already in place.” The team again observes that these practices and processes are in a nascent state. ICP has recently undergone an external review by the Accreditation Council for Psychoanalytic Education (ACPE) and has begun to respond to ACPE’s recommendations, which demonstrates ICP’s commitment to maintain a high level of educational quality. The team reiterates the focus it places on the recommendations relevant to the “Meaning, Quality, and Integrity of Degrees.” Finally, the team emphasizes its judgment that ICP should provide substantial opportunities for faculty development so that faculty can participate in meaningful practices and processes of program review and assessment.

C. Sustainability: Preparing for the Changing Higher Education Environment

ICP’s Institutional Report promises that the institution “is in the process of establishing solid practices and procedures that will guide and prepare the institute to face any and all changes in higher education, as well as the economy, the state, political or any other that will affect the institute.” This statement encapsulates the team’s fundamental concerns about ICP’s eventual preparation for accreditation under the 2013 Handbook. The team worries that the model of participatory democracy currently instantiated at ICP, the institution’s business model, which lacks coherent planning for staffing, enrollment management, and financial management, and other aspects of ICP’s

structures and processes leave ICP without the organizational resources needed to prepare for and respond to the changing higher education environment. The team's most important recommendations seek to focus ICP's attention on the urgency of addressing these matters.

SECTION IV – INVENTORY OF EDUCATIONAL EFFECTIVENESS INDICATORS

The Inventory of Educational Effectiveness Indicators (IEEI) reflects the faculty's collective responsibility for setting SLOs and standards, assessing student learning, demonstrating achievement of standards, and the federal compliances checklist; these documents and the Guide for Determining Minimal or Substantial Compliance were reviewed by the team as evidence of educational effectiveness. These documents, together with the institutional report and findings of the onsite visit, contribute to the team's evaluation of the institution's level of compliance with the Standards of Accreditation and CFRs.

The team reviewed ICP's IEEI to understand how this institution articulates student-learning outcomes and how it assesses student achievement of learning outcomes, what the process is for interpreting results of student learning assessment, and how the findings are used. The team found the submitted IEEI reflected the nascent state of ICP's educational effectiveness efforts. The institution recently developed formal program learning outcomes (core psychoanalytic competencies) and has begun to incorporate these outcomes into courses, clinical training experiences, and student

evaluations. Direct data, apart from evaluations of individual students conducted by course instructors and clinical supervisors, about student achievement of the learning outcomes is not yet being collected, analyzed, or utilized for curricular and program change (CFR 2.4, 2.6). ICP was therefore not able to demonstrate that its graduates master the learning outcomes, nor was it able to demonstrate that student learning assessment data is being utilized to improve pedagogy and curriculum, or to inform decision making and policy development (CFR 2.4, 2.6, 4.1, 4.6).

SECTION V – FINDINGS, RECOMMENDATIONS, AND COMMENDATIONS

Commendations

The team found a vibrant teaching and learning community of psychoanalysts and analysts in training, linked by a culture that combines intellectual engagement, practice and psychoanalysis. The training is characterized as intense, the culture as relational and welcoming. The team also found that the Board of Directors and the faculty are open to change and recognize value in WSCUC accreditation and in the guidance offered by the WSCUC Standards.

Commendation 1--Institutional Culture: Passion and commitment to the mission of the Institute permeate the institutional culture.

Commendation 2--Vision: A high-quality faculty sustains the vision of the founders of ICP.

Commendation 3--Open Engagement: The institution has engaged in meaningful self-

reflection and is open to external review and feedback as part of seeking WSCUC accreditation.

Commendation 4--Learning Outcomes: *The Core Psychoanalytic Competencies are descriptive and well articulated as Program Learning Outcomes and are an important and promising first step to assessment of student learning.*

Commendation 5--Data Platform: Investment in a data platform demonstrates a commitment to improving operational effectiveness and developing institutional research capacity.

Recommendations

Throughout its report, the visiting team has made recommendations regarding each Criteria for Review for which, in the team's view, ICP does not yet substantially qualify for initial accreditation. The team wishes to focus ICP's attention especially on the following recommendations;

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

The team found that ICP meets this standard at a level sufficient for candidacy. **Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.** The team emphasizes the following recommendations:

Recommendation 1A: ICP needs to track, analyze, and make visible measures of student achievement, including retention and graduation rates (CFR 1.2).

Recommendation 1B: ICP needs to make visible the estimated cost of the

program, including tuition, personal analysis, and supervision (CFR 1.6).

Standard 2: Achieving Educational Objectives through Core Functions

The team found that ICP meets this standard at a level sufficient for candidacy. **Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.** The team emphasizes the following recommendations:

Recommendation 2A: ICP needs to support professional development of the faculty capacity for effective assessment of student learning (CFR 2.4, 2.6, 2.7, 2.9).

Recommendation 2B: ICP needs to develop a curriculum map and assessment plan for the core psychoanalytic competencies and begin implementation of the assessment plan (CFR 2.3, 2.4, 2.6, 2.7, 4.3, 4.4).

Standard 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

The team found that ICP does not meet this standard at a level sufficient for candidacy. **Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards.** The team emphasizes the following recommendations:

Recommendation 3A: ICP needs to establish a Board of Trustees with clear roles and appropriate oversight (CFR 3.9).

Recommendation 3B: ICP needs to clarify the decision-making roles and areas

of accountability of the Chief Executive Officer, the Chief Financial Officer, the Board of Directors, and the Board of Trustees (CFR 3.7).

Recommendation 3C: ICP needs to develop and implement a staffing plan that can strengthen operational effectiveness with particular focus on institutional research, enrollment management and financial management (CFR 3.1, 3.3, 3.4).

Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

The team found that ICP does not meet this standard at a level sufficient for candidacy.

Only the Commission is authorized to make the final determination as to whether or not an institution is in compliance with the Standards. The team emphasizes the following recommendations:

Recommendation 4A: ICP needs to develop the institutional research capacity to collect, analyze, and interpret data to support planning, decision-making, and reporting (CFR 4.1, 4.2, 4.3).

Recommendation 4B: ICP needs to operationalize the strategic plan with a multi-year enrollment plan, a realistic development plan, and multi-year operating budgets (CFR 4.6).

APPENDICES

Credit Hour and Program Length Review Form

CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? X YES
	Where is the policy located? lcpla.edu website
	Comments:
Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? YES via the Curriculum Committee's oversight
	Does the institution adhere to this procedure? Yes
	Comments:
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? Yes
	Comments:
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1-2 from each degree level.</i>	How many syllabi were reviewed? One
	What kind of courses Hybrid
	What degree level(s)? Doctoral
	What discipline(s)? Psychoanalysis
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? Yes
	Comments:

Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) <i>Please review at least 1-2 from each degree level.</i>	How many syllabi were reviewed? One
	What kinds of courses? Supervised Control Cases
	What degree level(s)? Doctoral
	What discipline(s)? Psychoanalysis
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? Yes
	Comments:
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? One
	What kinds of programs were reviewed? Psychoanalytic Training Program
	What degree level(s)? non-degree program
	What discipline(s)? Psychoanalysis
	Does this material show that the programs offered at the institution are of a generally acceptable length? Yes
	Comments:

ICP has clearly explicated a credit hour policy in line with WSCUC Guidelines.

ICP functions on a semester model. One-unit courses receive 15 hours of in-class instruction over a seven-week span and require 30 hours of work outside class. Two-unit classes receive 30 hours of in-class instruction over a period of fourteen weeks and require 60 hours of work outside the class. Students may take classes either in a weekday or weekend format. Weekday classes are offered one day per week for either seven or fourteen weeks. Weekend courses are offered during six weekends throughout an academic year. One-unit courses meet once per weekend, two-unit courses meet twice per weekend.

Didactic coursework (32 Units) is completed in four years of study. Additional requirements include a minimum of 300 hours of personal analysis, 950-1000 of supervised control case work, the completion of a comprehensive case report and the completion of a doctoral dissertation.

Review Completed By: Allen Bishop Date: 12/8/2017

Marketing and Recruitment Review Report

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices.

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	<p>Does the institution follow federal regulations on recruiting students? Yes</p> <p>Comments: ICP does not provide incentive compensation for the recruiting of students</p>
Degree completion and cost	<p>Does the institution provide information about the typical length of time to degree? Yes. Information is found in ICP brochures and the Candidate Progression Manual.</p> <p>Does the institution provide information about the overall cost of the degree? Yes</p> <p>Comments: Brochures state the application and annual tuition fee. Cost of analysis, a component of the application process, is explained to applicants during the interview process. Finance information in Catalog, pp. 10-11.</p>

Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? N.A.: All students are licensed mental health professionals and most are fully employed.
	Does the institution provide information about the employment of its graduates, as applicable? No, this is not applicable
	Comments: Information is provided on the website on the types of employment opportunities graduates might expect. However, information on the actual employment of its graduates is not provided. All ICP candidates are already licensed mental health clinicians who have their own practices or work in specific mental health programs. Candidates enter ICP to develop their clinical proficiency as psychoanalysts.

*§602.16(a)(1)(vii)

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

ICP follows federal guidelines related to marketing and recruitment of student candidates. Students are informed of the costs and length of the academic program. There is a question as to whether students are informed of the “true cost” of the educations, which includes the cost of personal analysis and the cost of control case supervision. A recommendation has been made to the Institute to insure these estimates are made available to applicants.

Future job opportunities are not discussed inasmuch as the candidate pool consists of currently practicing mental health clinicians.

Review Completed By: Allen Bishop Date: 12/8/2017

Student Complaint Review Report

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	<p>Does the institution have a policy or formal procedure for student complaints? Yes</p> <p>If so, is the policy or procedure easily accessible? Where? ICP website</p> <p>Comments: Ombudsman Office, Ethics Cde</p>
Process(es)/	<p>Does the institution have a procedure for addressing student complaints? Yes</p> <p>If so, please describe briefly: Students may contact the Ombudsman Office or the Ethics Committee to confidentially present any issues or concerns.</p>

procedure	
	If so, does the institution adhere to this procedure? Yes
	Comments: The Ombudsman Office has existed for a number of years to help facilitate concerns and complaints. Students may be helped directly by this office or connected to another appropriate committee for assistance.
Records	Does the institution maintain records of student complaints? Yes and No. If so, where? According to the Standards of Practice and Code of Ethics, the Ombudsman Office may not keep records due to confidentiality. The Ethics Committee maintains minutes and would maintain student complaints.
	Does the institution have an effective way of tracking and monitoring student complaints over time? Yes If so, please describe briefly: During the course of the academic year, if complaints have been handled by the Ombudsman Office, the chair reports to the Board of Directors the kinds of issues that may have arisen. The record of minutes by the Ethics Committee would be a way of tracking the complaints over time.
	Comments:

ICP has published an ICP Grievance Process to manage student, staff and faculty complaints, A gateway to this process is through the Office of the Ombudsman who attempts to facilitate resolution of the conflict by involving the principles in conversation and dialogue. If the matter needs further attention there are other routes to pursue. An ad hoc committee of the Candidate Progression Committee may be constituted to find a solution. If this process fails to yield a positive result the Chairs of the Candidate Progression Committee are empowered to make a decision. Another route for a grievance is the ICP Membership Committee. If no solution is available through these channels the aggrieved party may contact the President or Co-Presidents of the Institute to form a special committee (sometimes with legal input) to arrive at a solution. An additional attempt at resolution would be the constitution of a Grievance Committee chaired by a member of the Candidate Progression Committee. A referral to the Board of Directors who would be empowered to render a binding decision is made if the Grievance Committee is not successful.

Reviewing the Student Complaint Policy one is left with the impression that there needs to be a more formal and straightforward set of policies and procedures for all complaints. There are too many diverse and confusing avenues that students must choose from when filing a grievance. Simplicity and uniformity is needed in any new policy.

Review Completed By: Allen Bishop Date: 12/8/2017

Transfer Policy Review Report

Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices accordingly.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for receiving transfer credit? Yes
	Is the policy publically available? Yes
	Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? Yes
	Comments: ICP does not take on transfer students. However, a newly accepted candidate, through his/her advisor, may petition both the Candidate Progression Committee (CPC) and the Curriculum Committee to receive credit for coursework that is equivalent to that required or accepted at ICP

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*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that --

- (1) Are publicly disclosed in accordance with 668.43(a)(11); and
- (2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

See also WASC Senior College and University Commission's Transfer of Credit Policy. Review

Completed By: Allen Bishop

Date: 12/8/2017