



*Accreditation Review Commission on Education
for the Physician Assistant, Inc.*

March 28, 2025

3325 Paddocks Parkway, Suite 345
Suwanee, GA 30024
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Bashar W. Hanna, PhD
President
399 Ulmer Hall
Commonwealth University
401 N. Fairview St.
Lock Haven, PA 17745
basharhanna@commonwealthu.edu

Re: Notice of Adverse Action

Dear Dr. Hanna:

This letter will serve as formal notice that the Accreditation Review Commission on Education for the Physician Assistant, Inc. ("ARC-PA" or the "commission") has determined to place the **Commonwealth University Physician Assistant Program ("PA Program" or the "program")** on **Accreditation-Probation** status. The basis for the decision was the information contained in the program reports submitted to the ARC-PA, the report of the site visit team, the program's response to the site visit team's observations and the program's accreditation history.

As defined in the ARC-PA Policies, probation accreditation is a temporary accreditation status initially of not less than two years. However, that period may be extended by the ARC-PA for up to an additional two years if the ARC-PA finds that the program is making substantial progress toward meeting all applicable standards but requires additional time to come into full compliance. Probation accreditation status is granted, at the sole discretion of the ARC-PA, when a program holding an accreditation status of Accreditation - Provisional or Accreditation - Continued does not, in the judgment of the ARC-PA, meet the *Standards* or when the capability of the program to provide an acceptable educational experience for its students is threatened. Once placed on probation, a program that fails to comply with accreditation requirements in a timely manner, as specified by the ARC-PA, may be scheduled for a focused site visit and is subject to having its accreditation withdrawn.

The decision to place the program on probation was reached based on the evidence of noncompliance with the following standards: A1.02a, A1.02d, A1.03a, A1.03b, A1.07, A1.10a, A2.03, A3.11, A3.12d, B1.01d, B1.04b, B3.01, B3.07e, B3.07f, B4.01a, B4.01b, B4.04b, C1.01a, C1.01b, C1.01c, C1.01d, C1.01e, C1.01f, C1.02b, and C2.01b.

Collaborating Organizations: American Academy of Family Physicians • American Academy of Pediatrics • American Academy of Physician Associates • American Academy of Surgical Physician Assistants
• American Medical Association • Association of Physician Associates in Obstetrics and Gynecology • Physician Assistant Education Association

Member: Association of Specialized and Professional Accreditors (ASPA)

Recognized by: Council for Higher Education Accreditation (CHEA)

Additionally, during its review, the commission noted additional areas of noncompliance, A1.06. This area of noncompliance is explained in further detail in the enclosed Citations document.

The basis for the accreditation action is due to the failure of the PA Program to demonstrate the following at the time of the site visit:

- The sponsoring institutions responsibility for program assessment and compliance with the ARC-PA Standards and policies.
- The sponsoring institution's responsibility to provide the program with sufficient financial resources to operate the educational program and fulfill obligations to matriculating and enrolled students.
- The sponsoring institution's provision to the program with sufficient principal faculty and administrative staff to operate the educational program, comply with *Standards*, and fulfill obligations to matriculating and enrolled students.
- The sponsoring institution's support for the program in securing sufficient clinical sites and preceptors to allow students to meet the program learning outcomes for supervised clinical practice experiences.
- A clinical curriculum with sufficient breadth and depth to prepare the student for the clinical practice of medicine.
- Ensuring educational equivalency of course content when instruction is provided by different pedagogical and instructional methods or techniques for some students.
- Securing supervised clinical practice experiences and preceptors who enable students to meet program defined learning outcomes for pediatric and women's health to include prenatal and gynecologic care.
- The program's methods of assessment in the clinical courses align with what is expected and taught in the clinical curriculum.
- The program's methods of assessment for the supervised clinical practice experiences monitor and document the progress of each student in a manner that would promptly identify deficiencies in knowledge or skills in the specific program defined learning outcomes in a timely manner.
- Documented equivalency of student evaluation methods and outcomes when instruction was provided by different instructional methods or techniques for some students.
- A fully defined, ongoing self-assessment process that documented program effectiveness and fostered program improvement; that addressed administrative aspects of the program and institutional resources; effectiveness of the didactic and clinical curriculum; preparation of graduates to achieve program defined competencies; PANCE performance; and sufficiency and effectiveness of principal and instructional faculty and staff.
- Evidence of the consistent implementation of the program's ongoing self-assessment process through the performance of critical data analysis to address all aspects of the program.

GENERAL COMMENTS

The focused site visit and accompanying program reports and materials failed to provide evidence of compliance across multiple sections of the standards as noted by citations that involve administrative aspects (A Standards), curricular planning and assessment (B Standards), and the program's demonstration of an adequate self-assessment process (C *Standards*).

The accreditation probation status serves as a warning and provides an opportunity for the institution to address and correct its shortcomings in meeting accreditation standards. If the issues are not resolved, the program could potentially lose its accreditation status. The institution needs to take this probation period seriously and work diligently to meet the required standards.

During its review of the program, the ARC-PA noted twenty-six (26) areas of noncompliance with the *Standards*, as described in further detail in the enclosed Citations document. The Citations document includes information on reports due to the ARC-PA. If an appeal is not initiated, the program should respond to the citations as directed in the document. If an appeal is initiated, the program will receive a revised or affirmed Citations document at the end of the appeal process with information regarding reports due to the ARC-PA.

A focused probation site visit will need to occur in advance of the **March 2027** commission meeting. This visit will evaluate the PA Program and institutional progress in addressing specific citations identified during the course of the most recent commission review of the PA Program. The ARC-PA retains the right to meet with faculty and students or pursue other issues that may surface during the course of the visit related to the *Standards*. The enclosed Citations document contains details about requirements for the focused visit as well as required reports. Additional information will be conveyed to the PA Program in writing prior to the visit.

Please note that the program is approved to accept up to **72** students per class.

A program with the status of Accreditation-Probation is not eligible to request an increase in the maximum entering class size or expansion to a distant campus until it returns to an accreditation status of Accreditation-Continued. Further, it must maintain the status of Accreditation-Continued for five consecutive years before the ARC-PA will consider a request for an increase in maximum entering class size or expansion to a distant campus.

If the program wishes to appeal the ARC-PA's decision, it must send a written Notice of Appeal to me within ten (10) calendar days after the date of this letter. If a Notice of Appeal is not received, this decision is final and not subject to appeal. A copy of the relevant portion of ARC-PA's policy related to appeals procedures is attached for your information.

The appeals fee can be paid via check mailed to the ARC-PA at 3325 Paddocks Parkway, Suite 345, Suwanee GA or by ACH Direct Deposit to Renasant Bank, Routing # 084201294, Account # 8015270022.

If an appeal is initiated: the listing of the program on the ARC-PA website will continue to reflect the pre-adverse action accreditation status of the program, pending outcome of the appeal. The program should create its own appeal documentation as described in the attached Appeals Procedure document.

If an appeal is not initiated or if, upon appeal, the ARC-PA affirms its decision to place the program on Accreditation-Probation: the program must notify students and applicants of its probation status and update the accreditation status on its website, using the language provided below, within two business days. Additionally, a detailed description of the process used to notify students and applicants of the probation status must be emailed to accreditationservices@arc-pa.org within 14 calendar days. The program listing on the ARC-PA website will be revised to reflect the program's probationary status.

To communicate the program's accreditation status in all printed and electronic media, the program and institution must replace any previous wording with the following statement **exactly** as it is written:

At its **March 2025** meeting, the Accreditation Review Commission on Education for the Physician Assistant, Inc. (ARC-PA) placed the **Commonwealth University Physician**

Assistant Program sponsored by **Commonwealth University** on **Accreditation-Probation** status until its next review in **March 2027**.

Probation accreditation is a temporary accreditation status initially of not less than two years. However, that period may be extended by the ARC-PA for up to an additional two years if the ARC-PA finds that the program is making substantial progress toward meeting all applicable standards but requires additional time to come into full compliance. Probation accreditation status is granted, at the sole discretion of the ARC-PA, when a program holding an accreditation status of Accreditation - Provisional or Accreditation - Continued does not, in the judgment of the ARC-PA, meet the *Standards* or when the capability of the program to provide an acceptable educational experience for its students is threatened.

Once placed on probation, a program that fails to comply with accreditation requirements in a timely manner, as specified by the ARC-PA, may be scheduled for a focused site visit and is subject to having its accreditation withdrawn.

Specific questions regarding the Program and its plans should be directed to the Program Director and/or the appropriate institutional official(s).

The program's accreditation history can be viewed on the ARC-PA website at <https://www.arc-pa.org/accreditation-history-lock-haven-university/>.

As a reminder, programs are required to adhere to all ARC-PA *Standards* and requirements for maintenance of accreditation as outlined in Section 3 of the ARC-PA Accreditation Handbook (<https://www.arc-pa.org/entry-level-accreditation/accreditation-manual/>).

If you have questions or concerns, do not hesitate to contact us.

Sincerely,



Sharon Luke, EdD, PA-C
President and CEO

c: Latha Ramakrishnan, PhD; Dean; lramakrish@commonwealthu.edu
Jacquelyn Borst, DMSc, MSPAS, PA-C; Program Director; jrb1043@commonwealthu.edu
John Przypyszny, JD; Legal Counsel, ARC-PA



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10.8 Accreditation Actions Subject to Appeal and Appeal Procedures

The following adverse actions by the ARC-PA are subject to appeal pursuant to the ARC-PA's Appeal Procedures.

- refusal to consider a program for initial provisional accreditation
- assignment of probationary status
- withholding of accreditation
- withdrawal of accreditation

Any appeal must be based upon the time and the circumstances that triggered the ARC-PA adverse action (e.g., a reaccreditation commission review, provisional application, required report, etc.) and shall be based solely on the information contained in the documents upon which the decision was based. Descriptions of program changes made since that time will not be considered.

Programs receiving an adverse action are notified in writing of their right to appeal at the time of their accreditation status notification.

Appeal Procedure

Note: In extenuating circumstances, the chair of the ARC-PA may adjust these procedures to insure a fair and impartial review.

Appeals Fee

Reconsideration	Appeal before an Independent Appeals Panel
\$10,000*	\$40,000 * (In addition to other expenses as detailed In the Appeals Procedure)

*Accreditation Fees: <http://www.arc-pa.org/about/accreditation-fees/>

Accreditation Fees are to be mailed to:

Accreditation Review Commission on Education for the Physician Assistant
Attn. Accreditation Services
3325 Paddocks Parkway, Suite 345
Suwanee, GA 30024

Accreditation Status, Public Release

If the ARC-PA is requested or required to provide information to a third party regarding the accreditation status of a PA program that is pursuing the appeal process, the ARC-PA shall advise those inquiring that the program's accreditation status remains as it was prior to the appeal.

Collaborating Organizations:	American Academy of Family Physicians • American Academy of Pediatrics • American Academy of Physician Associates • American Academy of Surgical Physician Assistants • American Medical Association • Association of Physician Associates in Obstetrics and Gynecology • Physician Assistant Education Association
Member:	Association of Specialized and Professional Accreditors (ASPA)
Recognized by:	Council for Higher Education Accreditation (CHEA)

A. Notice of Appeal

If a PA program wishes to appeal the ARC-PA's adverse action, a written request for appeal must be received from the program by ARC-PA within ten (10) calendar days from the date of the written letter containing notice of the accreditation decision. The written Notice of Appeal along with payment of the Reconsideration Fee, which must include all documentation in support of the appeal, must be received by the ARC-PA Executive Director within twenty (20) calendar days from the date of the written request for appeal.

At a minimum, the Notice of Appeal is to include:

- A statement of the accreditation decision to be reviewed;
- A description of the modification or reversal sought by the program;
- A complete and concise description of any inaccurate, incomplete or erroneous fact(s), or incorrect interpretation of the **Standards**, on which the Program believes the decision was based;
- Pertinent detailed supporting documentation, and
- Any other relevant information the program wishes to have reviewed.

The Notice of Appeal must be no more than two hundred (200) pages total, using standard twelve (12) point font (Times New Roman or Calibri) and one (1) inch margins.

The program is to submit its written request for appeal and Notice of Appeal **electronically as an attachment to** accreditationservices@arc-pa.org.

If a written request for appeal is not received by the ARC-PA within ten (10) calendar days from the date of the letter notifying the institution and program of the adverse action, the initial adverse action by the ARC-PA shall constitute final action by the ARC-PA, effective immediately.

B. Reconsideration Panel

All Notices of Appeal are initially referred to a Reconsideration Panel consisting of three members to include two PA educators with ARC-PA experience and/or past commissioners. The panel will also include a public member*. The ARC-PA will develop a pool of 15-20 panelists per year for a term of two years with the potential to renew upon approval by the Executive Committee. Conflict of interest considerations would apply so panelists may not have any connection to the program being considered. A member of the Reconsideration Panel cannot have a conflict of interest with the program being considered, e.g., served as a consultant to the program.

No person shall be included on the Reconsideration Panel if they:

- participated in the site visit that triggered the adverse action;
- was assigned to review recent site visit findings, required reports or other ARC-PA findings regarding that PA program on behalf of the ARC-PA; or
- has a conflict of interest as determined under the ARC-PA Conflict of Interest Guidelines.

The Reconsideration Panel will be provided with the following materials, which shall constitute the Review Record:

- a complete file of all documents concerning the program that were available to the ARC-PA and upon which the ARC-PA relied in making the decision that is the subject of the appeal;

- a copy of the Letter of Accreditation notifying the institution/program of the adverse action; and
- the Notice of Appeal.

The Reconsideration Panel members will consider the materials independently before discussing the program during an in-person meeting or via telecommunication. The Reconsideration Panel members may consult with ARC- PA staff regarding ARC-PA policy issues during the course of its review.

C. Deliberation of the Reconsideration Panel

In developing its decision, the Reconsideration Panel will give consideration to the Notice of Appeal, the particular facts or **Standards** at issue, as well as the existing ARC-PA policies. The Reconsideration Panel shall determine whether the ARC-PA's action is supported by the evidence, and whether the action was taken in accordance with the ARC-PA's policies and procedures.

D. Reconsideration Decision and Report

The Reconsideration Panel shall make one of the following decisions:

- Affirm the initial adverse action; or
- Modify or reverse the initial adverse action.

The Reconsideration Panel shall forward a written report of its decision, and the reasons therefore, to the ARC-PA Executive Director. The program will be notified of the Reconsideration Panel decision by the ARC-PA Executive Director.

If the adverse action being reconsidered is related to probation or refusal to consider a program for accreditation, the decision of the Reconsideration Panel is final and the appeal process is complete. The program may not request a Formal Appeal hearing by the ARC-PA.

If the program remains dissatisfied with a decision relating to withdrawal of accreditation or withholding of accreditation, it may request a Formal Appeal hearing before the ARC-PA. The ARC-PA must receive a request for a Formal Appeal Hearing, in writing, within **ten (10) calendar days** from the date of the letter notifying the institution and program of the Review Panel decision.

The [Appeal Process Graphic](#) is also available to provide programs a summary and easy reference of the ARC-PA's appeal procedures.