

**APPROVED**

**SEPTEMBER 14, 2021**

Item #E-1  
September 14, 2021

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY  
FOR INDEPENDENT INSTITUTIONS**

**Submitted for:** Action.

**Summary:** New independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions are also required to obtain authorization for each new degree program.

**Action Requested:** That the Illinois Board of Higher Education approves the recommendations to grant degree-granting authority and/or operating authority to the following institutions:

**Private Not-For-Profit**

The Chicago School of Professional Psychology

- Doctor of Philosophy in Behavior Analysis in the Chicago Region



STATE OF ILLINOIS  
BOARD OF HIGHER EDUCATION

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY  
FOR INDEPENDENT INSTITUTIONS**

The Illinois Board of Higher Education (IBHE) has responsibility for administration of The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010). Under these statutes, new independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions also are required to obtain authorization for each new degree program.

Applications for new operating and degree-granting authority submitted by independent Illinois institutions and out-of-state institutions are reviewed by the staff. Recommendations are developed by applying criteria for operating and/or degree-granting authority, which are defined in the rules adopted for administration of the statutes and Board policies on assessment of student learning and specialized accreditation requirements for student licensure. These criteria encompass educational objectives, institution and degree titles, curricula, facilities, faculty and administrator qualifications, student policies, publications, records, compliance with pertinent laws, and fiscal stability. Staff recommendations are based on analyses of application materials, responses to questions, and site visits. Out-of-region sites are defined as sites located within an IBHE approval region other than the region within which an institution's original operating authority was granted. There are ten IBHE approval regions; each is coterminous with one or more community college districts. Approval to operate within a new approval region entitles an institution to operate throughout the region, and not solely at the site at which the institution initially applied.

This item includes recommendations to grant degree-granting authority to one institution.

**Private Not-For-Profit Executive Summary**

The Chicago School of Professional Psychology

- Doctor of Philosophy in Behavior Analysis in the Chicago Region

The Chicago School of Professional Psychology (TCSP or University) requests authorization to grant the Doctor of Philosophy in Behavior Analysis in the Chicago Region. The proposed 61-credit-hour full-time hybrid program is designed for students who currently possess master's level Board Certified Behavior Analysts (BCBA) certification and who wish to advance their career to become a Board Certified Behavior Analyst – Doctoral practitioner/supervisor or pursue academic positions with an emphasis on behavior analytic research. The proposed program provides qualified students opportunity to pursue a concentration in Organizational Behavior Management with or without the Verified Course Sequence of Culturo-Behavior Science credential or a Generalist concentration, preparing students to serve as lead practitioners and researchers in educational, clinical, and business settings; respond to the diverse needs of consumers of behavioral interventions and therapies; and teach and mentor students of behavior analysis in university settings. There are

policies in place to ensure faculty members possess the training, credentials, and qualifications to provide instruction in the proposed program. The University has sufficient library, technology, staff, and financial resources in place to support the proposed program.

The staff recommends adoption of the following resolutions:

*The Illinois Board of Higher Education hereby grants to The Chicago School of Professional Psychology the authorization to grant a Doctor of Philosophy in Behavior Analysis in the Chicago Region, subject to the institution's implementation and maintenance of the conditions that were presented in its application and that form the basis upon which this authorization is granted.*

**The Chicago School of Professional Psychology**  
**325 North Wells Street**  
**Chicago, IL 60654**  
**President: Michele Nealon, PsyD**

**Proposed Program Title in the Region of Authorization:** Doctor of Philosophy in Behavior Analysis in the Chicago Region.

*Projected Enrollments and Degrees*

First Year Enrollment	Fifth Year Enrollment	Degrees Awarded Fifth Year
13	47	4

**Institutional Accreditation:** The Chicago School of Professional Psychology is accredited by the Western Association of Schools and Colleges Senior College and University Commission.

**Background and History**

The Chicago School of Professional Psychology (TCSPP or School) was founded in 1979 as a not-for-profit institution in Chicago to provide professional training to psychologists and other mental health practitioners in a nonprofit setting. The institution moved to its current location in Chicago in 2004, and in 2006, began offering online programs. In 2007, the School’s Board of Trustees approved expanding the institution’s presence to California, Texas, and the East Coast. Today, The Chicago School of Professional Psychology offers 20 graduate psychology programs at the Chicago campus and more than 35 online programs nationally.

The School is seeking authorization to offer a Doctor of Philosophy (PhD) in Behavior Analysis in the Chicago Region. The proposed 61-credit-hour full-time doctoral program is designed for students who currently possess master’s level Board Certified Behavior Analysts (BCBA) certification and who wish to advance their career to become a Board Certified Behavior Analyst – Doctoral (BCBA-D) practitioner/supervisor or pursue academic positions with an emphasis on behavior analytic research. The proposed program prepares students to serve as lead practitioners and researchers in educational, clinical, and business settings; respond to the diverse needs of consumers of behavioral interventions and therapies; and teach and mentor students of behavior analysis in university settings.

**Institutional Data**

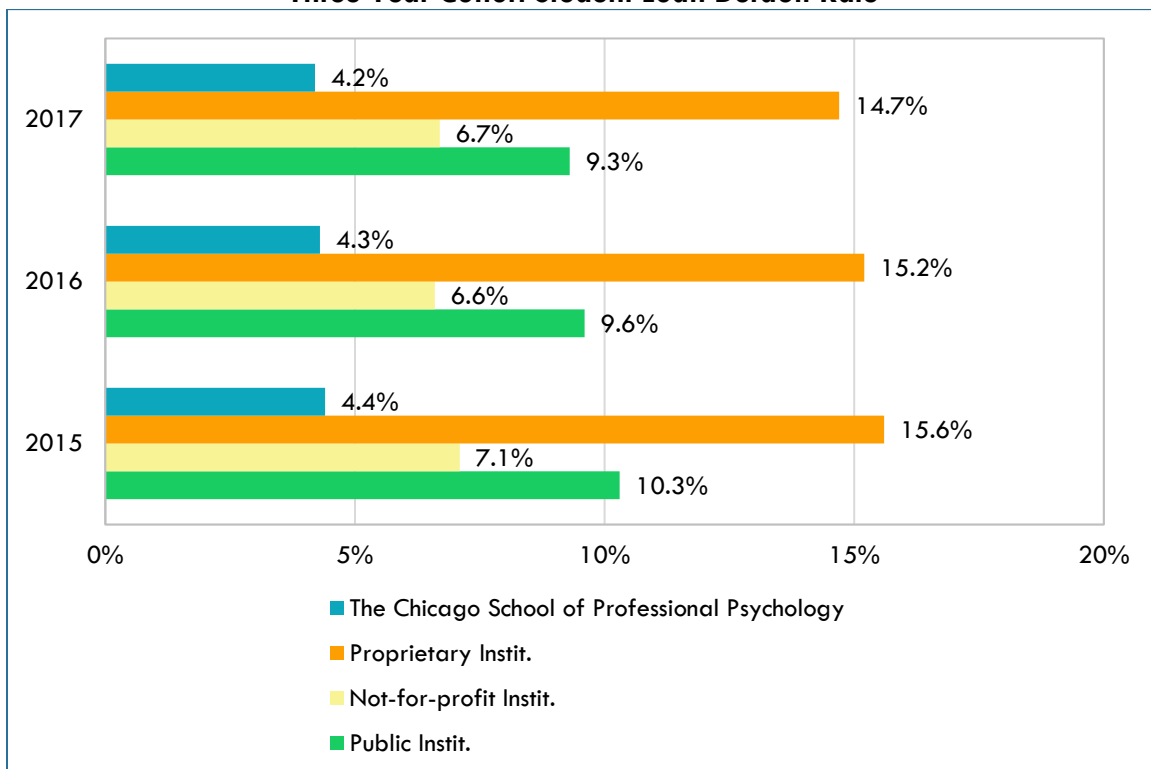
*1030.30(a)(3)(F): Success in student progression and graduation across all existing approved programs, and success rates in programs preparing students for certification and licensure, shall be consistent with expectations in higher education and the appropriate related field of study. At a minimum, the Board shall consider the following factors, based on results for similar institutions: (i) Graduation rates, certificate and degree completion rates, retention rates, and pass rates for licensure and certification aligned with thresholds set by State or national regulatory bodies; and (ii) Success rate, which shall be, at a minimum, higher than that of the lowest quartile of these measures for similar Illinois institutions defined as open versus competitive enrollment institutions and primarily associate versus primarily baccalaureate granting institutions. Exceptions may be made to the lowest quartile if an institution is above the national average for these measures using the same comparison categories of institutions.*



This section includes information about institutional and student success measures for each institution seeking program approval. The institution’s rates will be compared to Illinois institutions from within a select comparison group and against the national standards or averages. For a proposed undergraduate program, this section will include undergraduate graduation rates, first-to-second year retention rates, student loan default rates, and any applicable licensure passage rates. For a proposed graduate program, this section will primarily focus on student loan default data since this measure also includes graduate students in the calculation.

Undergraduate-related data fields are not provided because the University proposes to offer a new graduate program.

### Three Year Cohort Student Loan Default Rate



Source: National Center for Education Statistics (NCES), US Department of Education

Note: The national cohort default rate for fiscal year 2017 is 9.7 percent.

A lower number is a positive indicator.

The three-year cohort student loan default rate is the percentage of a school’s borrowers who enter repayment on certain Federal Family Education Loan Program or William D. Ford Federal Direct Loan Program loans during a particular federal fiscal year, October 1 to September 30, and default or meet other specified conditions prior to the end of the second following fiscal year.

### A Thriving Illinois: Higher Education Paths to Equity, Sustainability, and Growth

IBHE is charged to develop a strategic plan to address the present and future aims and needs and requirements of higher education in Illinois (110 ILCS 205/6) (from Ch. 144, par. 186) Sec. 6).

The proposed program supports Goal 1, Equity of A Thriving Illinois to close the equity gaps for students who have historically been left behind. The Chicago School of Professional Psychology is committed in its stated values to diversity, cultural proficiency, and "pluralism...[to] advance self-reflection, inclusion, and social justice..." and beyond currently traditional social categories of race, ethnicity, gender, and socio-economic status. The School's student body racial and ethnic makeup is about 50 percent non-White and nearly 80 percent female, demonstrating the institution's commitment to ensuring equity and access to advanced degree programs for students who have historically been left behind. Further, TCSPP's model of education (the Engaged Professional) includes requirements for students and faculty to embed themselves in and provide culturally relevant supports to communities who have been overlooked, neglected, and/or otherwise underserved socially and psychologically.

The proposed program also supports Goal 2, Sustainability, to build a stronger financial future for individuals and institutions; and Goal 3, Growth, to increase talent and innovation to drive economic growth. The program expands well-qualified students' access to advanced degrees and increased employment opportunities. Specifically, the U.S. Bureau of Labor Statistics projects a 24.7 percent increase in substance abuse/behavioral disorders/mental health counselor positions; an 8.8 percent increase in the number of positions requiring a doctoral degree to teach in psychology programs, which includes Behavior Analysis; and a 20.5 percent increase in the number of Health Specialties teaching positions requiring a doctorate for the 2019-2029 decade. Similarly, the Illinois Department of Employment Security projects a 13.94 percent increase in the number of Substance Abuse/Behavior Disorder/Mental Health Counselors; a 2.23 percent increase in college-level Psychology Instructors and 11.57 percent increase in college-level instructors of Health Specialties for the 2018-2028 decade. Also, the U.S. Department of Labor Statistics "Education Pays: Earnings and Unemployment Rates by Educational Attainment 2020" shows those with a doctorate have the highest weekly median income (\$1,885 per week) and the lowest rate of unemployment (2.5 percent), compared with those who achieve a bachelor's degree (\$1,305 per week median income and 5.5 percent unemployment).

### **Mission and Objectives**

*1030.60(a)(2): The objectives of the certificate or degree program must be consistent with what the degree program title implies.*

*1030.60(a)(3): The requested certificate or degree program shall be congruent with the purpose, goals, objectives and mission of the institution.*

The proposed program is consistent with the purpose, goals, objectives, and mission of the institution. The requested degree title is in alignment with the corresponding degree program objectives and curriculum.

### **Curriculum/Assessment**

*1030.60(a)(4): The caliber and content of the curriculum shall assure that the stated certificate or degree objectives for which the program is offered will be achieved.*

## Admission

Admission to the proposed PhD in Behavior Analysis requires prospective students to meet the following criteria:

- Master's degree and hold a current Behavior Analyst Certification Board (BCBA) certification in good standing, or be eligible to sit for the BCBA credentialing examination
- Successful work history
- Admission essay(s)
- Letters of recommendation from professors or professional or volunteer experience supervisors
- Minimum undergraduate or graduate cumulative GPA of 3.0 on a 4.0 scale

## Curriculum

The PhD in Behavioral Analysis requires 61 credit hours and is designed to prepare students for a career in the growing field of Behavior Analysis. Students must complete core courses and select a concentration in either the generalist or organizational behavior areas and complete a dissertation.

### Core Courses – 37 semester credit hours

- Advanced Professional Development
- Advanced Behavior Analysis
- Foundations of Behavioral Acquisition
- Translational Research
- Advanced Behavioral Research
- Statistical Analysis
- Critical Analysis of Research in Verbal Behavior
- Experimental Analysis of Behavior
- History and Philosophy of Behaviorism
- Essentials of Instructional Design
- Ethics, Diversity, and Multiculturalism in Behavior Analysis
- Dissertation Development I-VI

### Generalist Concentration – 9 semester credit hours

- Clinical Supervision
- College Teaching
- Research Methods in Psychology and Education

### Organizational Behavior Management Concentration – 18 semester credit hours

- Organizational Behavior Management
- Behavioral Economics
- Behavioral Systems Analysis\*
- Research Methods in Organizational Behavior Management
- Performance Management
- Consultation

Elective Coursework – up to 15 semester credit hours, depending on concentration

Students in the Organizational Behavior Management concentration who choose to pursue the Culturo-Behavior Sciences credential must complete two semesters of internship, which totals 300 hours of fieldwork focusing on organization subcultures and cultural discrepancies. All students must design, conduct, synthesize, and evaluate original behavior-analytic research that results in a dissertation meeting the requirements aligned with the Board Certified Behavior Analyst – Doctoral (BCBA-D) credential.

#### Assessment of Student Learning

The Chicago School of Professional Psychology has established formal policies and procedures for measuring student progress and achievement through formative and summative assessments of student learning outcomes. Program faculty are responsible for systematically evaluating the achievement of student learning goals in the following ways:

- Formative evaluations
  - o Course-based work samples, including common course assignments and end-of-year capstone exams
- Summative assessment
  - o Competency exam
  - o Formal dissertation defense

Based on formative and summative outcome measurements, the department revises the student learning assessment plan, the curriculum, approaches to learning and the content applicability to developments in the field of behavior analysis.

#### Program Assessment

The University has established formal policies and procedures using qualitative and quantitative measures for reviewing courses and programs annually, with comprehensive program reviews occurring for brand new programs within three years of program implementation and every five years thereafter. At the University level, the Director of Educational Effectiveness, under the oversight of the Institutional Effectiveness Review Committee, serves as the facilitator and resource for academic program reviews, ensuring the program review process is congruent with regulatory and accreditation expectations and compliance requirements. Data to aid program evaluation includes formative and summative measures for each program competency based on the following information:

- Common assignments across course sections, assessment centers, and seminar leader evaluations
- End of first year capstone examinations
- Dissertation quality and/or publication
- Comprehensive examinations
- Program metric data, including enrollment, student demographics, average class size, entering GPA, average GPA of graduates, credit hours, retention rates, job placement rates, and student satisfaction surveys
- Graduation, completion, and finance data



## **Facilities (space, equipment, instructional materials)**

*1030.60(a)(5): The institution shall have adequate and suitable space, equipment and instructional materials to support institutional programs.*

The University has adequate and suitable space, equipment, and instructional materials to support the proposed program. TCSPP's Library (Library) has a physical presence at the Chicago campus and provides electronic access to more than 250 databases, 300,000 eBooks, 140,000 eJournal titles, and 1.7 million full-text citations. The Library possesses the physical resources and digital content sufficient to support the proposed program.

## **Faculty and Staff**

*1030.60(a)(6): The education, experience and other qualifications of directors, administrators, supervisors and instructors shall ensure that the students will receive education consistent with the objectives of the program.*

The Chicago School of Professional Psychology has established policies to ensure that faculty members possess the training, credentials, and other required qualifications to provide instruction to students. The University also has established policies to evaluate faculty and provide feedback on student learning outcomes.

## **Fiscal and Personnel Resources**

*1030.60(a)(8): Fiscal and personnel resources shall be sufficient to permit the institution to meet obligations to continuing programs while assuming additional resource responsibilities for the new certificate or degree program.*

The University has submitted five-year fiscal plans that project a deficit for the first year of program operation. The University projects that revenues will exceed expenditures beginning in the second year.

## **Accreditation/Licensure**

The proposed curriculum of the PhD in Behavior Analysis aligns with the requirements set forth by the Association for Behavior Analysts International (ABAI), a programmatic accreditor. TCSPP intends to seek program accreditation from ABAI once the program has graduated its first student(s). The curriculum of the PhD in Behavior Analysis is also aligned with the requirements for the Behavior Analyst Certification Board (BACB) for students to qualify for the Board Certified Behavior Analyst – Doctoral (BCBA-D) designation.

## **Program Information**

*1030.60(a)(7): The information the institution provides for students and the public shall accurately describe the programs offered, program objectives, length of program, schedule of tuition, fees, and all other charges and expenses necessary for completion of the course of study, cancellation and refund policies, and such other material facts concerning the institution and the program or course of instruction as are likely to affect the decision of the student to enroll. This information, including any enrollment agreements or similar agreements, shall be available to prospective students prior to enrollment.*

The Chicago School of Professional Psychology submitted detailed and adequate information on the University's academic policies, tuition, fees, refund policies, admissions procedures, and other relevant information necessary for prospective students to make informed decisions on enrollment.

### **Staff Conclusion**

The staff concludes that The Chicago School of Professional Psychology and its proposed program meet the criteria in Sections 1030.30 and 1030.60 of the rules to implement The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010), and the relating Illinois Administrative Code (Title 23 Section 1030) pertaining to the assessment and licensure of a post-secondary institution.