



International Coach Federation

Program

Accreditation Code
of Conduct

ICF Program Accreditation

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Purpose

The purpose of this document is to articulate the policies and procedures that govern International Coach Federation (ICF) accredited programs to ensure ICF affiliated educational offerings convey consistency and utmost quality within the industry.

Scope

Organizations seeking initial ICF accreditation or renewal of ICF are responsible to clearly demonstrate compliance with all applicable ICF policies and criteria prior to, during and after official accreditation. This policy document establishes binding guidelines to ensure appropriate conduct of all ICF accredited programs before and after a particular offering has been granted accreditation.

Good Faith

ICF requires each organization seeking program accreditation, or currently holding an accredited program, to engage in the process in good faith. Programs must provide accurate and truthful information prior to and throughout the accreditation process. Any program that fails to participate in good faith by falsifying information presented in the accreditation process or at any time prior may be subject to punitive measures at ICF's discretion.

For the purpose of this requirement, falsification is defined as the fabrication, in whole or in part, and through commission or omission, of any information provided by an organization to ICF. This includes but is not limited to providing false or misleading data related to accreditation status; providing false or misleading program information; providing false or misleading outcomes data; providing false or misleading information in an effort to receive a postponement or an extension on an accreditation action; forging signatures of authorization; or engaging in any false or misleading advertising with respect to the accreditation status.

However, the program may submit additional material that summarizes or otherwise explains the original information provided to ICF. These additional materials must be correctly identified, dated and accompanied by the original documents.

Program Complaint Process

By virtue of the ICF accreditation received, organizations are obligated to participate in the formal Program Complaint Process if levied. The *Program Complaint Process* is an objective mechanism in which students or members of public can hold ICF accredited programs accountable to the ICF Code of Conduct, for more information on this process, please click [here](#).

Definitions

Program

A course of study or combination of instructional material that may be broad in scope but follows a logical instructional sequence that promotes education relevant to 'coaching' as defined by ICF. The material has met the requirements of ICF, which is represented externally as an official accreditation (CCE, ACSTH, or ACTP).

Director of Training (DOT)

The DOT will have full oversight of the ICF accredited program. This will include the supervision and implementation of the program and its ability to maintain alignment with the ICF Code of Conduct. This individual will also be held accountable for the consistent alignment with all other ICF policies and procedures, including oversight of the curriculum, instructional processes, and training of instructors.

Accredited Coach Training Program (ACTP)

A start-to-finish coach-training program, the ACTP includes comprehensive instruction around the ICF Core Competencies, Code of Ethics and ICF definition of coaching. The ACTP also includes Mentor Coaching, observed coaching sessions and a comprehensive final exam that evaluates a student's coaching competency at PCC Credential level. Graduates of an ACTP may apply for an individual ICF Credential using the ACC or PCC, ACTP application pathway.

Approved Coach Specific Training Hours (ACSTH)

ACSTH programs are accredited on an hour-by-hour basis and may or may not be a full coach-training program depending on the number of student contact hours. The ACSTH program includes instruction around the ICF Core Competencies, Code of Ethics and ICF Definition of Coaching and students completing all hours from an ACSTH may apply for an individual ICF Credential via the ACSTH path.

Continuing Coach Education (CCE)

CCE programs are designed for individuals who possess foundational coach knowledge (i.e. ICF Credential) and are seeking professional development to refine or expand their skillset. These courses also provide 'continuing education units' (CCEUs) which are necessary for ICF-Credential holders to renew their credential.

Core Competency (CC)

Refers to content pertaining to the [ICF Core Competencies](#)

Resource Development (RD)

Constitutes training offered (content) outside the ICF Core Competencies, which contributes to the professional development of a coach. Examples of RD content include training around business development, assessment tools, personal development, and presentation of research or reference materials.

Synchronous Learning (SL)

Refers to a learning environment in which the cohort participates in a live voice-to-voice or face-to-face classroom setting. 'Lecture' is an example of synchronous learning in a face-to-face environment, where learners and teachers are all in the same place at the same time (i.e., live interaction through any means, including lecture, telephone conference, and webinar).

Asynchronous Learning (AL)

Is a self-paced teaching method that uses online learning resources to facilitate information sharing outside the constraints of time and place among a network of people (i.e. recorded content, reading books, and homework).

Blended Learning

Is a formal education program in which a student learns at least in part through online delivery of content and instruction with some element of student control over time, place, path or pace.

Code of Conduct

1. Fraud

- 1.1. Misrepresentation by omission or commission found in any material submitted to ICF will result in immediate revocation of the program's application or accreditation status at the discretion of ICF.

2. Organization and Employee Conduct

- 2.1. It is incumbent on organizations to ensure that all coach trainers of accredited program are bound to the ICF Code of Ethics regardless of membership or credential. If an individual(s) breaches the Code, it is compulsory that the organization take action to remedy the situation. If negligence is found, ICF reserves the right to take corrective measures against the parties involved.
 - 2.1.1. If ICF staff discovers negligence on behalf of the organization or individual(s) involved in the ICF accredited program, ICF reserves the right to revoke the program's accreditation. ICF reserves the right to take remedial punitive actions against the parties involved at their discretion and outcomes will be decided on a case-by-case basis.
- 2.2. Organization's that have an ICF accredited program (educational offering) are obligated by virtue of the ICF accreditation received, to be in full compliance with the ICF Code of Conduct. This, in turn, subjects the organization to participate in the formal Program Complaint Process, if levied. The Program Complaint Process is an objective mechanism in which students or members of public can hold ICF accredited programs accountable to the ICF Code of Conduct, for more information on this process, please click [here](#).

3. External reference to ICF

- 3.1. The standalone 'ICF' acronym may be utilized when stating a specific program's accreditation, an individual's affiliation with ICF, or when describing ICF as an entity; all of which must be crafted in a way that clearly conveys ICF's role in the industry in a factual manner. This applies to all marketing material in which an affiliation is stated or implied, including Google ad words.
 - 3.1.1. *Acceptable*: "We offer an accredited ICF training program which will meet the educational requirements for an ICF Credential."
 - 3.1.2. *Unacceptable*: "We offer ICF Certification Courses."
- 3.2. Organization's or the educational offerings within them are not permitted to use ICF trademarks or any language that conveys a direct or implied affiliation with ICF in a program name, course title, organization name, etc...This practice contributes to market confusion and has the potential to mislead the public who are not privy to the nuances of the ICF accreditation system, therefore, it is prohibited. ICF staff has the latitude to determine what conveys 'implied affiliation.'
 - 3.2.1. Usage of any ICF designation and/or acronym is indefinitely prohibited: ICF, ACC, PCC, MCC, CCE, ACSTH, ACTP (e.g. Associate Certified Coach Training Program, PCC Coach Training, ICF Coach Training).
- 3.3. ICF's intellectual property (IP) (e.g. ICF Core Competencies, ICF Code of Ethics, etc.) is required to be adequately cited in all material that is provided to the public (i.e. marketing, website, curriculum, course work, etc.).
- 3.4. ICF accredits specific educational offerings (i.e. a course's curriculum); it is incumbent on the organization to clearly convey that relationship to the public. Organizations themselves are never given an 'overall' accreditation by ICF. Implying such an affiliation is considered intentional misrepresentation and subsequently an *ICF Code of Ethics* violation.
- 3.5. Prior to accreditation, ICF defines the application process to start once the full application has been submitted to our Global offices. Making any claim contrary to this, will be considered intentional misrepresentation and subsequently an *ICF Code of Ethics* violation.

4. ICF Program Logo Usage

- 4.1. Logo guidelines established in the [ICF Brand Identity Manual](#) are applicable to all organizations; however, the following policy language is an addendum to that particular manual which incorporates program specific logo policies and guidelines.
- 4.2. Program logos (ACTP, ACSTH, CCE) may be utilized in a way that conveys an accredited program's direct affiliation to ICF.
 - 4.2.1. ICF accredits curriculum of specific courses, not organization's as a whole, this concept needs to be clearly conveyed in one's marketing language and logo usage.
 - 4.2.1.1. ACTP logo guidelines can be found [here](#).
 - 4.2.1.2. ACSTH logo guidelines can be found [here](#).
 - 4.2.1.3. CCE logo guidelines can be found [here](#).
- 4.3. If an organization is found to have deliberately misappropriated any ICF logo, ICF holds the right to revoke or suspend the program's accreditation.
 - 4.3.1.1. This includes prematurely displaying program logos before an accreditation has been awarded by ICF.
- 4.4. The standalone ICF Global Member logo is for individual global members use only; organizations may not utilize this logo to convey an overarching ICF affiliation.
 - 4.4.1. Individual staff members of an organization may utilize the ICF Global Membership logo (if in good standing as an ICF Global Member) on their respective personal/biography web page.

5. Distribution of Accredited Courses

- 5.1. ICF accredited courses may be offered in one or multiple physical locations throughout the international community by the organization and instructors specified in the formal application. If the accredited program has a 'partnership' with a third party (secondary organization, that is physically or virtually hosting the training), the following requirements must be met:
 - 5.1.1. The material provided, regardless of location, must remain identical to the originally accredited curriculum.
 - 5.1.2. The organization's "headquarters" must be the entity that distributes the program to affiliates and administers certificates of completion to the cohorts.
 - 5.1.3. A DOT must be in place to oversee the distribution schema and is tasked with accurately assessing the integrity of material presented for all third parties regardless of language. This measure is in place to ensure no possible degradation of material or misalignment with the ICF Core Competencies.
 - 5.1.3.1. The DOT is required to sustain the integrity of all material and will be held accountable for any degradation or misalignment. It is incumbent on this individual who serves as ICF's primary contact to be aware of all program affiliations and their respective compliance.
 - 5.1.4. It is incumbent on the DOT to alert ICF of any partnership with secondary organizations for record keeping purposes.
 - 5.1.5. The program that is being delivered at the secondary organization must have the same staff (instructors, observers, mentors, examiners, etc...) that were submitted with the original application. No other instructors, observers, mentors or examiners can be used to deliver this program.
 - 5.1.5.1. If additional personnel are added to the accredited program faculty, the DOT must notify ICF of these changes to ensure the individual(s) hold the required credentials.
- 5.2. If the above requirements are met, it is incumbent that both organizations explicitly state the partnership between the two parties, in a transparent manner. The relationship must be clearly conveyed in any material that alludes to an ICF affiliation.

- 5.2.1.1. An ideal example: “(Program ABC) is being offered by the (original organization ABC) in partnership with (secondary organization ABC)”
 - 5.2.2. Secondary organizations are prohibited from utilizing ICF program logos in any capacity, regardless of partnership.
 - 5.2.3. If ICF determines the above policy is not being adhered to the fullest, the organization and DOT that holds the ICF accreditation will be held responsible. Therefore, ICF staff will have the latitude to suspend or revoke a program's accreditation.
 - 5.2.4. Any partnership or affiliation is absolutely prohibited, unless the above requirements have been met.
- 5.3. Organizations may offer a portion of their originally accredited program as separate educational offerings. However, the content must remain identical to the verified curriculum (e.g. an organization can offer the last module of their ACTP or ACSTH as a CCE offering to the public as an ICF accredited CCE course).

6. Operational Standards-(ACTP/ACSTH Only)

The following operational standard must be met by all programs. Should any of the below standards not be met by the training organization, or if ICF determines that there is not sufficient support to determine compliance with any of these criteria, the application will be denied, and the contact person listed in the application will be notified.

- 6.1. All programs are required to have a publicly accessible website that includes a comprehensive explanation of what the training program offers. The website must include:
 - 6.1.1. Title of the program
 - 6.1.2. General program vision and goals
 - 6.1.3. List of classes/modules/parts
 - 6.1.4. Number of student contact hours included in program
 - 6.1.5. Learning goals
 - 6.1.6. Coaching philosophy/model/approach
 - 6.1.7. Listing of lead instructors
 - 6.1.8. Dates and locations of when and where the program is to be delivered
 - 6.1.9. Language(s) that are used in program delivery
 - 6.1.10. How the program is delivered (e.g. face-to-face, webinar, telephonic, combination)
 - 6.1.11. Intended participants
 - 6.1.12. Requirements students must meet to enter the program
 - 6.1.13. Policies on payment of tuition and fees
 - 6.1.14. Policies on withdrawals and refunds

7. Content Standards-(ACTP/ACSTH Only)

- 7.1. The program's curriculum must address these areas:
 - 7.1.1. [ICF Code of Ethics](#)
 - 7.1.2. [ICF Core Competencies](#)
 - 7.1.3. [ICF Definition of Coaching](#)
 - 7.1.4. Eighty percent of the course must cover the ICF Code of Ethics, Core Competencies and Definition of Coaching. Twenty percent can include Resource Development (RD) material.
 - 7.1.5. Eighty percent of all lecture time must be synchronous, allowing the opportunity for real-time interaction between the teacher and the students.

7.2. The total number of hours should reflect the clock hours (sometimes referred to as "seat time/lecture time") required to deliver this content. Break/meal times cannot be counted.

7.2.1. This information is used by ICF to determine the total number of hours for accreditation, the balance between synchronous and asynchronous delivery, and the balance between coach-specific training and other content that is a part of your program but may not be considered as coach specific training. (i.e. Resource Development)

7.3. Should any of the following standards be found as "non-compliant" or if ICF determines that there is not sufficient support to determine compliance with any of these standards the accreditation will be denied or revoked and the contact person will be notified.

7.4. Observed Coaching Sessions (ACTP/ACSTH Only)

7.4.1. ICF considers observed coaching sessions with feedback provided to the student a vital component of quality coaching training. Practicing coaching and receiving feedback from qualified observers is a cornerstone for ICF affiliated programs.

7.4.2. Observed coaching sessions:

7.4.3. Are sessions in which a student is coaching any client, fellow student, or another person as a method for practicing their coaching skills

7.4.4. Do not have a minimum length, but should be long enough for a coaching conversation

7.4.5. Are observed by an instructor/observer who is responsible for providing written feedback to the student based on the use of the ICF Core Competencies in the coaching session

7.4.6. May be observed live or recorded

7.4.7. Count as a part of the total instructional hours of the program

7.4.8. ACSTH programs are required to provide a minimum of five (5) observed coaching sessions for each student. Written feedback must be provided for at least three (3) of the five sessions.

7.4.9. ACTP programs are required to provide a minimum of six (6) observed coaching sessions for each student. Written feedback must be provided for at least four (4) of the six sessions.

7.4.10. Confidentiality: Organization should only be submitting recordings in which they have received explicit permission from the client/student to provide recording/s of their coaching sessions to be reviewed by ICF staff and performance evaluation assessors for the purposes of assessing the quality and methods of the coaching.

7.5. Mentor Coaching Requirements (ACTP Only)

7.5.1. For purposes of ICF-credentialing: Providing professional services to develop the required coaching skills needed to obtain an ICF Credential. It consists of coaching and feedback in a collaborative, appreciative, and dialogued process based on (observed or recorded) coaching to increase the coach's capability and alignment with the ICF Core Competencies. Mentor Coaching for an ICF Credential focuses on developing coaching skills and not on the exploration of challenges of the coaching professional practice, such as building a business or achieving work/life balance.

7.5.2. The ICF requires that an ACTP provides a minimum of 10 hours of Mentor Coaching as a part of the accredited program.

7.5.3. These 10 hours of coaching should be integrated into the total program and occur periodically throughout the course of the training.

7.5.4. Mentor Coaching must be based on coaching sessions that the Mentor Coach has listened to live or via recordings.

7.5.5. The Mentor Coaching experience must extend over a period of at least three months.

7.5.6. Group mentoring may count for a maximum of seven hours toward the mentoring requirement. The group being mentored may not consist of more than 10 participants.

7.5.7. A minimum of three of the 10 mentoring hours must be one-on-one coaching with the mentor

7.6. Performance Evaluation (ACTP Only)

7.6.1. ACTP programs must administer a final performance evaluation in a formal testing environment. The final performance evaluation must, at a minimum, contain an actual observation of coaching at least one half-hour (30 minutes) in length which is graded as a final performance evaluation.

7.6.2. *Standards:* The performance evaluation must be graded at or above the ICF Credential PCC level, which is described in the minimum skill requirements for PCC. Students must receive written feedback/scoring for their performance evaluation that provides information regarding their performance on each of the ICF Core Competencies. Performance evaluation reviewers must hold an ICF Credential at the PCC or MCC level and competently understand the ICF Core Competencies and Code of Ethics.

7.6.3. *Procedure:* Performance Evaluation recordings will be sent to qualified ICF assessors to be evaluated. This process is to ensure that the recording was assessed at the PCC Credential level within the program. If the recording does not pass at the PCC Credential level, the organization will be able to resubmit new recordings for a fee of \$150 USD. This retake process can be completed a total of two (2) times. If the recordings still do not receive passing scores at that point, the training program will not be awarded the ACTP Accreditation, but instead, will be granted the ACSTH accreditation, provided that all other application requirements have been met.

7.6.4. *Confidentiality:* Organization should only be submitting recordings in which they have received explicit permission from the client/student to provide recording/s of their coaching sessions to be reviewed by ICF staff and performance evaluation assessors for the purposes of assessing the quality and methods of the coaching.

8. Faculty Standards-(ACTP/ACSTH Only)

8.1. Instructors

8.1.1. ICF requires that all instructors who are teaching the required ICF content (Definition of Coaching, Core Competencies, and Code of Ethics) hold one of the three ICF Credentials (ACC, PCC or MCC).

8.1.2. Those that are teaching other optional content not directly related to the (Definition of Coaching, Core Competencies, and Code of Ethics) are not required to hold an ICF Credential.

8.2. Observers

8.2.1. (ACSTH) ICF requires that all those serving as observers of student coaching sessions and providing written feedback hold one of the three ICF Credentials (ACC, PCC or MCC).

8.2.2. (ACTP) ICF requires that all those serving as observers of student coaching sessions and providing written feedback hold one either a PCC or MCC ICF Credential.

8.3. Mentors (ACTP only)

8.3.1. ICF requires that all Mentors for ACTP's hold an ICF PCC or MCC credential. Mentors must have a comprehensive understanding of the ICF Core Competencies and Code of Ethics.

8.4. Examiners (ACTP only)

8.4.1. The ICF requires that all examiners for ACTP's hold an ICF PCC or MCC credential. Examiners must have a comprehensive understanding of the ICF Core Competencies and Code of Ethics.

8.5. Director of Training- DOT (ACTP only)

8.5.1. The Director of Training provides oversight of curriculum, organizational compliance with ICF, instructional processes, training of instructors, and all observation and examination process. The DOT must meet the requirements set for in 8.5.2 or 8.5.3 (contingent on the country where the program is located).

8.5.1.1. This position does not have to be full-time, and the individual can be hired from outside the organization to fill this role.

8.5.2. Programs in the United States and Canada

8.5.2.1. ACTPs in the U.S. and Canada are required to have a DOT who holds the ICF MCC Credential.

8.5.3. Programs outside the United States and Canada

8.5.3.1. For ACTPs outside of the U.S. and Canada only, the Director of Training may either hold the MCC Credential or meet the alternative requirement, which is to subscribe to the ICF's definition of Coaching, Code of Ethics and Core Competencies, and to commit to attaining the MCC within three years.

8.6. Application requirements

8.6.1. The training organization will be required to submit a list of all their faculty members, noting each person's current ICF Credential level. The organization will also need to describe the processes in place to train instructors and observers, as well as the process to evaluate these faculty members. Please know that if faculty members listed on the application do not hold an ICF Credential there could be a delay in application review or the application could be denied.

9. Incremental Renewal Process (IRP) *(ACTP/ACSTH Only)*

December 1, 2013, ICF began the Incremental Renewal Process. The IRP will be a series of six surveys that will be administered bi-annually during the ACSTH/ACTP programs three-year accreditation cycle. Each survey will require various articles, depending on where the program is in the renewal process.

9.1. Surveys can request the following information:

9.1.1. General organization & program demographics

9.1.2. Sample Certificates of Completion

9.1.3. Curriculum information

9.1.4. Faculty information

9.1.5. Website information

9.1.6. List of students who have graduated for quality- survey purposes

9.1.7. Recordings of observed sessions or performance evaluation exams

9.1.7.1. Three recordings will be collected during the three-year cycle and organizations must submit recordings in which they have received explicit permission from the client/student to provide recording(s) of their coaching sessions to be reviewed by ICF staff and performance evaluation assessors for the purposes of quality assurance.

9.1.7.2. Document the evaluation process and grading criteria used for the final performance evaluation.

9.1.7.3. Submit the written feedback for the recording(s) and word for word transcripts.

9.2. Organizations will receive the aforementioned survey (through e-mail) that will need to be completed and submitted for review. Please review to your approval communication for the specific schedule.

9.2.1. After 60 days, if the survey response has not been received the program's accreditation will be placed on temporary suspension. In order for the accredited program to remain in good standing with ICF, the tardy survey as well the next renewal period survey must be completed. This will be communicated to the organization through e-mail. If the two surveys are not submitted 60 days after the secondary survey has been administered (8 months total from the original survey); the program will be officially suspended, and ICF accreditation will be terminated. At this point, the organization will need to re-apply through the formal application process.

9.3. In the unforeseen instance that one's IRP final review is delayed on ICF's behalf, the accreditation team will grant an interim accreditation to ACTP and ACSTH training providers. The provisional accreditation period will remain valid for the duration of the final survey review process and no longer.

9.3.1. This interim accreditation does not constitute an organization's official renewal; an official accreditation will be granted and conveyed once the comprehensive review has been completed. The interim accreditation will allow graduates of the ACTP and ACSTH program to apply for ICF Global Membership and ICF Credentialing without interruption.

10. CCE Program Content

10.1. CCE course offerings are considered supplemental and advanced education for those wishing to acquire new learning and/or those who are renewing their ICF Individual Credential. This content has to be in alignment with (Definition of Coaching, Core Competencies, and Code of Ethics) and refining the client coaching relationship.

10.1.1. A basic coaching curriculum that serves a cohort with no prior experience is to be filed under an ACSTH accreditation and will not be accepted for CCE hours. CCE courses are not typically utilized by individuals to apply for their first ICF Credential.

10.2. CCE programs can include a portion of RD content that complements the CC related curricula. Examples of RD content include training around business development, assessment tools, personal development, and presentation of research or reference materials.

10.2.1. If you deliver training that only qualifies as Resource Development CCE (training in personal development, coaching assessments or tools, business building, or other material that falls outside of the ICF Core Competencies), the program is not eligible for CCE accreditation.

11. CCE Program Operations

11.1. If ICF has not received the necessary course materials required to go forward with an accreditation six months after the posted event date, the application will be listed as withdrawn and refund issued. At this point, the organization will need to re-apply through the formal application process.

11.2. CCE program application fees are non-refundable and do not guarantee program accreditation.

11.3. CCE program accreditation is valid for one calendar year.

12. CCE Blended Learning Policy (CCE Only)

For asynchronous learning (AL) to be eligible for Core Competency CCEUs; the following conditions below must be adhered to:

Two-to-One Ratio of AL versus SL:

12.1. For every delivery of AL to count as CC CCE units, there needs to be at least an additional 50% of SL discussion following the module. (two-to-one ratio)

12.1.1. Example: A 10-hour AL module will require an additional five hours of synchronous discussion, for a total 15 CC hours class. This ensures concepts are understood; material can be reviewed, discussion of complex concepts can be facilitated, and sense of community is established.

12.1.2. Any discrepancies in this ratio will be counted as RD hours.

Demonstration of Learning:

12.2. An established system is in place and available for ICF staff to review prior to application submission.

12.2.1. An established system is one that is interactive, user-friendly and robust.

12.2.2. Website/system login (if applicable) must be provided to ICF staff.

12.3. Attendance and participation of AL must be verified either electronically or during SL time and in a manner that can be demonstrated to an ICF Program Coordinator.

- 12.4. *Demonstration of AL learning* must be well-documented and verifiable. ICF will require a robust verification of AL; proof of a verification model must be demonstrated within the CCE application.
- 12.4.1. Triad/Fishbowl- Participant will demonstrate technique presented in AL (practice with instructor present).
 - 12.4.2. Testing- Participant will complete written exam in which AL is verified in some capacity by instructor/organization. An example of the test must be available to the ICF Program Coordinator and uploaded in the application.
 - 12.4.3. Journaling or Paper- Participant will create a piece of work that summarizes/expands upon AL, which will be submitted to the instructor(s) for approval. Criteria for acceptable submission must be outlined for ICF Program Coordinator.
 - 12.4.4. Other- CCE applicants will be given an opportunity to create and outline a verification model that ensures demonstrated learning of the AL material within the application.
 - 12.4.4.1. A documented demonstration of learning is required.
 - 12.4.4.2. Validity of these methods will be decided on a case by case basis; acceptance of the model is at the Program Coordinator's discretion.

13. Past Unethical Behavior

The ICF accreditation team has the latitude to suspend, revoke, or deny an application based on previous behavior of a 'program' or individuals integral to the program's operations. Instances of unethical or questionable behavior prior to a program's submission (for accreditation by ICF) can be a legitimate barrier to the application process itself and subsequent accreditation.