May 5, 2017

Re: Accrediting Commission Report
April 2017 Meeting
(via email distribution)

Dear ACCET Members and Other Colleagues:

This letter provides information regarding actions undertaken by the ACCET Accrediting Commission at its April 2017 meeting. Within 30 days of the meeting, specific reports relative to the ACCET Commission's actions are published on the ACCET website under the "Commission" tab including: (1) Final Actions Taken by the Commission (referenced by institution), (2) Summary Statistics of Actions Taken by the Commission, and (3) a copy of this Accrediting Commission Report, which describes new and/or revised ACCET policy documents considered by the Commission for final approval or sent out for comment. Also available on the website is a request for written comments relative to institutions scheduled for consideration of accreditation at the Commission's August and December 2017 meetings.

A synopsis of the Commission's actions on ACCET policies undertaken at the April 2017 meeting is included as follows: (1) final documents approved by the Commission (available on the ACCET website under "Documents and Forms") and (2) call for comment on proposed revisions to policy documents.

As a reminder, the Commission's Standards and Policy Review Committee (SPRC) conducts an ongoing review of each ACCET policy document at least every five years. Additionally, SPRC considers specific policy documents for review and revision to address governmental regulatory requirements, arising issues of concern, and/or the need for additional policy guidance. Member institutions and other interested parties are invited and encouraged to submit their written comments to proposed changes to ACCET policies and standards (available on the ACCET website under "News").

FINAL APPROVAL

1. **Document 1 – <u>The Accreditation Process</u>**

    For purposes of clarity, the following language was added to the section on Readiness Visits: "*Prerequisites for the Readiness Visit are: (1) completion of a draft ASER and (2) attendance at an Accreditation Workshop.*"

2. **Document 1.1 – <u>Initial Accreditation Process</u>**

    For purposes of clarity, the following language was added to the section on Readiness Visits: "*Prerequisites for the Readiness Visit are: (1) completion of a draft ASER and (2) attendance at an Accreditation Workshop.*"

3. **Document 3.ESOL – <u>English for Speakers of Other Languages (ESOL)Template</u>**

   The Specific Field Criteria under Standard VI – <u>Instructional Methods</u> now requires that: "*The schedule of ESOL instruction: (1) is educationally sound, (2) facilitates language development, and (3) avoids excessive breaks in instruction that impede student language progression.*"

4. **Document 5 – <u>Guidelines for the Utilization of External Consultants in the Accreditation Process</u>**

   No substantive revisions were made, only changes for purposes of clarity.

5. **Document 7.1 – <u>Affirmation of Professionalism and Ethics</u>**

   Changes were made for purposes of clarity and to be consistent with Document 7 – <u>Guidelines for On-Site Evaluations</u> regarding the advanced preparation for on-site visits required by team evaluators.

6. **Document 8 – <u>Request for On-Site Evaluation Team Visit</u>**

   Changes were made to: (a) add new branch visits to the list of visits; (b) reorganize the sections on visits by adding a section on "*Visits Other Than Initial Accreditation and Reaccreditation*" and eliminating the section on "*Special Visits*"; (c) add Intensive English Programs as a type of institution; (d) request information to verify that institutions seeking initial accreditation and reaccreditation have attended the required Accreditation Workshop prior to the visits; and (e) eliminate references to classroom extensions.

7. **Document 17 – <u>ACCET Continuing Education Unit (CEU)</u>**

   No substantive revisions were made, only changes to the language for purposes of clarity.

8. **Document 21 – <u>ACCET On-Site Visit – Personnel File/Qualifications Checklist</u>**

   No substantive changes were made.

9. **Document 25 – <u>Policy for New, Revised, and Existing Programs/Courses</u>**

   A section was added under "*What Requires a Partial Application*" to identify the process for the discontinuation of a program that requires no processing fees.

10. **Document 25.1 & 25.2 – <u>Applications for New or Revised Programs/Courses and Corresponding Application Checklist</u>**

    The following changes were made to: (1) combine the Application for New or Revised Program/Course (Document 25.1) with the corresponding application checklist (Document 25.2); (2) expand the section on the type of program action proposed; and (3) request the rationale for program changes.

11. **Document 25.10 – <u>On-Site Review of Assigned Credit Hours & Work Outside of Class</u>**

    No substantive changes were made.

12. Document 31.ESOL – <u>Cancellation and Refund Policy</u>

To highlight a change previously approved by the Commission, the policy now explicitly states that: "*An institution may <u>not</u> deny refunds to or on behalf of students who are terminated due to violations of the institution's written disciplinary and/or attendance policies or local, state, or federal law.*'`

13. Document 36 – <u>Leave of Absence Policy</u>

Approved is a separate leave of absence policy (LOA) applicable to all students, <u>except</u> international students enrolled in ESOL programs under F visas. The policy specifies that a LOA may be granted for emergency situations and for a maximum period of 180 days in any 12-month period or half the program length, whichever is less. The length and frequency of the LOA must not impede student progress and be reasonable within the context of the institution's curriculum. A LOA must: (a) be requested in writing by the student in advance of the leave, (b) approved in accordance with the institution's written policy, and (c) documented by the institution. The institution's LOA policies must also consistent with federal requirements, which may differ from ACCET policy and, if stricter, take precedence.

14. Document 36.ESOL – <u>Leave of Absence and Vacation Policies</u>

Approved is a separate leave of absence (LOA) and vacation policy applicable to international students enrolled in ESOL programs under F visas. The policy specifies that the length and frequency of any vacations and school breaks must: (a) be reasonable within the context of the institution's curriculum, (b) consistent with sound educational practice, (c) reasonable relative to the period of student completed by the student, and (d) consistent with the institution's published policy. The institution's vacation and LOA policies must also be consistent with ACCET and federal requirements, including those of SEVP which may differ from ACCET policy and, if stricter, take precedence.

In accordance with the policy, a leave of absence (LOA) is a temporary break in study during which time an international F student must be out of the United States. An LOA must: (a) be requested in writing by the student in advance of the leave, (b) approved in accordance with the institution's written policy, and (c) documented by the institution. Additionally, the institution may not assess the student any additional charges as a result of the LOA. The institution must have a written policy that is educationally sound for assessing the student's language proficiency before reentry into the student's language program.

The institution's vacation policy must ensure that: (a) a vacation is only granted after a student completes an extended period of study (at least 12 consecutive weeks of attendance). Vacations must only occur at the completion of a student's term or session and may not be granted as a means to excuse student absences.

CALL FOR COMMENT

1. Document 3.ESOL – <u>English for Speakers of Other Languages (ESOL) Template</u>

To be consistent with other program templates, proposed is expand the Specific Field Criteria under Standard VI – <u>Qualifications of Instructional Personnel</u> to state: "*Transcripts and/or other*

pertinent documentation are on file to support the qualifications of instructors and document that instructional staff meet these minimum requirements.

2. **Document 3.LPN – <u>Practical Nursing Template</u>**

ACCET is pursuing recognition with the Accreditation Commission for Education in Nursing (ACEN) to enable ACCET-accredited institutions to seek ACEN programmatic accreditation should they elect to do so. As part of this initiative, ACCET has drafted Document 3.LPN – <u>Practical Nursing Template</u> with Specific Field Criteria for Licensed Practical Nursing (LPN) and Licensed Vocational Nursing (LVN) programs that align with ACEN Standards. In advance of the April ACCET Commission meeting, the draft template was reviewed by: (1) ACCET's former Commission Chair who is a nurse educator and (2) the Nursing Directors of four ACCET-accredited institutions that offer LPN or LVN programs. Highlighted in red font (and upper case) are their proposed changes to the Specific Field Criteria.

3. **Document 11 – <u>Policies and Practices of the Accrediting Commission</u>**

Proposed is to add the following provision for applicants seeking initial accreditation: "*An institution that is denied initial accreditation is not automatically eligible to reapply for accreditation. The institution must first seek and obtain the permission of the Commission to apply.*" Also proposed is to modify the process to appeal adverse actions by allowing ACCET representatives to present additional documentation and/or testimony for up to 45 minutes in response to the institution's presentation and/or appeals brief.

4. **Document 28 – <u>Completion and Placement Policy</u>**

Proposed is to codify what is the Commission's practice by stating: (a) *The Commission will regularly review reported completion and placement statistics, along with supporting documentation and may direct an external audit of the completion and placement records, as warranted, to ensure that the data is accurately reported; (b) In its evaluation of each vocational program offered by an ACCET accredited institution for which the benchmarks are not met, the Commission will take into account higher-than-benchmark placement rates in a given program to allow some degree of offset for below-benchmark completion rates in that program*; and *(c) If an institution chooses to utilize a third party to verify job placement, all requirements as noted in this policy must be implemented, and the institution is ultimately responsible for the accuracy of the data collected and reported.*

5. **Document 36.ESOL – <u>Leave of Absence, Medical Leave, and Vacation Policy</u>**

Proposed is the addition of a section pertaining to a medical leave (reduced course load) policy applicable to avocational ESOL programs with international F visa students. A medical leave is defined and specific provisions are proposed for approving and documenting a medical leave (reduced course load) for medical purposes.

6. **Document 40 – <u>Monitoring Institutions and Potential Risk Factors</u>**

ACCET strives to ensure positive student outcomes (completion and job placement), moderate and balanced growth, and financial stability at its member institutions through ACCET's long-standing policies, annual reporting requirements, and regular processes for monitoring institutions. To augment

these efforts, ACCET is establishing a process to systematically monitor potential risk factors of ACCET-accredited institutions and institutions seeking ACCET accreditation in order to expand and enhance ACCET's ongoing and thorough review of institutions and to inform the decisions of the Commission. Through this process, ACCET will regularly review and take appropriate actions relative to potential risk factors including, but are not be limited to those listed below:

Institutional Measures:
    a. Three-Year Cohort Default Rates of 30% or above or Annual Cohort Default Rates of 40% or above;
    b. Heighten Cash Monitoring 1 and 2;
    c. State or Federal approval withdrawn;
    d. State or Federal Approval Restricted;
    e. Denied or Withdrawn Accreditation;
    f. Institutional Show Cause;
    g. Restrictions and Reporting;
    h. Complaints Closed with Merit;
    i. Follow-Up Visit Required;
    j. FRC Issues, such as reporting:
        i. A net loss in either of the two most recently completed fiscal years;
        ii. A negative net worth in either of the two most recent years;
        iii. A negative cash flow in either of the two most recent fiscal years.
    k. Provisional Program Participation Agreement (PPA);
    l. Other (e.g. litigation against the institution, Program Reviews with significant liabilities).

Enrollment and/or Revenue Trends
    a. Enrollment decrease by 20% or more;
    b. Enrollment increase by 20% or more;
    c. Revenue decrease by 20% or more.

Site Changes in Past 24 Months
    a. Number new branches;
    b. Number closed branches.

Programmatic Measures:
    a. Program Probations;
    b. Failing Debt-to- Earnings Score.