



***Re: Accrediting Commission Report
August 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 August 2017 meeting. Specific reports relative to the August 2017 Commission meeting will be available 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 call 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 December 2017 and April 2018 meetings.

A summary of Commission actions taken at the August 2017 meeting regarding ACCET policies is provided below, including: (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.

At the August 2017 meeting, the Commission approved **changes to the on-site completion and placement verification process for vocational institutions** to be piloted beginning with the December 2017 review cycle, as identified in the following approved new documents: (1) Document 28.3 - Completion and Placement Verification Pilot and (2) Document 28.4 – Criteria for an Eligible Independent Third-Party Employment Verification Auditor and Required Scope of Work. The Commission also approved revisions to Document 28 – Completion and Placement Policy and Document 8.1 – Preparation Checklist for the ACCET On-Site Evaluation Visit,

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 3.ESOL – English for Speakers of Other Languages (ESOL) Template

To be consistent with other program templates, approved was an expansion of the Specific Field Criteria under Standard VI – Qualifications of Instructional Personnel 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 – Practical Nursing Template

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 approved Document 3.LPN – Practical Nursing Template with Specific Field Criteria for Licensed Practical Nursing (LPN) and Licensed Vocational Nursing (LVN) programs that align with ACEN Standards. In June 2017, the Executive Director of ACEN reviewed ACCET’s proposed template and recommended additional changes to the Specific Field Criteria, including the deletion of certain ACEN criteria and the requirement that the Specific Field Criteria in the ACCET template reflect ACEN’s exact language.

3. Document 3.AH – Allied Health Template

With the creation of the Practical Nursing Template, approved is a change to convert the Nursing and Allied Health Template to an Allied Health Template by eliminating all references to nursing programs.

4. Document 7 – Guidelines for On-Site Evaluation Teams

Approved is the addition of the following language: *“For vocational institutions, additional team members may also be required to assist with the on-site verification of completion and placement at campuses with large enrollments to ensure an adequate review by the team.”*

5. 8.1 - Preparation Checklist for ACCET On-Site Evaluation Visit

Approved are changes to ensure that institutions are prepared in advance of their visits for the completion and placement verification process and, thereby, facilitate the on-site verification process and avoid undue delays in conducting the verification process.

- *Completed ACCET Document 28.1 - Completion and Placement Statistics for each program in the current year-to-date and completed updated ACCET Document 28.1 for each program in the previous calendar year (**Vocational**).*
- *Completed On-Site Sampling Verification Forms (OSVF) for each program to support the data reported on ACCET Document 28.1s for the calendar year identified in the table below. For each program, prepare a separate OSVF for each month in which there were gross starts reported on the Document 28.1.*

<i>Calendar Year for On-Site Verification Forms (OSVF)</i>	<i>Visit Schedule</i>
<i>Previous Calendar Year</i>	<i>April Review Cycle (January-February Visits)</i>
<i>Previous Calendar Year</i>	<i>August Review Cycle (May-June Visits)</i>
<i>Current Year-to-Date</i>	<i>December Review Cycle (September-October Visits)</i>

*Note: While on-site, the team may also request OSVF forms to be completed by the institution for the year not specified above (either the current year-to-date or the previous calendar year). (**Vocational**)*

- *If applicable, a narrative identifying any independent third-party used by the institution to verify the employment of graduates reported on Document 28.1. Identify the following information for*

the utilized third-party employment verification auditor: (1) the name, (2) address, (3) telephone number, (4) name, title, telephone number and email address of contact person, and (5) website address. Provide an attestation and any other pertinent documentation to demonstrate that the auditor meets ACCET criteria to be an eligible, independent third-party employment verification auditor. (vocational institutions).

6. Document 11 – Policies and Practices of the Accrediting Commission

Approved is the following provision for applicants seeking initial accreditation: “*An institution that has been denied accreditation has the right to appeal the Commission’s action. 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, with the decision of the Commission final.*” Additionally, a change to the appeals process for institutions seeking to appeal the Commission’s adverse decisions was approved to allow 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.

7. Document 28 – Completion and Placement Policy

Approved are changes to codify what is Commission’s long-standing 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.* Also approved is a provision stating that: “*If an institution chooses or is directed by the Commission to utilize an independent third party to verify the employment of program graduates, all ACCET requirements must be implemented, including those identified in this policy. The institution is responsible for ensuring that its selected employment verification auditor meets ACCET’s criteria to be an eligible independent third-party employment verification auditor, with the institution ultimately responsible for the accuracy of the data collected and reported.*”

8. Document 28.3 - Completion and Placement Proposal

Approved are the changes identified below to enhance the ACCET on-site placement verification process to ensure its effectiveness at campuses with large student enrollments. The following changes are to be piloted by ACCET beginning with the December 2017 review cycle:

- *Require all vocational institutions to complete, in advance of their visits, the On-Site Sampling Verification Form for all student cohorts in all programs. This will ensure that institutions are well prepared for the on-site completion and placement verification process. It will significantly expedite the on-site review of the team and avoid undue delays in conducting the verification process.*
- *Maintain the current completion and placement verification process for any initial or reaccreditation visit to a campus with less than 450 enrollments in vocational programs reported for the “current year” on Document 12b – Annual Report and Enrollment Statistics.*
- *Add an extra team member to assist with the completion and placement verification process for any initial or reaccreditation visit to a campus with 450 – 999 enrollments in vocational programs reported for the “current year” on Document 12b.*

- *To supplement the on-site completion and placement verification process, require third-party verification of placements for any initial or reaccreditation visit to a campus with 1,000 or more enrollments in vocational programs reported for the “current year” on Document 12b.*

The document contains notes that provide additional guidance regarding the completion and placement verification pilot.

9. Document 28.4 - Criteria for an Eligible Independent Third-Party Employment Verification Auditor and the Required Scope of Work

Approved is a new document identifying the criteria to meet ACCET’s requirements to be an eligible independent third-party employment verification auditor and the scope of work required of the auditor.

10. Document 29 – Catalog Guidelines and Checklist

To be consistent with Document 31 – Cancellation and Refund Policy, approved is a change to Document 29 to reference “application/registration fee” instead of “registration fee.”

11. Document 29.1 – Enrollment Agreement Checklist

To be consistent with Document 31 – Cancellation and Refund Policy, approved is a change to Document 29.1 to reference “application/registration fee” instead of “registration fee.”

12. Document 36.ESOL – Leave of Absence, Medical Leave, and Vacation Policy

Approved is a new section with 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 required for approving and documenting a medical leave (reduced course load) for medical purposes.

13. Document 40 – Monitoring Institutions and Potential Risk Factors

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 approved a new 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. Programmatic Probations;
- b. Failing Debt-to- Earnings Score.

CALL FOR COMMENT

1. Document 11 – Policies and Practices of the Accrediting Commission

To be consistent with the requirements of the US Department of Education, proposed is a change to require a Commissioner to recuse himself/herself from the proceedings while the Accrediting Commission is discussing or formally taking a vote on actions regarding any institution for which the Commissioner served as a team evaluator on the institution’s on-site visit(s) under review.

2. Document 49 – Policy and Procedure for Processing Complaints Initiated Against ACCET Accredited Institutions

A change is proposed to lengthen the period of time (from six months to two years) within which a complaint may be considered by ACCET. The proposed revision states: *“To ensure the timely submission and resolution of a complaint and to enable there to be a thorough investigation of the allegations, a complaint from a former student or employee is to be submitted on a timely basis. Absent extenuating circumstances, complaints from students or employees separated from an institution for more than two years may not be processed.”*

Additional proposed changes are as follows: *“For institutions seeking initial accreditation and reaccreditation, the Commission will consider complaints received by ACCET during the application period for initial applicants and during the most recent accreditation period for accredited institutions (a maximum of five years), including a summary of complaints closed with merit and/or partial merit. The Commission will take this information into consideration during its deliberations regarding the accreditation of institutions.”*