



TO: ACCET Institutions

From: Judy Hendrickson, Interim Executive Director

Date: May 21, 2020

RE: Further ACCET Guidance – COVID-19 Additional Temporary Flexibilities

ACCET is closely monitoring the situation regarding the coronavirus (COVID-19) and providing our member institutions additional guidance as it becomes available. On May 21, 2020, the ACCET Commission convened and approved: (1) additional temporary flexibilities and (2) extensions to previously approved temporary flexibilities for ACCET institutions in response to COVID-19. Provided below are temporary flexibilities approved to date by the Commission, with those approved on May 21, 2020 highlighted in *italics*.

Temporary Flexibilities:

ACCET guidance provides certain flexibilities for institutions that are working to help students complete the term in which they are currently enrolled and identifies options available to institutions so that they can continue to serve current students during the coronavirus emergency (the payment periods that begin on or between March 5, 2020 – December 31, 2020), including:

- Temporary closure.
- Temporary distance learning (IDL) delivery.
- Change in student enrollment status (e.g. full-time to part-time status) (This option is not available to IEPs).
- Consortium agreements (This option is not available to IEPs).
- Temporary change of location (This option is only available to IEPs).

NOTE: The temporary flexibilities authorized to ACCET institutions during the COVID-19 threat are finite. Currently, institutions are permitted (without program approval) to temporarily offer distance learning (IDL) to new students through December 31, 2020, with the following exception. The Student Exchange Visitors Program (SEVP) does not permit the enrollment of new F and M students.

Annual Reporting:

1. The May 1, 2020 deadline for the submission of the Annual Completion and Placement Report will be postponed to July 1, 2020, and institutions will only be required, at a minimum, to provide a partial year report for 2019 (January 1 – September 30), a period before the effect of COVID-19. Institutions may elect to submit a 2019 report that extends beyond September 30, 2019 such as a 12-month report for 2019 (January 1 – December 31).
2. *The 2019 deadline for the submission of an institution's annual financial statements will be postponed by six months and due within 12 months of the institution's fiscal year end (FYE).*

Externships:

Institutions will be permitted the temporary flexibility of offering students whose scheduled internship/externship is disrupted during the period of March 5, 2020 – December 31, 2020 due to COVID-19 their (each student's) choice to either:

1. complete a rescheduled externship/internship, which may require the student to take a leave of absence; or
2. complete, in lieu of internship/externship, a capstone course comparable in length (clock hours or credit hours) to the internship/externship, unless prohibited by any applicable licensing boards and/or other approval or certifying authorities.

Labs:

Institutions will be permitted the temporary flexibility of offering students whose scheduled labs are disrupted during the period of March 5, 2020 – December 31, 2020 due to COVID-19 their (each student's) choice to either:

1. complete rescheduled labs, which may require students to take a leave of absence;
2. complete simulated labs that: (a) provide synchronous (real time) sharing of hands-on practice using video conferencing, and (b) assess students' skills based on observed levels of performance during lab time. Note that this option is not permissible if prohibited by any applicable licensing boards and/or other approval or certifying authorities; or
3. Complete didactic classes comparable in length (clock hours or credit hours) to the labs missed due to COVID-19 on the condition that the institutions schedule make-up labs in the future to provide students the opportunity to subsequently complete labs necessary for students to develop and practice their hands-on skills. Note that this option is not permissible if prohibited by any applicable licensing boards and/or other approval or certifying authorities.

Verification of High School (or Equivalent) Completion Status:

Where an institution is unable to obtain documentation of an applicant's high school completion or equivalency, an institution will be permitted the temporary flexibility to accept a signed and dated attestation from an applicant attesting to his or her high school completion and approximate date of completion in lieu of the applicant's official high school diploma, official transcript, or high school equivalency certificate during the COVID-19 emergency period through December 31, 2020. Note that this temporary flexibility is not permissible if prohibited by any applicable state and/or other approval or certifying authorities.

Leaves of Absence (LOA):

Institutions will be permitted the following temporary flexibilities from March 27, 2020 – December 31, 2020 relative to leaves of absence, including:

1. *Waiving the requirement that: (a) the institution must approve a written and signed leave of absence request by the student prior to the leave of absence and (b) the student returning from a leave of absence (LOA) must resume at the same point in his/her program that the student began the LOA.*
2. *Establishing, even on a temporary basis, a formal written leave of absence policy consistent with any state, federal, and accreditation requirements, if the institution previously did not have a formal written policy.*

Satisfactory Academic Progress (SAP):

Institutions will be permitted the following temporary flexibilities from March 27, 2020 – December 31, 2020 relative to satisfactory academic progress (SAP):

- 1. An institution may exclude from the quantitative component (pace measurement) of satisfactory academic progress (SAP) attempted credits/hours a student was unable to complete as a result of the COVID-19 national emergency.*
- 2. It is not necessary for a student to have filed a SAP appeal for an institution to exercise the flexibility identified in item #1. However, to exclude attempted credits/hours from SAP, an institution must have reasonably determined that the student's failure to complete those credits/hours was the result of a COVID-19 related circumstance. Allowable circumstances include, but are not limited to, (a) illness of the student or family member, (b) need to become a caregiver or first responder, (c) economic hardship, (d) added work hours, (e) loss of childcare, (f) inability to continue with classes via distance education, (g) inability to access wi-fi due to closed facilities. If an institution temporarily ceases operations during a period of enrollment, attempted credits for all affected students (specific to that enrollment period) may be excluded.*
- 3. Regarding the effect of excluding attempted credits on maximum timeframe, SAP regulations require that the pace at which students progresses through the program ensures completion of that program within the maximum timeframe (150% of program length). However, if credits/hours the student attempted but was unable to complete are excluded due to a COVID-19 related circumstance, the credits/hours will be effectively excluded from the maximum timeframe as well as the measurement of pace.*

Streamlined IDL Program Application:

ACCET will streamline and facilitate the IDL program approval process to institutions seeking to continue their temporary IDL instructional delivery as follows:

1. ACCET institutions that are temporarily offering interactive distance learning (IDL) in response to COVID-19 will be eligible to: (a) submit a streamlined IDL program application and (b) pay a reduced application fee (\$1,050 instead of the regular \$2,000 fee), if the application is submitted before August 31, 2020. Further, the required program visits may be conducted virtually with a reduced visit fee (\$2,400 instead of the regular \$4,800).
2. The required IDL program visit will be conducted virtually, with no requirement of a subsequent on-site program visit.
3. An additional emergency flexibility will allow the retroactive approval of IDL program applications submitted by August 31, 2020, as follows:
 - Interim Approval for the institution's first IDL program will be granted retroactive to the date a complete and fully compliant IDL program application was submitted to ACCET.

NOTE: The retroactive date of IDL program interim approval may or may not be the date the program application was initially submitted, as program applications are frequently determined to be incomplete and out of compliance with ACCET requirements, which requires the resubmission of the applications.

4. An institution offering temporary IDL delivery that submits an initial IDL program application by August 31, 2020 will be allowed to submit additional IDL program application(s) by December 31,

2020, without having to first demonstrate the successful outcomes of graduates of its first approved IDL program.¹

5. The IDL program approval process for an institution offering temporary IDL delivery that submits its first IDL program application by August 31, 2020 and subsequently submits additional IDL program application(s) by December 31, 2020 will be as follows:
 - The additional IDL program applications will be considered for Interim Approval until the institution is granted final approval for its first IDL program by the Commission.
 - *Interim Approval for each additional IDL programs will be granted retroactive to the date a complete and fully compliant IDL program application was submitted to ACCET.*
 - Final approval of the additional IDL program applications will be considered after final approval is granted to the first IDL program.

IDL Webinars:

1. ACCET staff will conduct a series of free 90-minute IDL webinars, beginning on March 9th, including webinars focused on IDL best practices and how to prepare the streamlined IDL application.

Virtual ACCET 2020 Annual Conference:

1. A Virtual 2020 ACCET Conference (August 13-14, 2020) will be scheduled in place of the Lake Tahoe 2020 Conference (November 11-13) due to the uncertainties pertaining to COVID-19. Information and registration for the conference to follow soon.

August 2020 Review Cycle:

1. Visits scheduled in May and June (except those identified in # 2 below) will be postponed one cycle and conducted in the December review cycle (September - November visits).
2. The submission deadline for visits fees will be extended from the original date of March 2, 2020 until June 6, 2020. Additionally, visit fees may be made in two monthly installments, with the first due on June 6, 2020 and the second due on July 6, 2020.
3. Readiness Visits (RV) and other visits such as substantive change visits (e.g. changes of ownership and re-designations of the main campus) may be conducted virtually as originally scheduled (May and June visits) with the consent of the institutions at a reduced visit fee (e.g. \$2,100 instead of \$2,400 for one-day/one-person visits).
4. The August 2020 Commission meeting will be conducted electronically to reduce expenses during these lean times and scheduled Monday, August 3, 2020 – Friday, August 7, 2020.

¹ Document 25 – Policy on New, Revised, and Existing Programs/Courses states: “Institutions that have never offered IDL courses/programs (defined as any course or program with at least a portion offered via IDL technology) must seek prior approval from ACCET for an out-of-scope program, including situations involving the application of IDL methodology to already-approved courses/programs of study. To be eligible for approval of additional IDL courses/programs, an institution must first demonstrate the successful outcomes of graduates of its initial approved IDL program/course (e.g. above benchmark completion and, if applicable, placement rates), based upon the submission of a comprehensive report.”

December 2020 Review Cycle:

1. During the December 2020 visit cycle, *virtual visits* will be scheduled over a three-month period (September – November 2020) in order to conduct: (a) visits postponed from the August 2020 cycle and (b) visits originally scheduled in the December 2020.
2. For institutions seeking reaccreditation, their ASER submission deadline will be extended by one month to August 6, 2020, and on-site visits will be conducted in September – November 2020.
3. The submission deadline for visits fees also will be extended by one month and be due by August 6, 2020. Additionally, visit fees may be made in two monthly installments, with the first due on August 6, 2020 and the second due on September 6, 2020.
4. One-cycle extensions may be requested and granted on an exceptional basis for reasons such as:
 - The institution was temporarily closed due to COVID-19;
 - The institution was prohibited from enrolling new students due to COVID-19; or
 - The institution demonstrated extraordinary hardships due to the COVID-19 crisis.

If the one-cycle extension is granted, visit fees will continue to be due on August 6, 2020, as scheduled for the December 2020 review cycle.

Note: It will **not** be feasible for all institutions in the December review cycle to be postponed to 2021, because of the need to maintain ACCET’s compliance responsibilities, continued financial viability, and administrative capacity. It is significant to note that the April and August 2021 visit cycles are already near capacity and can only absorb a limited number of additional visits.

A one-cycle extension may not be granted to institutions that: (a) are entitled to funding through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act); and/or (b) were able to continue to enroll new students and temporarily offer IDL instruction during the COVID-19 threat.

5. Other visits scheduled in the December 2020 review cycle will be scheduled in September – November, 2020, and visit fees will be due on August 6, 2020.
6. Readiness Visits (RV), Quality Assurance Visits (QAV), and other visits such as substantive change visits (e.g. changes of ownership and re-designations of the main campus) may be conducted virtually with the consent of the institutions at a reduced fee (e.g. \$2,100 instead of \$2,500 for one-day/one-person visits).
7. *As required by the U.S. Department of Education, follow-up on-site visits will be scheduled in a timeframe that is reasonably practicable to institutions that have virtual visits for purposes of accreditation, reaccreditation, and/or substantive changes. At a minimum, these on-site visits will be one-day/one-person visits to verify: (a) the facility, (b) student satisfaction, and (c) compliance with any standards with a rating of “1” or “2” in the virtual visit team report.*
8. *The fee for the virtual visit will be \$2,100 per person instead of the usual \$2,400. The virtual visit fee will include the cost of a 1-day/1-person follow-up on-site visit, required by the U.S. Department of Education. Note that an expanded follow-up on-site visit directed by the Commission will result in an increased on-site visit fee.*