

## ACCET DOCUMENT 49 – ACCET Policy for Processing Complaints against ACCET-Accredited Institutions and Applicant Institutions

**Purpose:** The purpose of this policy document is to establish a standard method for processing complaints involving ACCET standards, policies, and procedures about a member institution or an institution whose submitted application for initial accreditation remains active.

**Policy Requirements:** Accreditation is a partnership for quality in which an institution must meet established standards of educational quality. Toward that end, ACCET-accredited institutions and applicants are responsible for maintaining ongoing compliance with the ACCET Standards for Accreditation and must inform students of their right to communicate with ACCET regarding complaints relative to noncompliance with these standards. Accordingly, accredited and applicant institutions will:

1. Maintain a reasonable internal grievance policy to receive and resolve complaints and disclose said policy in written form to all students at the time of enrollment.
2. Notify ACCET in writing within 10 days of any action or complaint filed against it by a governmental agency having regulatory authority over it, furnishing with the notification a copy of the items filed against it. (Refer to ACCET Document 48 – Policy on Adverse Actions and Other Negative Actions by Federal, State, and Other Accrediting Agencies.)
3. Inform students of their right to contact ACCET with a complaint, including (a) making available ACCET Document 49.1 – Notice to Students: ACCET Complaint Procedure or ACCET Document 49.2 – Notice to Students: ACCET Complaint Procedure for Institutions Seeking ACCET Accreditation in a readily accessible, prominent location at the school and/or online.

**Commission Review of Complaints:** The ACCET Accrediting Commission will regularly review and consider complaints filed against ACCET institutions and institutions seeking ACCET accreditation. A complaint analysis will be provided to the Commission at each regularly scheduled Commission meeting to include complaints processed and/or received since the previous Commission meeting, as well as other such information the Commission may request. 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 deliberation regarding the accreditation of institutions.

### Procedures for Processing a Complaint:

An accreditation staff member who is responsible for processing complaints is designated as the Chair of the Complaint Review Committee, which comprises the Executive Director and accreditation staff. This body may collectively resolve complaints by vote, as authorized by the Executive Director. Copies of complaints and related documents will be placed in the institution's file upon resolution.

Complaints must relate to ACCET standards, policies, and/or procedures. They must be initiated by an identifiable or anonymous source, student, or non-student, and/or ACCET, and they must be

submitted in writing via the webform [Complaint Submission Form](http://www.accet.org) on ACCET's website (www.accet.org).

Complaints received via the webform are date stamped and routed to the Chair of the Complaint Review Committee for an initial determination of relevance to ACCET standards, policies, and/or procedures and may subsequently be reviewed with the Executive Director and/or the Complaint Review Committee for further consideration.

Anonymous complaints will be processed according to the policy and procedures outlined herein, and specific requests for anonymity by an identifiable source will be honored by all reasonable means. Complaints submitted anonymously must include substantive representation of allegations relating to ACCET standards, policies, and/or procedures; otherwise, such complaints lacking sufficient detail may lead ACCET staff to a preliminary determination that the complaint be dismissed.

Information ACCET receives not as a complaint, but which indicates that the accredited institution may be in violation of ACCET standards, policies, or procedures, may require ACCET to initiate a formal complaint based on that information. These complaints will be processed according to this policy.

#### **Initial Determination about a Complaint:**

1. Upon receipt of a complaint, the Chair of the Complaint Review Committee will first determine if the matter involves ACCET standards, policies, and/or procedures. The complainant(s) will be notified accordingly.
2. A further consideration in determining whether to process a complaint is the length of time since the alleged incident in the complaint occurred. 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.
3. If the complaint relates to ACCET standards, policies, and/or procedures, it will be determined to be a complaint with urgency or without urgency. A complaint will be deemed one with urgency if upon an initial review:
  - a. the basis of the complaint appears to be well founded, and
  - b. the seriousness of the issues, degree of potential or actual harm, the number of individuals impacted, the history of the institution, and/or the time-sensitivity of the allegations warrant an urgent resolution of the complaint.

#### **Complaints without Urgency:**

Unless there are mitigating circumstances, complaints without urgency will be processed within the time frames identified below:

1. Upon receipt of the complaint, ACCET will provide an acknowledgement of receipt within 15 business days, conduct a timely review of the complaint, and request any necessary follow-

up, such as obtaining sufficient detail and clarity to permit an institution to respond effectively to the complaint and to permit ACCET to make a determination of the facts relating to the complaint.

2. Within approximately 15 business days of receipt of the complaint and any necessary follow-up, ACCET will provide written notification to the institution summarizing the actionable allegations contained therein as related to specific ACCET standards, policies, and/or procedures. A copy of the complaint letter will be included in the notification unless the complainant specifically requests anonymity. The notification letter will direct the institution to submit a written response addressing the allegations and, if appropriate, demonstrating its efforts to resolve the complaint. Any written notice from ACCET to an institution will be made by email or other means to prove the exact date of delivery. The institution's response will be due within 14 business days from the date the institution receives official notification from ACCET.
3. Following receipt by ACCET, the institution's response will be reviewed by the Complaint Review Committee to determine whether:
  - a. The complaint was resolved by the institution, and the complaint will be closed in accordance with the policy described below,
  - b. The complaint is being resolved by the institution, in which case the matter will be regularly monitored by ACCET to conclusion,
  - c. Additional specific action or information is required of the institution, in which case ACCET will so notify the institution and continue to monitor to conclusion, or
  - d. The matter is of sufficient seriousness to require processing as a complaint with urgency.
4. If the institution fails to respond as directed, the complaint may be treated as one with urgency and processed accordingly.
5. Any complaint under this procedure not resolved within 90 days from its receipt by ACCET may be deemed a complaint with urgency and processed accordingly.

**Complaints with Urgency:**

1. If, upon conferral with the Executive Director and/or Complaint Review Committee, a complaint is deemed to be one with urgency, the processing of the complaint may be expedited.
2. Additional action may be required, in which case the Executive Director or designee will confer with the Chair of the Accrediting Commission to determine appropriate action. This may include one or more of the following actions:
  - a. Adjusting the notice and response periods and proceeding as in other cases.
  - b. Initiating an announced or unannounced on-site visit by a team of the number and composition appropriate to the circumstances, to be conducted under established procedures for such visits. If such a visit is directed, the institution may be required to provide its response to the complaint in conjunction with the institutional response to the team report.

- c. Issuing an order for Show Cause under the procedures for show cause.
- d. Referring the matter to the full Commission for review and action as it directs. Any complaint with urgency remaining unresolved 60 days after receipt by ACCET may be referred to the Commission.

In cases involving items (b) or (c) above, or where the institution has not demonstrated substantial progress leading to closure and/or resolution, the complaint will be forwarded to the Accrediting Commission at its next regularly scheduled meeting for further review and action.

**Complaints Initiated by ACCET:**

1. ACCET may initiate a complaint against an institution upon receipt from any source of adequate information from which one may reasonably believe that a violation of ACCET standards or policies exists.
2. Upon learning of such information, ACCET will conduct an investigation to determine the credibility of the source and the seriousness of the possible violation. A written report of the findings will be made.
3. If a determination is made that a complaint be initiated by ACCET, the notification will be in writing with sufficient pertinent information to allow the institution to respond accordingly.

**Multiple Complaints against an Institution:** When an institution has three or more complaints closed with merit (full or partial) within a five-year period, subsequent complaints filed against the institution will be referred to the Commission for review and action if the Complaint Review Committee recommends that these complaints be closed with merit.

**Closure of a Complaint:** The determination to close a complaint will be made by vote of the Complaint Review Committee or, in such cases that are referred to the Accrediting Commission, by vote of that body. A complaint may be closed specifying that the original allegations were found to be with full merit, partial merit, or without merit. A complaint will be closed with partial merit if only some of the original allegations are found to have merit and/or the validated allegation(s) is determined to be minor in nature and scope, with no documented evidence of significant negative impact on students or other interested parties. The complainant and the institution will be notified in writing of the Committee's decision, within approximately 14 business days of the complaint closure. In the case of a complaint referred to the Accrediting Commission, notification will generally take place within 30 days of the Commission's decision. If no new or additional information is submitted by the complainant within 10 calendar days of receipt of the notification letter, ACCET will consider the complaint to be officially closed. A complaint may be reopened if information warranting such action is received.

**On-site Review of Complaints Filed against ACCET Institutions and Applicant Institutions:** During an on-site visit to an institution seeking initial accreditation or reaccreditation, the team will consider complaints filed against the institution and received by ACCET during the application period for initial applicants and during the most recent accreditation period for accredited institutions. This will include (1) complaints closed with merit and/or partial merit, (2) open complaints for which the institutions received notice and an opportunity to respond, and (3) any open complaints alleging fraud and/or falsification, if upon initial review the basis of the complaint appears to be well founded. Complaints filed since the last grant of accreditation will

also be considered during Quality Assurance Visits. The team will receive a summary complaint report identifying, at a minimum, the number of complaints filed against the institution, the names of the complainants, the dates of complaint submissions, the subject/nature of the complaints, the ACCET standards, policies, and procedures involved, and the complaint resolution (closed with merit, partial merit, or no merit). In evaluating the institution's compliance with ACCET standards, the team will include an assessment as to whether the issues raised in the complaint persists and whether there is any pattern of complaints. If warranted, the team's review of any complaints will be addressed under the relevant ACCET standard(s) in the team report.