



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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May 17, 2013

***Re: Accrediting Commission Report
April 2013 Meeting
(via email distribution)***

Dear ACCET and Other Colleagues:

This letter is presented as an update on the actions undertaken by the ACCET Accrediting Commission at its April 2013 meeting and subsequent teleconference meeting/call on April 29, 2013. A summary of all final actions, referenced by institution, a summary of statistics for all actions relative to the various classifications of review, and the policy/documentation revisions, previously posted and referenced herein, will be available to view and download from the ACCET website (www.accet.org). A synopsis of the Commission's actions on ACCET policies undertaken at the April 2013 meetings is included as follows: (1) solicitation of a call for comment (under "News") and (2) finalized document approvals (under "Documents and Forms"). To meet federal requirements for continued recognition by USDE, the Accrediting Commission granted final approval of revisions to ACCET documents to address issues raised by the U.S. Department of Education (USDE) in the Staff Report received by ACCET on April 8, 2013 following a staff review of the Petition submitted by ACCET for continued recognition by USDE. Concurrently, the Commission approved these final documents to go out for comment for further considered by the Commission at its August 2013 meeting.

As a reminder, the Commission's Standards and Policy Review Committee (SPRC) reviews specific policies that have been identified for review and revision to address governmental regulatory requirements, issues of concern arising from its reviews, and patterns of good practices, in addition to an ongoing review of policies that have not been subject to review for a period of five years. This report is posted on the website under Commission Reports.

Call for Comment Solicited

1. Document 33 – Definitions

Proposed is an expansion of the definition of "*Vocational Institution*" to include "*Vocational Institution/Program*", which identifies that some programs may be classified as either vocational programs or avocational/continuing education programs, depending upon the objective of the programs. A phlebotomy program is provided as an example.

2. Document 35 – Policy on Attendance Requirements

Proposed are changes to: (a) streamline wording, (b) specify that institutions offering Intensive English Programs must require students to achieve an 80% attendance rate to complete their term/session, and (c) clarify ACCET's policy relative to the potential application of federal or state requirements that institutions are required to follow by stating: "*The minimum acceptable attendance for students enrolled in vocational programs is an*

80% attendance rate for completion/graduation, unless a higher rate is required by an applicable state or federal agency.”

3. Document 50 FR – On-Site Financial Review Checklist

To better ensure that institutions demonstrate compliance with Standard II-A – Financial Stability, proposed is a change to require on-site teams to determine whether institutions are current in their payments of any rent or mortgage obligations, with no outstanding or delinquent payments.

4. Document 49 – Policy and Procedures for Processing Complaints Initiated Against ACCET Institutions

In preparing the ACCET Petition for continued recognition by USDE, issues were identified relative to the processing of complaints filed against ACCET institutions, including: (1) the procedures for review of complaints by on-site teams, and (2) the timeliness of the complaint process. Proposed is a change to the maximum timeframes for processing complaints, including those deemed “with urgency” and “without urgency”, as follows:

Steps in the Complaint Review Process	Timeframe – Maximum Days			
	Proposed		Existing	
	Without Urgency	With Urgency	Without Urgency	With Urgency
ACCET sends written notice of a complaint to the institution, along with a request for a written response.	7	7	14	7
The institution submits a written response to the complaint to ACCET.	10		20	10
The Complaint Review Committee reviews the complaint and response, with a follow-up response sent to the institution and complainant.	13		14	7
	30	Expedited Process	48	24

Also proposed is a change to identify a process for the on-site review of complaints filed against ACCET institutions, as follows: During an on-site evaluation visit to an institution seeking initial accreditation and reaccreditation, the team will consider complaints filed against the institution and received by ACCET during the application period for initial applicants or during the most recent accreditation period for accredited institutions. In advance of the visit, the team will receive a summary complaint report from ACCET identifying, at a minimum, the number of complaints filed against the institution, the names of the complainants, the dates of complaint submission, the subject/nature of the complaints, the ACCET standards involved, and the complaint resolution. In evaluating the institution’s compliance with ACCET standards, the team will identify whether there is any pattern(s) of complaints and whether the issues raised in the complaint(s) persist. The team’s review of any complaints will be addressed under the relevant ACCET standard(s) in the team report prepared by the team, as warranted.

Final Approval

1. Document 3.IDL – Interactive Distance Learning (IDL) Template

To effectively respond to the USDE Staff Report on the ACCET Petition, changes were made to the questions/statements under Standard IV-A, Educational Goals and Objectives to request the following additional information: “*Describe how the institution ensures that the clock hour requirements or applicable credit hour requirements are met for courses/programs offered in an online, asynchronous delivery mode*”.

To be consistent with federal requirements, changes were also made to the questions/statements under Standard VII-B, Enrollment to include: (1) requesting a description of the methods established by the institution to protect the privacy of students enrolled in IDL training and (2) reordering the bullets by moving to the last bulleted item the request for information relative to methods for verifying student identify and notifying students of additional charges related to verifying student identify.

2. Document 15 – Clock Hour and Credit Hour Policy and Document 25 – Policy for New, Revised, and Existing Programs

To effectively respond to the USDE Staff Report and to support proposed revisions to Document 3.IDL, modifications were made to Documents 15 and 25, including: (1) notifying institutions that: “*To ensure that IDL training is appropriate in content and length, ACCET will review IDL programs and/or courses, including those offered in an online, asynchronous delivery mode, to verify that clock hour requirements are met and that the length of the programs and/or courses (clock hours and/or credit hours) is appropriate and educationally sound*”; and (2) providing guidance to institutions as to the methods they may utilize to demonstrate that their IDL training meets these requirements.

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

To be consistent with federal requirements, the following changes were made:

- a. Revise the section on Consideration of Actions by the Federal, State, and Other Recognized Accrediting Agencies to mirror the language in the federal criteria (§602.28 Regard for decisions of State and Other Accrediting Agencies) to state that: “*In the evaluation of an institution’s application for initial accreditation or reaccreditation, the Accrediting Commission considers any pending or final adverse actions or other negative actions (e.g. probation or institutional show cause) taken against the institution by an accrediting agency recognized by the U.S. Department of Education or an agency of the state or federal government. Refer to ACCET Document 48 – Policy on Adverse Actions or Other Negative Action Taken by Federal, State, and Other Accrediting Agencies.*” These revisions clarify that, in making its decisions to grant initial accreditation or reaccreditation, the Accrediting Commission will consider not just final adverse actions, but also any pending adverse actions and other negative actions taken by other agencies against institutions.

- b. Revise the section on the Appeals Process to clarify that: (1) New financial information will only be admissible in appeals hearing if: *“The only remaining deficiency cited by the Commission in support of a final adverse action decision is the institution’s failure to meet ACCET Standard III-A, Financial Stability, with the institution’s non-compliance with Standard III-A the sole deficiency warranting a final adverse action”*. (2) On each appeals panel, there shall be a separate academic, administrative, and public member. and (3) In the interest of transparency, the names, qualifications, and relevant experience of appeals panel members shall be made public and posted to the ACCET website.
- c. Revise the section on Notifications to clarify the process relative to: (1) notice of initial accreditation, renewal of accreditation, denial or withdrawal of accreditation, and institutional show cause; (2) notice of a final decision to deny or withdraw accreditation or to place an institution on institutional show cause, including the posting of the decision to the website within 24 hours; and (3) the posting of either comments from an institution denied or withdraw accreditation (final action) or evidence of the opportunity for the institution to comment.
- d. Revise the section on Substantive Changes to clarify that: *“ACCET will not grant approval retroactively for a substantive change and will specify the effective date of the approval in the notice to the institution. Consistent with federal requirements, ACCET may designate the date of a change of ownership as the effective date of its approval of that substantive change, if the approval decision is made within 30 days of the change in ownership.”*

4. Document 13 – Bylaws

To more clearly articulate the Commission’s longstanding practices and to be consistent with federal requirements, changes were made to specify that: (a) *“Institutional Commissioners shall be drawn from both administrative and academic personnel, with each Commission fulfilling a separate role (academic or administrative member)”*. (b) *“To ensure balanced representation, the Executive Committee shall be comprised of at least one public Commissioner and two Institutional Commissioners drawn from academic and administrative personnel, with each Commissioner fulfilling a separate role (academic, administrative, or public member).”* (c) *“Accreditation decisions made by the Executive Committee, including decisions relative to interim or provisional approval of substantive changes, may subsequently be considered for final approval by the full Commission during regularly scheduled meetings in accordance with ACCET policies.”* and (d) Duties that cannot be delegated by the Commission include: *“granting initial accreditation or reaccreditation to an institution”*.

5. Document 22 – Policy on Change of Ownership and/or Control

Changes were made to clarify that, *“Consistent with federal requirements, ACCET may designate the date of a change of ownership as the effective date of its approval of that substantive change if the approval decision is made within 30 days of the change in ownership”*. For purposes of clarity and sound practice, the Commission added language to define when a waiver may be granted relative to the requirements for an on-site evaluation no later than six

(6) months from the date of the consummation of the change of ownership and/or control. The revision is as follows: “*An on-site evaluation will take place no later than six (6) months from the date of the consummation of the change of ownership and/or control, unless subject to a waiver due to unique circumstances (e.g. an avocational institution franchised/licensed by an ACCET accredited institution, which provides supervision, control, written assurances and financial protections to its franchisee/licensee); however, visits are mandatory to Title IV eligible institutions and other institutions for which accreditation is required to participate in federal programs (e.g. Intensive English Programs).*”

6. Document 48 – Policy on Adverse Actions and Other Negative Actions by Federal, State, and Other Accrediting Agencies

Changes were made to be consistent with federal criteria (§602.28 Regard for decisions of State and Other Accrediting Agencies), to clarify that before granting initial accreditation or reaccreditation, the Accrediting Commission will consider any pending or final adverse actions and other negative actions (e.g. probation or an equivalent status) taken against the institution by a state, federal, or other recognized accrediting agency. These revisions clarify that, in making its decisions to grant initial accreditation or reaccreditation, the Accrediting Commission will consider not just final adverse actions, but also any pending adverse actions and other negative actions taken by other agencies against institutions. Additionally, the Secretary will be provided a thorough and reasonable explanation if the Commission grants initial accreditation or reaccreditation to any institution (not only a Title IV-eligible institution) that is subject to a pending or final adverse action or other negative action taken by another recognized accrediting agency or agency of the federal or state government.

Thank you for your continued commitment and responsiveness to our ongoing efforts to refine and strengthen the ACCET standards, policies, and practices, as well as those mandated through regulatory requirements on the agency’s continued recognition by the U.S. Department of Education. ACCET’s Petition for continued recognition will be presented to the National Advisory Committee for Institutional Quality and Integrity (NACIQI) on June 7, 2013, with the expectation of a favorable review and result. Your daily contributions to this Partnership for Quality® in service to your students are the foundation on which our combined accomplishments are measured. Thank you.

Sincerely,



Roger J. Williams
Executive Director