



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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April 30, 2019

VIA EMAIL
(candrews@ncra.org)

Ms. Cynthia Andrews
Senior Director, Education and Certification
National Court Reporters Association
12030 Sunrise Valley Drive, Suite 400
Reston, VA 20191-3484

***Re: Reaccreditation Deferred;
Interim Report Required;
Institutional Show Cause Issued***

ACCET ID #275

Dear Ms. Andrews,

At its April 2019 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) considered the application for reaccreditation approval of the National Court Reporters Association in Reston, Virginia, the on-site visit team report visit conducted February 11-12, 2019, and the institution's response to that report, dated March 28, 2019. Upon its review at the April 2019 meeting, the Commission voted to extend the institution's accredited status until August 30, 2019 and defer further action pending receipt of additional information. The Commission also voted to issue a show cause directive, requiring the institution to provide a compelling rationale as to why its accredited status should not be withdrawn due to serious concerns regarding the volume and pattern of non-compliance with ACCET standards, policies, and procedures.

The institution's response adequately addressed one of seventeen weaknesses raised in the on-site team report. The following issues are in need of further clarification and/or resolution relative to ACCET standards, policies, and procedures:

1. Standard I-B: Goals

The team report indicated that NCRA's overarching goals do not align with the mission statement nor do they directly reflect ACCET's Principles of Ethics. The broad goals presented were very general and related back to strategic planning and did not cover the areas of enrollment, education/training, student services, student outcomes, and finances.

The institution indicated in its response that the goals listed for the three-year plan are directly related

to the strategic plan. Each year the Executive Director and NCRA Board create a business plan to support the strategic plan. The two goals of increasing the demand for NCRA certification and increasing revenue through membership development inadvertently relate to NCRA's professional development and continuing education unit. Further, the institution stated that within these two goals, the NCRA Board will include continuing education as a goal to support ACCET's Principles of Ethics. A draft is to be presented to the board for approval at its August board meeting and added as an addendum to the May 2019 strategic plan. However, the institution did not provide current, overarching goals, as required by the standard.

Therefore, the institution must provide a narrative update on this issue, and needs to accelerate its Board approval process, including evidence of overarching goals aligned with ACCET Standard I-B. The goal statements need to be finalized and included with the response, indicating that they have been incorporated into institutional effectiveness measurements.

2. Standard I-C: Planning

The team report indicated that NCRA's plans do not encompass educational objectives such as curriculum review and revision, personnel training and development, student services, and student assessment.

The institution indicated in its response that its education and certification unit does not have specific and measurable objectives that document its educational objectives as required by the standard. Further, the institution indicated that a draft will be presented to the board at its August 2019 board meeting to be approved and added to the business plan for 2020 and each year thereafter, until a new strategic plan is completed. However, the institution did not provide evidence of planning documents including specific and measurable objectives, as required by this standard.

Therefore, the institution needs to accelerate their progress and provide a narrative update on this issue, including institutional planning documents containing specific and measurable objectives, along with corresponding operational strategies, projected time frames, required resources, and method(s) for subsequent evaluation, that are utilized to measure progress in achieving the established objectives.

3. Standard II-A: Governance

The team report indicated that the institution did not demonstrate that its governance structure, whether emanating from the Board of Directors or Council of the Academy of Professional Reporters (CAPR), had developed and maintained policies to ensure the effectiveness of the educational programs of NCRA or its compliance with ACCET accreditation requirements. This was exacerbated by turnover at the executive level, as noted under Standard II-C Human Resources Management, and evidenced by the number and severity of lapses in meeting accreditation standards cited throughout this report.

The institution indicated in its response that NCRA does have an identified and accountable

governance structure which delineates authority for the approval of institutional policies and responsibility for the overall direction and effectiveness of the association. The Executive Director (ED) and CEO reports to the NCRA Board for the overall operation and fiscal responsibility of the association. The association's senior directors report to the ED and are responsible for the day-to-day operations of their departments. This structure, when completely staffed, ensures the integrity and compliance of the association.

According to the institution's response, a process for developing, disseminating and revising policies and procedures is completed but not documented. The institution indicated that a document to clearly demonstrate the governance of the Board and CAPR's responsibility for educational programs will be developed and that a draft document will be presented to the NCRA Board in August 2019 for approval of the recommended process. The institution indicated the timeline for completion of this process is scheduled for December 2019, however, the institution did not provide documentation to evidence the governance of the Board and CAPR's responsibilities, as required by this standard.

Therefore, the institution needs to accelerate their progress and provide a narrative update in the interim report to include documentation to demonstrate that its governance structure, whether emanating from the Board of Directors or CAPR, has developed and maintained policies to ensure the effectiveness of the educational programs of NCRA and its compliance with ACCET accreditation requirements.

4. Standard II-B: Institutional Management

The team report indicated that the institution did not demonstrate that it maintained policies and procedures to guide the day-to-day operations as required by this standard. Inconsistent implementation and lack of written policies and procedures were systemic as evidenced by weaknesses in standards throughout the report, including:

- Standard I-B and I-C: Inadequate policy and procedures relative to the review and revision of goals and planning;
- Standard II-C: Inadequate policy and procedures relative to employee recruitment and performance evaluations;
- Standard III-B: Inadequate policy and procedures relative to refund calculations;
- Standard IV: Inadequate policy and procedures relative to curriculum review and revision;
- Standard V: Inadequate policy and procedures relative to instructional delivery;
- Standard VI: Inadequate policy and procedures relative to the supervision of instructional personnel including orientation and training;
- Standard VIII: Inadequate policy and procedures relative to performance measurements and student progress; and
- Standard IX: Inadequate policy and procedures relative to student satisfaction and program completion tracking.

The institution indicated in its response that NCRA is not a school and thus would not have the above

deficiencies in its Employee Manual. Further, the institution indicated that the policies related to program design, materials, implementation, grading, and remuneration will be developed and included in a separate manual that will govern continuing education. The institution indicated the timeline for completion of this process is scheduled for December 2019, however, the institution did not provide documentation demonstrating policies and procedures that guide the day-to-day operations of the institution nor a timeline regarding the development and implementation of policies relating to program design, materials, implementation, grading, and remuneration, as required by the standard.

It is noted that many ACCET accredited institutions are not “schools” per se, but nevertheless, are subject to be compliant with all ACCET standards. Therefore, the institution needs to accelerate their progress and provide evidence in the interim report of the development and implementation of written policies and procedures that govern the day-to-day operations, as well as a timeline for the development and implementation of policies relating to program design, materials, implementation, grading, and remuneration.

5. Standard II-C: Human Resource Management

The team report indicated that NCRA did not provide written policies and procedures for the recruitment of new personnel or policies governing staff professional development.

- NCRA did not provide the team with documentation of in-service training or professional development for staff or instructors.
- The team found inconsistencies in supporting documentation for ACCET Document 21- ACCET On-Site Visit-Personnel File/Qualifications Checklist as it relates to performance evaluation, professional development, and I-9s. Furthermore, files presented with ACCET Document 6 – Faculty/Administrative Personnel Form were incomplete. The following files were sampled with deficiencies were noted:

██████████
Hire date, 6/81
Last employee evaluation, 12/17
No in-service or professional development
Missing ACCET Doc 6
Missing I-9

██████████
Hire date, 6/15
Last employee evaluation, 9/17
No in-service or professional development
Missing ACCET Doc 6
Missing I-9

[REDACTED]
Hire date, 6/93
Last employee evaluation, 9/16
No in-service or professional development
Missing I-9

[REDACTED]
Hire date, 11/16
Last employee evaluation, none
No in-service or professional development
Missing ACCET Doc 6
Missing I-9

[REDACTED]
Hire date, 11/00
Last employee evaluation, 9/16
No in-service or professional development
Missing I-9

[REDACTED]
Hire date, 7/14
Last employee evaluation, 12/17
No in-service or professional development
Missing I-9

The institution indicated in its response only future plans to address issues in this standard. The CFO will work with Insperity to create an on-site policies and procedures document for NCRA recruitment. The Education & Certification unit will work with all NCRA committees responsible for education content for webinars, e-learning, and convention to create written policies and procedures for recruitment of presenters. Further, NCRA provides funding through HR and each department has funds for training, professional development, dues, and subscriptions. Staff working in the Education & Certification unit will be required to attend professional development. The institution indicated the timeline for completion of this process is scheduled for September 2019, however, the institution did not provide evidence of the implementation of policies and procedures guiding the recruitment of new personnel or policies governing staff professional development, as required by the standard.

Therefore, the institution needs to accelerate their progress and provide a narrative update in the interim report to include demonstration that policies and procedures are in place to ensure that qualified and capable personnel, at appropriate staffing levels, are effectively utilized and evaluated at least annually. These policies and procedures must address the recruitment, selection, hiring, orientation, supervision, evaluation, retention, training, and professional development of all personnel. Further, the records of those employees identified in this report must be documented as complete.

6. Standard III-B: Financial Procedures

The team report indicated that the NCRA refund policy for webinars and e-seminars specifies that a \$30.00 or \$35.00 processing fee applies to cancellations. This is not compliant with the requirements of ACCET Document 31 – Cancellation and Refund Policy, which requires that all monies be returned to cancellations and no-shows with the exception of a non-refundable application or registration fee not to exceed \$200.00, which must be clearly delineated in the tuition and refund policy. NCRA does not have policies and procedures governing documentation of student accounts and no additional general financial procedures were in evidence at the time of the visit. Further, the institution did not have written policies and procedures for refund processing. Finally, the institution was unable to verify payment on the Federal 941's from July 1, 2018 – December 31, 2018.

The institution indicated in its response that NCRA is not a school and thus does not have a tuition and refund policy. The institution indicated that it offers live and online webinars that require registration prior to the start of the webinar. The NCRA refund policy for webinars and e-seminars does not refer to tuition but the registration fee for the webinar. Since this is a registration fee and is less than \$200, this should meet the requirement. The registration fee and refund policy and fees are different for webinars, conventions, certifications, and skills tests. NCRA staff review all forms and online web pages to make sure that the refund policy is correct for each type of learning. NCRA will create policies and procedures governing documentation of student accounts and develop policies and procedures for refund processing. The timeline for completion of this process is September 2019, however, the institution did not provide evidence of the implementation of policies and procedures as required by this standard, nor evidence of payment verification on Federal 941's from July 1 – December 31, 2018.

Therefore, the institution needs to accelerate their progress and provide a narrative update, in the interim report, to include details of its webinar and e-seminar extension and cancellation request form and cancellation policy which includes a \$30 or \$35 processing fee, that is not listed as refundable or non-refundable. If this is a registration fee, note that it should follow ACCET Document 31 – Cancellation and Refund Policy. If a new policy is created based on the institution's report response, that policy should be updated in all appropriate materials, including but not limited to: 1) enrollment agreements, 2) manuals, 3) brochures, and 4) websites, and other materials and evidence of these updated materials, including any trainings and meeting minutes. Further, supporting documentation for the updated policies and procedures for student accounts and refund processing must be provided including training materials and meeting minutes. Finally, verification of payment on Federal 941's from July 1 – December 31, 2018 must be provided.

7. Standard IV-A: Educational Goals and Objectives

The team report indicated while NCRA's certifications are built around a job analysis or similar documents which lay out the expertise and competencies which the credential-holder must be able to demonstrate, the individual course offerings do not have written educational goals and objectives.

Further, the team report indicated that curricular content and learning experiences were not structured in a form appropriate for e-learning, as they did not support active learning and engage students as required by ACCET Document 3.E-Learning – Elearning Template.

The institution indicated in its response that NCRA will expand its conference submission guidelines to all new webinars, seminars, and e-learning to include measurable learning objectives. Where currently only a description is required for a proposal, presenters will need to develop learning objectives as well. NCRA will assist in the development of a format for e-learning that fosters active learning. This may include flash polls, pre-registration surveys, presenters picking on participants, or random touchpoints to check for understanding. Guidelines and templates will be created and presented to the Board for approval in August 2019, however, the institution did not demonstrate that its courses have appropriate educational goals and objectives, as required by this standard.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report to demonstrate that the institution’s courses have appropriate educational goals and objectives and that the curriculum content and learning experiences are preplanned and present a sound, systematic, and sequential educational methodology. Further, courses must include sufficient and appropriate knowledge and skill elements to meet the specific and measurable performance outcomes expected for the courses and programs.

8. Standard IV-B: Program/Instructional Materials

The team report indicated that course design and presentation are left up to untrained presenters. In addition, course materials are not vetted. Further, courses do not include syllabi or lesson plans, and there are no learning objectives or assessments.

The institution indicated in its response that consistent guidelines will be created so that all courses have the same types of materials, regardless of the delivery method (live or online). E-seminars already in the catalog will be reviewed for consistency and accessibility. Presenters will be asked to provide an assessment for the online learning. All new webinars, seminars, and e-learning will include a description of the course, an outline (syllabus), and measurable learning objectives. In addition, the certification team will work with the CLVS and CRC Committee to include an outline (syllabus) for the certification workshop. While the institution indicated it will create consistent guidelines and provided a list of future actions to demonstrate compliance with this standard by August 2019, the institution did not demonstrate that it implements effective written policies to continuously monitor and improve the curriculum and that its policies focus on a comprehensive review of the curriculum, as it relates to expected learning outcomes, as required by the standard.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report of the development and implementation of written policies to continuously monitor and improve the curriculum and that its policies focus on a comprehensive review of the curriculum, as it relates to expected learning outcomes.

9. Standard IV-D: Curriculum Review and Revision

The team report indicated that NCRA does not have written policies and procedures for the review and revision of its programs, nor any documentation to demonstrate that such review has taken place.

The institution indicated in its response that NCRA did conduct a review of its e-seminar library last spring to remove outdated material. However, the process was not documented. Further, the institution indicated that it will write policies and procedures for the review and revision of its educational offerings. Participant satisfaction surveys are conducted after in person meetings and online webinars or e-seminars. These satisfaction surveys will be included in the procedures to conduct seminar and speaker reviews and/or revisions. The institution indicated it will create policies and procedures for the review and revision of its education offerings by December 2019, however, the institution did not demonstrate that it has an appropriate curriculum review and revision process of its educational programs, as required by the standard.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report of the development and implementation of written policies and procedures for the curriculum review and revision process of its educational programs.

10. Standard V-A: Instructional Methods

The team report indicated NCRA has no policies or procedures for course design, and no policies for insuring that presenters are following any prescribed instructional methodology. Of the eight webinars viewed by the team, only one instructor actively engaged with students at the time of the recording. None of the webinars provided the student with content interaction, as required by ACCET Document 3.E-Learning.

The institution indicated in its response that most of the presenters who are conducting webinars and e-seminars for NCRA's convention or e-learning programs are unfamiliar with instructional methodologies. To meet this deficit, the education team will create written procedures for the creation of course design and instructional methodology for all delivery of continuing education. The timeline for completion of this process is December 2019, however, the institution did not demonstrate that written policies and procedures are in place to ensure that the curricula are followed and that there is consistency of application by all instructional staff, as required by the standard.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report of the development and implementation of written policies and procedures for the creation of course design and instructional methodology for all delivery of continuing education programs.

11. Standard V-B: Learning Resources, Equipment, and Supplies

The team report indicated that the NCRA LMS, InReach, does not facilitate student-to-content interactivity. Further, there was no indication that NCRA had examined how its LMS could support student engagement and facilitate the student's learning experience as required by ACCET Document 3.E-Learning.

The institution indicated in its response that it is currently exploring how their current LMS can support student interactivity and engagement and facilitate the student's experience. The timeline for completion of reviews, as indicated in the response, is scheduled for April and May 2019. However, adequate and appropriate learning resources for instructor and student use and for the effective delivery of the institution's education and training were not provided, as required by the standard.

Therefore, the institution must provide a narrative update on this issue, including documentation of course content interactivity and student engagement.

12. Standard VI-B: Supervision of Instruction

The team report indicated that NCRA does not have a policy or procedure for the supervision of CEU course presenters other than informal observation of the live sessions at the annual convention. Additionally, there is no policy for collecting or using the data from student surveys to evaluate or improve the quality of instruction.

The institution indicated in its response that NCRA will create policies and procedures for the supervision and evaluation of webinars or convention presenters. The policy will include how data will be collected and how it will be used to improve the quality of instruction. A draft of the document will be ready in August to beta test the presenters at the 2019 annual convention. However, the institution did not demonstrate that it has an appropriate policy and procedure for the supervision of CEU course presenters, as required by the standard

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report of the development and implementation of written policies and procedures for the supervision of instruction and for collecting and using the data from student surveys to evaluate and/or improve the quality of instruction.

13. Standard VI-C: Instructor Orientation and Training

The team report indicated that instructors who teach the live webinars (IDL), which are then recorded for e-learning delivery, are not oriented and trained in the effective use of the technology and methodology to ensure a high level of instructional quality and effective communications with students, as required by ACCET Documents 3.IDL and 3.E-Learning.

The institution indicated in its response that a workshop will be held in April 2019 for seminar presenters for the 2019 convention in August. The workshop will cover PPT development, best practices for presentations, and assessments. Policies and procedures for the training of

presenters will lead to a formalized orientation program. The timeline for the completion of the orientation program is scheduled for December 2019. However, the institution did not demonstrate that it has an appropriate policy and procedure for the instructor orientation and training, as required by the standard.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report of the development and implementation of written policies and procedures for the orientation and training of instructors.

14. Standard VIII-A: Performance Measurements

The team report indicated that NCRA's CEU courses (excluding the certification courses) do not include learning objectives or a method of assessing student learning.

The institution indicated in its response that for all new e-learning and convention seminars, learning objectives and assessments (formal or informal) will be included. The 2019 convention will include learning objectives and assessments. A training workshop is scheduled for April 2019. However, the institution did not demonstrate that it has learning objectives or a method of assessing student learning for CEU courses (excluding the certification courses), as required by the standard.

Therefore, the institution must provide evidence of the development and inclusion of learning objectives in its CEU courses and a narrative with supporting documentation of its method of assessing student learning.

15. Standard VIII-C: Student Progress

The team report indicated that CEU courses do not include assessments, therefore, students cannot track their academic progress. Further, the LMS does not have the capability of notifying students when they are close to the 30-day expiration date for courses.

The institution indicated in its response that for all new e-learning and convention seminars, learning objectives and assessments (formal or informal) will be included. The current LMS does not have the notification feature, but the vendor is aware of the need from other clients and is scoping out the work to add it. NCRA will be testing Moodle for some of its online learning and will use the notification feature. The participant will also have an assessment at the end of all new offerings for determining academic progress. The timeline for completion of this process is scheduled for July 2019; however, the institution did not demonstrate that student progress is documented consistently in accordance with institutionally established performance outcomes and is communicated to all students or that students are informed of their progress on a regular and timely basis.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report that demonstrates that student progress is documented consistently and is

communicated to all students or that students are informed of their progress on a regular

and timely basis.

16. Standard IX-A: Student Satisfaction

The team report indicated that the institution does not have written policies and procedures and/or mechanisms for tracking and analyzing student satisfaction. The institution did not demonstrate that it has a regular, ongoing process for reviewing, analyzing, and documenting student feedback.

The institution indicated in its response that to meet this deficit, the education team will create written policies and procedures to regularly assess, document, and validate student satisfaction for all new e-learning and convention seminars. The timeline for completion of this process is scheduled for December 2019, however, the institution did not demonstrate it regularly assess student satisfaction, as required by this standard.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report that demonstrates the development and implementation of written policies and procedures for the documentation of student satisfaction. This is to include the regular, ongoing process for reviewing, analyzing, and documenting student feedback.

17. Standard IX-C: Certification and Licensing

The team report indicated that NCRA did not have written policies or procedures to analyze and evaluate exam data over time, nor could it demonstrate how that data has been used to measure and improve the quality of the educational programs offered.

The institution indicated that NCRA will create written procedures on how the association analyzes and evaluates exam data. The process is currently completed with Pearson VUE twice a year. The institution provided two reports including the Registered Professional Reporter Exam Job Task Analysis Report October 21, 2017 – May 24, 2018 and the Registered Diplomate Reporter Exam Job Task Analysis Report, October 20, 2017 – May 24, 2018. The timeline for the completion of the development of written procedures is scheduled for August 2019, however, the institution did not demonstrate it analyzes and evaluates exam data over time, nor did it demonstrate how data has been used to measure and improve its educational programs.

Therefore, the institution needs to accelerate their progress and provide evidence in the interim report that demonstrates the development and implementation of written policies and procedures for analyzing and evaluating exam data and how it uses the data to measure and improve the quality of its educational programs.

A copy of this report, **including the attached interim report cover sheet**, must be mailed to interimreports@accet.org no later than **June 28, 2019**, in order for the institution's application for reaccreditation to be considered further at the Commission's August 2019 meeting.

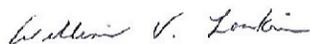
As a reminder, please be advised that late submission and receipt of documents and reports are subject to significant late fees in accordance with Commission policy. These fees are outlined in ACCET Document 10, which can be found at www.accet.org.

The institution is reminded that a Show Cause directive is a very serious action by the Commission. This status will be reviewed at the August 2019 Commission meeting. The NCRA team report response, in many instances, displayed a lack of urgency to the non-compliant issues cited and indicated completion dates well after the next Commission meeting. NCRA is advised that it is in its best interest to accelerate the accomplishment of these non-compliant issues. Further, while under a Show Cause directive, the institution is restricted from making any substantive changes including, but not limited to, new programs, major program revisions, new branch campuses or other new sites, or relocations out of the general market area.

Deferral of reaccreditation is not an adverse action and is explained in ACCET Document 11 – Policies and Practices of the Accrediting Commission, which is available on our website at www.accet.org. The deferral of a final decision is intended to allow for an opportunity to clarify and/or resolve the issues of concern cited herein, specifically focused on the demonstration of systematic and effective implementation of revised policies and procedures in practice over time. In accordance with Commission policy, no substantive changes including, but not limited to, new programs or major program revisions, new branch campuses or other new sites, and/or relocation out of the general market area, will be permitted during the term of the deferral period.

Your demonstrated capabilities and commitment in support of the institution's accredited status are essential to a favorable outcome in this process. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,



William V. Larkin, Ed.D.
Executive Director

WVL/mcd

Enclosures: Interim Report Cover Sheet

CC: Mr. Herman Bounds, Chief, Accreditation Division, US ED (aslrecordsmanager@ed.gov)
Ms. Valerie Lefor, Accreditation Division, US ED (valerie.lefor@ed.gov)
Ms. Sylvia Rosa Casanova, Director for Private and Out-of-State Postsecondary Educ., VA State Council of Higher Education for Virginia (sylviarosacasanova@schev.edu)