



May 25, 2005

*Re: Accrediting Commission Report
April 2005 Meeting*

Dear ACCET and Other Colleagues:

This letter and the accompanying enclosures are presented as an update on the actions undertaken by the ACCET Accrediting Commission at the recently completed meeting. 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 referenced herein, can be viewed and/or downloaded from the ACCET website (www.accet.org) along with this report under **Commission Report** and the **Documents and Forms** links. The following policy synopsis is offered for your reference, followed with some observations on current events and developments.

Finalized Policy Documents

- **Document 1 – Accreditation Plan Policies and Procedures**

The revisions to the document were subject to a call-for-comment from the field, initially reviewed at the December 2004 meeting, and further refined for final review and approval at the April 2005 meeting. The revisions, the first major re-write since 1990, serve to more accurately and clearly reflect current practice as it relates to ACCET's continued growth and development over that period of time. As previously communicated to the membership, these revisions do not include any changes to the eligibility criteria, which remain as previously approved.

- **Document 17 – Continuing Education Unit**

The revisions to the document formerly title The Validated CEU, were subject to a call-for-comment from the field. The revised document is greatly simplified and redefines the CEU as a unit of measure within the enhanced context of accreditation status.

- **Addendum to Document 27 – Guidelines for Filing Financial Reports - Alternative Financial Reporting Addendum**

The document was reviewed in accordance with the Commission's long-standing practice of reviewing and/or revising policy documents at minimum every five years. The document serves as an alternative financial reporting requirement for those institutions which are independently accredited but operated under a Licensor/Licensee agreement. Following its review, the

Commission found that the policy, applicable at present only to the Dale Carnegie organization, required minor edits with no substantive impact. Further, the required submission of the Annual Affidavit of an Institution Filing under Alternative Financial Reporting will now constitute pages 2 and 3 of the document.

- Document 50 FA – On-site Financial Aid Review Checklist/Guidelines

The document, used by on-site review teams during the evaluation of Title IV eligible institutions under Standard III-B, Financial Assistance/Scholarships, was reviewed in accordance with the Commission's five-year policy of review. Minor revisions, most specifically the addition of a LOA column on the file review chart on page 3, were included for clarification.

Current/Projected Events

- The ACCET Standards for Accreditation are, as previously reported, up for review this year and a 16 person task force made up of current and past Commissioners, institutional representatives and ACCET staff, to review and propose revisions. In addition, ACCET's web-based survey component of a systematic program for ongoing review (SPOR) has been reinitialized with targeted surveys sent to institutions, graduates and employers. The responses will be incorporated into the deliberations of the task force at the special July 14-15 meeting. If all goes according to plan thereafter, the Commission will review, revise and approve a proposed draft to be sent out to the ACCET membership for a call-for-comment and request for approval following the August meeting. Depending on the results, subsequent revision and/or final approval could be sought at the membership meeting at the opening of the annual conference (October 26-28) in San Francisco or further reviewed at the December Commission meeting.
- A number of recent inquiries to one of our colleague agencies requesting approval of externship agreements, purportedly directed by a regional office of the USDE, led us to set up a meeting with FSA representatives at the Department. Specifically, an apparent interpretation was made that required externships of 25% or greater length of a program to be treated as contracting out training and, therefore requiring agency approval. We believe that it is a misinterpretation of the regulations (34CFR 668.5) and asked FSA to investigate and clarify the application. They indicated a timely review would be undertaken and we will keep you apprised.
- Given the rising use of adjunct instructors, approximately 40% of the instructional load in U.S. higher education by one count, who are typically classified as independent contractors

(1099s), a recent case brought to our attention is offered as a cautionary note. The case involved a termination of an instructor who claimed he was really an employee, not an independent contractor and, while not as yet resolved, the outcome could be influenced by state and/or federal (IRS) agencies and will be costly defending. You may find it beneficial to review the IRS tests for “independence” in conjunction with your written policies and procedures for overseeing adjunct instructors.

- The 2005 edition of the CRNAA (Council of Recognized National Accrediting Agencies) *Directory of Higher Education Officials* is available at www.crnaa.org. This is the most current listing of federal and state agency officials as well as the six accrediting agencies that constitute the CRNAA.
- As many of you have experienced by now, ACCET’s use of the web for processing various activities continues to expand and, we trust, improve access and convenience. Specifically the Annual Report (Document 12) and Completion and Placement Statistics (Document 28.1), the latter for vocational institutions only, reports are web-based. In addition, almost all of our forms can be accessed at our website in fillable versions to facilitate completion. We receive regular praise on the ACCET website and welcome your feedback on enhancements to be considered.
- We have been engaged in increasingly frequent discussions on the development and/or display of “best practice” policies and procedures that would serve as potential models to emulate and/or guides to adapt. We frequently receive requests for examples, i.e. a sound business plan format, attendance/tardiness policy, satisfactory progress policy and placement monitoring and tracking procedures. These will be posted at the website as we develop them.

Finally, with an eye toward the horizon, two important developments are highlighted. For the present we have created a second Associate Executive Director-Systems position, filled by Sheila Sauls-White, who has made many contributions, including dramatic improvements to the financial review process and our website capabilities; which, in turn, complements the depth of knowledge and experience contributed by our dedicated Associate Executive Director-Accreditation, Donna Hutchison. For the future, our 2005 Annual Conference in San Francisco in late October is shaping up to be another in an unbroken series of informative, inspiring and enjoyable events. There are many affirmative signs of progress to report, but you are just going to have to come to the conference to get all the details, or give us a call anytime to keep each other abreast of the important work we share in this partnership for quality.

Sincerely,

Roger J. Williams

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Executive Director