



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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May 28, 2010

*Re: Accrediting Commission Report
April 2010 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 the April 2010 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, previously posted and referenced herein, can be viewed and/or downloaded from the ACCET website (www.accet.org). This report is also posted on the website under Commission Reports.

Provided below is a synopsis of the Commission's actions on ACCET policies at the April 2010 meeting to include: (1) a call for comment by the membership and (2) finalized document approvals. It is noted, as a reminder, that the Commission's Standards and Policy Review Committee (SPRC) undertakes a review of every policy that has not been subject to review for a period of five years.

Call for Comment Solicited

(The draft documents and call for comment form are available on ACCET's website)

Document 4 – Application for Accreditation

Consistent with Document 27 Addendum – Guidelines for Filing Financial Reports: Alternative Financial Reporting, it is proposed that financial statements for the two most recent fiscal years be submitted by institutions eligible for Alternative Financial Reporting (e.g. Dale Carnegie Franchises).

ACCET Document 2 – Standards for Accreditation:

As part of the five-year review process, an initial review of the current ACCET standards was conducted by SPRC at the December 2009 meeting, based upon a thorough analysis of the results of an ACCET Standards Review Survey. This extensive survey indicated that minor modifications to the standards, but not substantial revisions are warranted. Following the December meeting, SPRC forwarded the proposed revisions to the ACCET Standards for review by: (1) an Ad Hoc Advisory Committee, (2) Task Force, and (3) ACCET Staff. Further changes were proposed for consideration by SPRC and the full Commission at the April 2010 meeting.

Following the current “call-for-comment”, proposed changes to ACCET Standards will be subject to a final review by the Commission at its upcoming August meeting. A proposed final version of the standards will be sent to the ACCET membership for approval by ballot and/or in-person at the November 1, 2010 Business Meeting in Savannah, Georgia during the 2010 annual conference. Proposed changes to the ACCET Standards include:

- Clarify that written policies and procedures are required under Standards II-C – Personnel Management; V-A Instructional Methods; VI-C Instructor Orientation and Training; and VII-B Enrollment;
- Make minor edits to Standards II-B Goals; II-D Records; II-F Professional Relationships; III-A Stability; III-B Financial Procedures; IV-D Curriculum Review/Revision; and VIII-C Participant Satisfaction.
- Modify the following standards, as follows:

I-A	<u>Mission</u> : Specify that an institution’s mission must be: (1) clearly stated and made public and (2) consistent with the Principles of Ethics for ACCET Accredited Institution.
II-C	<u>Planning</u> : Clarify what elements must be contained within an institution’s one-year and longer-range plans.
III-C	<u>Financial Assistance/Scholarships</u> : Clarify that: (a) all student financial assistance must be awarded in a fair and equitable manner and (b) policies and procedures governing financial assistance/scholarship must be written.
V-B	<u>Externships/Internships</u> : Consolidate externship/internship under this single standard.
V-C	<u>Equipment/Supplies</u> : Add reference to learning resources in the heading and body of this standard.
V-D	<u>Facilities</u> : Simplify and clarify the language.
VI-A	<u>Qualification of Instructional Personnel</u> : Clarify that instructional personnel meet all relevant federal, state, local, and/or industry-specific requirements.
VI-B	<u>Supervision of Instruction</u> : Clarify that regular classroom observation be documented and effectively utilized to enhance the quality of instruction.
VII-C	<u>Transfer of Credit</u> : Clarify that policies and procedures must address the transfer of credit to and from the institution.
VII-D	<u>Student Services</u> : Itemize possible student services to be provided students.
VIII-A	<u>Student Progress</u> : Clarify that: (a) an institutions must effectively monitor, assess, and record student progress utilizing the sound assessment system required under Standard IV-C <u>Performance Measures</u> , and (b) institution must publish clear requirements for satisfactory progress, utilize sound written policies and procedures to determine students’ compliance with these requirements, and document the results.
VIII-B	<u>Attendance</u> : Clarify that: (a) an institution must establish and implement written policies and procedures for monitoring and documenting attendance and (b) attendance policies must be effective in ensuring that student participation and preparation are consistent with expected program performance outcomes.

Documents 3.1, 3.2, 3.2/3ESL, and 3.3 – Guidelines for Preparing an Electronic Analytic Self-Evaluation Report (eASER)

Changes are proposed, including additions, deletions, and modifications to the questions/statements to be addressed under each ACCET standard in the following versions of Document 3:

- ACCET Document 3.1 (Vocational Institutions)
- ACCET Document 3.2/3 ESL (ESL/Avocational Institutions)
- ACCET Document 3.2 (Avocational Institutions)
- ACCET Document 3.3 (Dale Carnegie Institutions)

Because of the complexity of the documents, track change edits are not provided; rather a side-by-side comparison is provided of “Proposed Text” (left column) and “Existing Text” (right column) for the questions/statements under each ACCET standard.

Document 13 – Bylaws

The proposed change is to allow a Commissioner to serve up to two additional years, granted in one-year increments, if such extensions are determined by the Commission to be necessary to the effectiveness, structure, or continuity of the Commission, whereas currently, a single one-year extension may be granted. This change would provide some much needed flexibility in keeping terms sufficiently staggered such that the value of experience developed over time is maintained at a high level with minimal disruption such as could occur in 2011 with five of our eleven Commissioners completing their final term.

Finalized Document Approvals

The following revised documents were approved by the Commission. These approvals were granted after a careful review and consideration of the prior call-for-comment solicitation or in such cases when the Commission determines that only the most minor changes were made. In the case of Document 11, the revision was to ensure compliance with the provisions of the Higher Education Opportunity Act (HEOA) and/or the applicable regulations.

Document 11 – Policies and Practices of the Accrediting Commission

Changes were made to be consistent with regulations effective July 1, 2010, to implement the (HEOA). As a result the Appeals Panel will now include a representative from the public. Further, language was added to state in policy, what has been a longstanding practice here at ACCET, that appropriate orientation and training be provided for panel members to ensure a fair and impartial review of an institution’s appeal. While the Commission by necessity approved the revised document for immediate implementation, it directed that the document go out for review and comment as a courtesy to the membership.

Document 16 – Transfer of Credit

Changes were made to: (1) require that a transfer of credit policy identify any limits on how recently coursework must have been completed; (2) require that any institution making statements relative to the acceptance of its coursework for credit by another institution have documented evidence to support such statements; and (3) allow an institution to accept credit for transfer from an institution that is not accredited by an agency recognized by the U.S. Department of Education, provided the institution can demonstrate a compelling reason to the Commission, such as that the institution’s programs are well-aligned with and supported by an established, recognized industry training affiliated agency not included in the USDE listing.

Document 28 – Completion and Placement Policy

Changes were made including: (1) clarifying the language regarding the submission of separate Document 28.1s – Completion and Placement Statistics for program variations; (2) consistently formatting the section headings, (3) revising the waiver explanation to delete “*ineligible completions*”, as this terminology is not used on Doc. 28.1; and (4) making the following revisions to the “*Self-Employment*” section: (a) reformatting the description of multiple student attestations and (b) waiving the first acknowledgement regarding self-employment to be signed at the time of a student’s enrollment in a program for which self-employment is not a common vocational objective.

Document 29 – Catalog Checklist

Changes were made to the Catalog Checklist to: (1) refine the stated rationale; (2) add the institution’s website; (3) itemize the items to be included under admissions requirement; (4) emphasize the importance of the inclusion of all required elements in the institution’s policies on transfer of credit and leaves of absence; (5) indicate that the cancellation and refund policy must include the terms and conditions regarding cancellations, withdrawals, and terminations; (6) include a copyright infringement policy; and (7) require institutions that charge and retain tuition by payment periods or periods of obligations (e.g. semester, terms, or modules) to clearly and fully disclose to students: (a) the payment periods or periods of obligation for the program; (b) the schedule of payment, based upon these payment/obligation periods; and (c) the impact of these payment/obligation periods on the institution’s cancellation and refund policy.

Document 31 ESL – Cancellation and Refund Policy (applicable to IEPs enrolling international students)

Changes were made to: (1) increase to \$500 the identified non-refundable charges, including any application/registration fee, courier fees, and travel cancellation insurance an institution may retain, if an applicant cancels prior to the start of scheduled classes; (2) more clearly specify that the cancellation and refund policy/practices must separately address cancellations, withdrawals, and terminations; (3) insert additional headings in the document, for purposes of clarity; and (4) allow an institution to retain the following tuition for students who enter the United States on the institution’s I-20 Visa, but never start training at that institution: (a) retain tuition for the first four weeks of the first term/session for students enrolled in programs of less than 12 weeks; and

(b) retain tuition for the first six weeks of the first term/session for students enrolled in programs of 12 weeks or more.

Document 32 –Teach-Out/Closure Policy

In accordance with the regulations implementing the HEOA the following revisions were made: (1) itemization of additional events that will necessitate the submission of a teach-out plan; (2) notification to another recognized accrediting agency, if a teach-out plan includes a program that is accredited by that agency; (3) additional statements regarding the criteria that ACCET will use to evaluate teach-out agreements, consistent with federal regulations; and (4) the addition of a section on “*Closure without a Teach/Out Plan/Agreement*”.

Document 34 – Policy on Contracting Out For Educational Delivery

Changes were made to: (1) identify additional provisions to include in an agreement between the institution and a third party contractor; and (2) add a section pertaining to ACCET institutions that are contracted by other educational institutions or other organizations to deliver training.

Document 48 – Policy on Adverse Actions by Other Agencies

In accordance with the regulations implementing the HEOA, changes were to: (1) revise language throughout the document to be consistent with the regulations; (2) clearly list as bulleted items examples of adverse actions or other restrictive actions by federal, state, or accrediting agencies; and (3) add language regarding the process for notifying and sharing information relative to institutions that are the subject of adverse actions.

Other Business

Website/Database Upgrade

Our progress in the ongoing development of the database is now past the halfway point and the staff is actively engaged in weekly teleconference meetings with the Cyanna team. All of the major processes will be web-based and facilitated with ready access by our accredited institutions to the spectrum of data elements pertinent to your operation as well as far more friendly tools for submitting various applications and, of course, the eASER. In combination with a website redesign to offer a seamless portal for interaction and communications, we expect to accomplish both an improved information channel and a fresh look for the membership and agency to the world, minus that shop-worn photo of our rapidly aging Executive Director. October 2010 remains the expected roll-out date.

Annual Conference

The 2010 conference is being scheduled for November 1-3, at the Westin hotel in Savannah, Georgia, for which program and registration information is now posted at our website. This year’s theme, “A Partnership for Quality: Mapping Institutional Effectiveness” will undoubtedly offer some thought-provoking sessions to stimulate ideas and approaches that keep your

institutions on the leading edge as we seem to be entering another of those cyclical periods of uncertainty in both the public marketplace and the regulatory agencies. As an early heads-up, election day is November 2nd, and for those of us who have never used an absentee ballot, like myself, this is an early reminder to check out the process in your state. A quick Google of the state and absentee ballot shows how easy it is, as I just did in the past five minutes. Incidentally, the Accreditation Workshop and Team Evaluator Workshop will be that weekend immediately preceding the conference.

California Licensure By Means of Accreditation

The AB48 Bill and the initial (Emergency) regulations published in January were the opening phase of the newly created and minimally staffed/funded BPPE that has been trying to interpret this statute as we all run alongside hoping we understand it well enough to be in compliance as until the current proposed rulemaking process is completed. While it may appear and feel like a battle between the forces of good and evil sometimes, the Bill, the regulations, and the staff have, by any reasoned account, made progress toward practicality. Since the regulations allow an automatic three-year extension of initial licensure under the BPPE, until December 31, 2013, for those institutions approved when the BPPVE went dark on June 30, 2007, there has been no apparent rush of requests to ACCET for the certification letter required by the state to initialize licensure by means of accreditation. We have processed approximately 10 to date, for which the ownership, locations, and programs are incorporated into a letter for the institution to submit as an attachment to its application to BPPE. Four of the national accreditors met with BPPE staff at the agency, back in mid-April just prior to the CAPPS legislative conference, in an open exchange of interpretations, proposals and frustrations expressed by both sides as we all try to come to grips with the new model available to schools accredited by USDE recognized agencies. There are many details to be worked out and it will undoubtedly strain the patience and pockets of some while the miniscule staff regulatory requirements remain a work in progress for the immediate future.

USDE Rulemaking/Oversight

There has been a good deal of attention paid in the past few months relative to issues such as incentive compensation, defaults, and gainful employment that are being scrutinized by the USDE in a somewhat charged atmosphere of news reports, OIG investigations, and high level Department criticism of the for-profit sector specifically and accrediting agencies in general. I feel like I have seen this movie before and it doesn't end well. Somewhere between short-cuts and short memories there are scandals and investigations brewing; but I remain largely confident and certainly hopeful that ACCET accredited members have neither been given nor taken the option on the former and not forgotten the painful lessons in the latter. I thank you all for your continued commitment to the high standards reflected in your ongoing support of the demanding work represented in accredited status. Best Regards.

Sincerely,

Roger J. Williams
Executive Director