APRIL 2011 COMMISSION MEETING REPORT

May 17, 2011

Re: Accrediting Commission Report
April 2011 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 2011 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), under Commission reports.

Provided below is a synopsis of the Commission's actions on ACCET policies at the April 2011 meeting to include: (1) solicitation of 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 specific policies that have been identified for consideration of revision to address and include contemporary good practices, in addition to a standard review of any policy that has not been subject to review for a period of five years. While those policies finalized by the Commission are technically effective upon notification and must be timely initialized, we recognize that full implementation in some cases (catalog revisions) may require some limited additional time and in others (USDE regulatory deadlines) must be demonstrated in accordance with statutory and/or regulatory compliance timelines.

Call for Comment Solicited

The draft documents responsive to this call for comment are available on ACCET's website.

1. **Document 11 – Policies and Practices of the Accrediting Commission:**

   Following a comprehensive review, the following changes are proposed: (a) eliminate reference to "electronic" when referring to the Analytic Self-Evaluation Report (ASER), which are all submitted electronically; (b) clarify the policy on potential conflicts of interest relative to Commissioner abstentions and recusals during deliberations; (c) identify that the Commission may require a new and/or revised ASER from an initial applicant when a follow-up on-site visit is directed; (d) clarify that grants of reaccreditation may be for one, three, or five years; (e) reorganize the section entitled "*Applicants for Renewal of*

Accreditation" by moving the subsection on "*Show Cause*" to a new section entitled "*Other Commission Actions*", since a show cause directive may or may not be concurrent with a reaccreditation evaluation; (f) for clarity revise the language relative to withdrawal of accreditation; (g) more clearly specify the criteria for selecting the independent three-member Appeals Panel; (h) indicate that counsel may be present to provide procedural and legal advice to the Appeals Panel; (i) clarify the language regarding ownership changes under the section entitled "*Substantive Changes*"; (j) create a new section entitled "*Other Commission Actions*" that separately specifies: (i) the new subsection on "*Restriction and Reporting*"; (ii) the subsection on "*Show Cause*" that includes the withdrawal of program approval as an action that may be taken by the Commission following the review of the institution's response to a show cause directive; and (iii) the subsection on "*Debarment*".

2. **Document 13 – Bylaws:**

Following a comprehensive review, the following changes are proposed: (a) state that ACCET is a charitable corporation; (b) eliminate reference to the corporation being organized for scientific purposes; (c) clarify that institutions must comply with ACCET standards, policies, and procedures; (d) move the description of what happens if an institution defaults on its payment of fees from the section entitled "*Termination of Membership*" to a new section (Section 15.2) entitled "*Failure to Pay Fees*"; (e) revise the section on "*Number of Commissioners, Tenure, and Qualifications*" relative to the number of Public Commissioners and the method by which the size of the Commission may be revised; (f) clarify the section on "*Vacancies and Appointments*"; (g) identify that the Chair of the Commission is the Chair of the Executive Committee; and (h) specify that the Appeals Panel is independent.

Document 49 – Policy and Procedure for Processing Complaints Initiated Against ACCET Accredited Institutions:

As part of the five-year review process, the following changes are proposed: (a) require institutions to provide the address and phone number of ACCET, without students having to request the information, consistent with Document 49.1; (b) revise the section regarding the maximum time period from an alleged incident to the filing of a complaint; (c) specifically identify the criteria for determining whether a complaint is with or without urgency; and (d) reduce the maximum time for processing complaints to specify a consistent 14-day interval for each phase of the process.

Finalized Document Approvals

The following new and revised documents were approved by the Commission. These approvals were granted after a careful review and consideration of the prior call-for-comment response. In some instances, the Commission approved documents for immediate implementation to be in compliance with the new federal Program Integrity regulations, which become effective July 1, 2011, with the understanding that the Commission will remain open to further consider of any comments regarding these documents at its August 2011 meeting.

1. **Document 3.1 – <u>Analytic Self-Evaluation Report (ASER)</u>:**

   Modifications were made to require Title IV institutions to provide additional items under Standard III-C, <u>Financial Assistance/Scholarships</u>, including the institution's Eligibility Certification Approval Report (ECAR), and if applicable, their policies and procedures for determining credit hours awarded for its course/programs and the definition(s) of the clock hour-to-credit hour conversion utilized for academic purposes and, separately as required by the USDE, for financial aid purposes. For each program measured in credit hours for federal financial aid purposes, the institution also must provide the on-site review team information pertaining to work outside of class for <u>one course</u> in the program, to include: (a) hours of work outside of class, (b) syllabi and curricular material documenting work required outside of class, and (c) documented evidence that work outside of class is evaluated and appropriately weighted in determining final course/module grades. At the time of the on-site examination visit, the team will expand the sample review of syllabi and curricular materials to include additional courses within each program. (Refer to <u>Preparation Checklist for ACCET On-Site Examination Visit.</u>)

2. **<u>Preparation Checklist for ACCET On-Site Examination Visit</u>:**

   Modifications were made to require Title IV institutions to provide additional items to the on-site team, including their ECAR and, if applicable, their policies and procedures for determining credit hours awarded for its courses/programs and the definition(s) of the clock hour-to-credit hour conversion utilized for academic purposes and, separately as required by the USDE, for financial aid purposes. For each program measured in credit hours for federal financial aid purposes, the institution also must provide information pertaining to work outside of class for a <u>minimum of four courses</u> in each program to include: (a) hours of work outside of class, (b) syllabi and curricular material documenting work outside of class, and (c) documented evidence that work outside of class is evaluated and appropriately weighted in determining final course/module grades. Beginning in 2012, institutions will be required to provide on-site teams with the documented evidence of work outside of class for <u>all courses</u> in each program.

3. **Document 15 – <u>Credit Hour and Clock Hour Policy</u>:**

   Based on the long-established policies contained in Document 25 – <u>Policy for a New or Revised Program/Course,</u> this new document was developed to establish a policy relevant to all programs (not just new or revised programs). The policy states that ACCET requires the Carnegie unit to be utilized by institutions measuring their programs in credit hours for academic purposes. Additionally, for institutions utilizing a credit-hour measurement, ACCET requires work outside of class such as homework to be documented in the curricular materials and syllabi, including an approximation of the time required for the student to complete the assignments. Further, the evaluation of homework and/or work outside of class must be identified as a grading criterion and appropriately weighted in determining the final grade for a course or module.

The policy defines ACCET's role in the review and evaluation of assigned credit hours by institutions consistent with new federal regulations for financial aid purposes. In its review and evaluation, ACCET will: (a) make a reasonable determination of whether the institution's assignment of credit hours conforms to "commonly accepted practice in higher education"; (b) make use of sampling or other methods of evaluation, as warranted; (c) take such actions that it deems appropriate to address any deficiencies; and (d) promptly notify the U.S. Secretary of Education, if systemic noncompliance with ACCET policies or significant noncompliance is found regarding one or more programs at the institution

4. **Document 17 – Continuing Education Units:**

As part of the five-year document review process, a minor change was made to update the certification that ACCET possesses to correctly state the ISO 9001:2008 Certification.

5. **Document 18 – Satisfactory Academic Progress Policy:**

Modifications were made to be consistent with the Program Integrity regulations and to clarify that: (a) Evaluation periods or increments <u>must</u> align with payment periods, for institutions participating in federal Title IV financial aid programs; (b) for a program measured in credit hours, the qualitative standard must be expressed in credit hours; (c) each evaluation must include an assessment of the qualitative (e.g. grade point average) and quantitative measure of the student's rate of progress (PACE); (d) no single warning period may exceed a payment period; (e) the academic plan developed with the student must ensure that the student is able to meet the institution's SAP standards by a specific point in time and may require more frequent SAP evaluations; (f) the institution's policy on probations, if applicable, specify the terms of the probation; and (g) Federal Title IV regulations require that an institution count transfer hours which are accepted toward completion of a student's program as both hours attempted and hours completed (earned).

6. **Document 19 – Instructor Evaluation:**

As part of the five year document review process, minor changes were made to the order of the items to be evaluated during classroom observations.

7. **Document 20 – Review of Instructional Materials/Methods:**

As part of the five year document review process, minor changes were made to the order of the items to be evaluated.

8. **Document 25 – Policy for Approval of a New or Revised Program/Course**:

Modifications were made to: (a) establish a limit on the number of out-of-scope programs that may be approved initially and require documented evidence of the successful outcomes of graduates (e.g. above-benchmark completion and placement rates) of the initial offering of such programs, before additional programs in the new field may be submitted and/or approved; and (b) clarify that for institutions utilizing a credit-hour measurement, ACCET

requires work outside of class such as homework to be documented in the curricular materials and syllabi, including an approximation of the time required for the student to complete the assignments. Further, the evaluation of homework and/or work outside of class must be identified as a grading criterion and appropriately weighted in determining the final grade for a course or module. An additional change was made to more clearly describe the process for approving new programs and substantial modifications to existing programs.

Additionally, changes were made to reorder items under the section entitled "*What requires a partial application?*" and create a new section "*What requires a different program application?*" to include new program applications (Document 25.9 – Application for Review of Clock Hour-to-Credit Hour Conversion Based on Work Outside of Class (e.g. Homework) and Document 25.8 – Application for Clock Hour-to-Credit Hour Conversion). Other modifications were made to reference the new Documents 25.6a and 25.6b in place of Document 25.6 – Subject Hour Breakdown and to require institutions to notify ACCET of short courses to allow them to be included on Document 12b – Annual Report and Enrollment Statistics.

9. **Document 25.IDL – Application for Interactive Distance Learning Program**

Modifications were made to items # 10 and # 11 to replace Document 25.6 – Subject Hour Breakdown with Document 25.6a – Clock Hour Breakdown by Program and Course or Document 25.6b – Clock Hour and Credit Hour Breakdown by Program and Course. For a credit-hour program, the institution also must provide information pertaining to work outside of class for all courses to include: (a) hours of work outside of class, (b) syllabi and curricular material documenting work outside of class, and (c) documented evidence that work outside of class is evaluated and appropriately weighted in determining final course/module grades.

10. **Document 25.OAD – Application for Occupational Associate Degree Program**

Modifications were made to items # 10 and # 11, to replace Document 25.6 – Subject Hour Breakdown with Document 25.6a – Clock Hour Breakdown by Program and Course or Document 25.6b – Clock Hour and Credit Hour Breakdown by Program and Course. For a credit-hour program, the institution also must provide information pertaining to work outside of class for all courses to include: (a) hours of work outside of class, (b) syllabi and curricular material documenting work outside of class, and (c) documented evidence that work outside of class is evaluated and appropriately weighted in determining final course/module grades.

11. **Document 25.2 – Checklist for Application for New or Revised Program/Course:**

Modifications were made to items # 10 and # 11, to replace Document 25.6 – Subject Hour Breakdown with Document 25.6a – Clock Hour Breakdown by Program and Course or Document 25.6b – Clock Hour and Credit Hour Breakdown by Program and Course. For a credit-hour program, the institution also must provide information pertaining to work outside of class for all courses to include: (a) hours of work outside of class, (b) syllabi and curricular material documenting work outside of class, and (c) documented evidence that work outside of class is evaluated and appropriately weighted in determining final course/module grades.

12. Document 25.6 – <u>Subject Hour Breakdown</u>:

Modifications were made to replace this document with two new documents: Document 25.6a – <u>Clock Hour Breakdown – By Program and Course</u> and Document 25.6b – <u>Clock Hour and Credit Hour Breakdown – By Program and Course.</u>

13. Document 25.6a – <u>Clock Hour Breakdown – By Program and Course</u>:

This new document is to be completed for a program measured in clock hours.

14. Document 25.6b – <u>Clock Hour and Credit Hour Breakdown – By Program and Course</u>:

This new document is to be completed for a program measured in credit hours.

15. <u>Document 25.8 – Application for Clock Hour-to-Credit Hour Conversion</u>:

This new program application was developed for an institution to seek ACCET approval to measure its program in credit hours. The application requests the institution's: ECAR, credit hour policy, and catalog program descriptions. The institution also must provide information pertaining to work outside of class for <u>all courses</u> in the program to include: (a) hours of work outside of class, (b) syllabi and curricular material documenting work outside of class, and (c) documented evidence that work outside of class is evaluated and appropriately weighted in determining final course/module grades.

16. Document 25.9 – <u>Application for Review of Clock Hour-to-Credit Hour Conversion Based on Work Outside of Class (e.g. Homework)</u>:

This new program application was developed for an institution to seek a review by ACCET of its credit hour policies and assignment of credit in order for the instititution to utilize the existing federal clock hour-to-credit hour conversion (30:1 semester credit or 20:1 quarter credit), based on documented evidence of work outside of class. The application requests the institution's: ECAR, credit hour policy, and catalog program descriptions. The institution also must provide information pertaining to work outside of class for a <u>minimum of four courses</u> in the program to include: (a) hours of work outside of class, (b) syllabi and curricular material documenting work outside of class, and (c) documented evidence that work outside of class is evaluated and appropriately weighted in determining final course/module grades. Upon review, ACCET may request documentation of work outside of class for <u>additional courses</u>.

17. Document 29 – <u>Catalog Checklist/Guidelines</u>:

Modifications were made to require more detailed clock hour and credit hour information in the catalog to include: (a) a breakdown of the clock hours and, if applicable, the credit hours for lecture, lab, and externship/internship in each program; (b) course descriptions identifying the breakdown of clock hours and, if applicable, the credit hours for lecture, lab, and externship/internship; and (c) if applicable, the institution's policies and procedures for

determining credit hours awarded for its courses and programs and the definition(s) of the clock hour-to-credit hour conversion utilized for academic purposes and financial aid purposes.

18. **Document 30 – Policies for Recruiting, Advertising, and Promotional Practices:**

Changes were made in response to recently promulgated federal regulations regarding misrepresentations and misleading statements to prospective students, students, and members of the public, accrediting, federal, and state agencies. The changes provide more specific guidance on: (a) various prohibited forms of misrepresentation and (b) the institution's responsibility to ensure a clear and accurate representation of applicable accreditation (institutional, programmatic, and specialized).

19. **Guidelines for Developing Business Plans:**

This new document is designed to assist institutions in developing business plans in accordance with ACCET Standard I-C, Planning. The document identifies: (a) the key components of the written one-year and longer-range plans; (b) what a business plan is and is not; (c) the format of the plan; and (d) the importance of the objectives and strategies identified in the plans being specific, measureable, achievable (with resources identified), time-based, and periodically evaluated and revised. By way of example, the guidelines include a sample business objective (establishing a new branch campus by 2012) from a one-year business plan.

These policy and procedural issues are largely responsive to major U.S. Department of Education regulatory revisions promulgated as Program Integrity regulations last October and taking effect July 1, 2011. ACCET sent out an earlier mailing on many of these issues on April 21st and followed up with a series of three webinars, with the webinar recording and Power Point Presentations posted on our website for your reference. Some of those regulatory requirements are widely seen to be particularly challenging. That said, the laws and regulations impacting your institutions and this accrediting agency demand a compellingly good faith effort at compliance, and the Commission has approached that task with extensive research, discussion, and deliberation to guide us all in meeting our obligations in as sound a manner as possible.

Sincerely,

ELECTRONIC SIGNATURE

Roger J. Williams
Executive Director