



January 31, 2008

*Re: Accrediting Commission Report
December 2007 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 December 2007 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 at the website under Commission Reports.

Provided below is a synopsis of the Commission's final actions taken on ACCET policies at the December 2007 meeting, following a careful review of all comments received as a result of a call-for-comment solicitation sent out after the August 2007 meeting. 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.

Finalized Document Approvals

- **Document 23 – Admission Credentials/Ability to Benefit**

The five-year review process resulted in various revisions to this policy document over an extended series of Commission meetings and call-for-comments due to the absence of clear guidance on the admissions beyond the limited ability-to-benefit issue. The current policy includes the basic requirements that all vocational institutions: (1) develop, publish, and fairly administer their admissions standards; (2) determine that all applicants admitted meet such standards and are capable of benefiting from the training offered; and (3) secure documentation that each applicant meets all admissions requirements.

- **Document 27 – Guidelines for Filing Financial Reports**

At the request of the Financial Review Committee, to ensure timely financial information for its review, the document was revised to require an institution to submit updated financials with its application for reaccreditation, if more than six

months have passed since the end date of the institution's fiscal year, to include: an attested, internally generated statement for the fiscal year-to-date, current to within one month of the application due date.

- **Document 27.1 – Special Requirements for Filing Financial Reports**

This document was revised, compatible with the revision Document 27 referenced herein, relative to the requirement for submission of updated financial information with applications for reaccreditation, if more than six months have passed since the end date of the institution's fiscal year.

- **Document 45 – Steps to Follow for Reaccreditation**

The following clarifications, both to updated terminology and consistent with good practices the Commission considers essential to an institution's preparations for reaccreditation, are incorporated into revisions to this policy document: (1) reference to an electronic Analytic Self-Evaluation Report (eASER) and electronic Branch Analytic Self-Evaluation Report (eBASER); (2) the requirement that an institution attend an Accreditation Workshop at least four months prior to the institution's eASER due date; (3) the imposition of a late fee, if an application or eASER/eBASER is late; and (4) notice that an application or eASER /eBASER that is more than 30 days late will be considered to be a self-executed withdrawal of accreditation.

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

The five-year review process resulted in no substantive revisions to the document and only minor edits for purposes of clarity.

- **Document 25 – OAD – Application for Occupational Associates Degree Program**

The five-year review process resulted in no substantive revisions to the document and only minor edits for purposes of clarity. There was some extended discussion as to whether to require a needs analysis to substantiate the value-added benefit to students at institutions seeking to offer an Occupational Associates Degree Program upgrade to their vocational certificate programs. However, the consensus view was that the inherent trade-offs in an open marketplace combined with the additional financial, facility, staffing, scheduling, and outcomes performance factors that must guide institutions through such complicated decisions, remains the most practical approach to addressing the issue.

- **Document 37 – Change of Name Application**

The five-year review process resulted in no substantive revisions to the document, with only minor formatting changes and a revision to the title to include: “notification.”

- **Document 50FR – On-Site Examination Team Financial Review Checklist**

The five-year review process resulted in no substantive revisions to the document, with only minor edits for purposes of clarity.

Further, the Commission reviewed the following two ACCET documents and approved draft versions for a call-for-comment to solicit your views, for which a form is provided on the ACCET website at the Commission Reports page reference to the December 2007 meeting:

Call-for-Comment Solicited

- **Document 26.4 – Notification of a Change of Location**

The document was revised to clarify what an accredited entity is and what constitutes a change of location. The document now states: *“ACCET considers an ‘accredited entity’ to be a composite of the school’s administration, faculty, curricula, policies/procedures, student support systems, including the student body itself. If an accredited entity is simply relocating down the street to a new/different building with the same staff, curriculum, policies/procedures, etc., ACCET views this as a change of location within the same general geographic area and requires only notification. However, if the accredited entity closes in one location and reopens in a new location outside the general geographic area of the accredited entity which requires substantial changes in the components of the accredited entity, ACCET considers this a campus closing.”*

- **Document 33 – Definitions**

The five-year review process resulted in several proposed changes, including: (1) reference to Document 11, for Commission actions, including “deferral”, “denial”, “grant”, “show cause”, and “withdrawal of accreditation”; (2) an expanded definition of “externships/internships/practicum”; and (3) minor modifications to the definitions of “course”, “institutional accreditation”, and “vocational institution”.

Finally, the following proposed revision to the Eligibility criteria outlined in Document 1, relative to ownership and control of prospective initial applicant institutions, is recommended by the Commission for membership approval:

ACCET Membership Vote Recommended

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

A call-for-comment issued at the April 2007 meeting focuses on a Document 1, eligibility provision (#6) and further reviewed and revised by the Commission at the August 2007 meeting to allow more flexibility in considering a waiver on the basis of the following criteria: “This requirement may be waived by the Commission upon provision of acceptable documentation showing the applicant is owned or controlled by an organization and/or individual(s) with a reputable history of ethical, competent, and effective organizational management and prior experience operating an educational entity.” This proposal was to be presented for membership discussion and approval following that meeting but was not posted on the website with a form for a membership vote, which will be posted shortly for that purpose.

As a closing observation on pertinent issues of interest for your consideration and reference, I offer the following:

- By every rational indicator, we live in increasingly perilous times and that of course, includes the economy. Within ACCET’s diverse membership, roughly split between avocational/professional development and vocational institutions, such economic downturns typically impact the former somewhat negatively and the latter more positively as prospective enrollees seek expanded or alternative career skill options in the marketplace. Staying on top, if not ahead, of the curve is obviously the best we can do to adapt, but unpredictable events sometimes intervene and make it all the more complicated. Two very recent events are converging on Title IV eligible vocational schools that may amplify these concerns: (1) serious consideration being given by the Congress and Administration to changing the loan default tracking practices, which if enacted would raise the rates attributed to a sizeable segment of institutions, particularly proprietary schools; and (2) the credit crunch that has inspired a number of private education loan providers, including the biggest, Sallie Mae (SLM) to limit and/or stop making such loans due to heightening default exposure. The former issue is most susceptible to political influence by constituents and associations making a case to their elected officials, but the latter is quite disparate given the private market forces and interests involved. Not to be alarmist but, perhaps, cautious in expanding your portfolio of loan resources, looking into the direct loan program, and focusing even more on the completion and placement outcomes of students to enhance their success, likelihood of repayment, and your banker’s confidence.
- The ACCET Accreditation Workshops are held five times a year, four at the Washington office and one just prior to the annual conference, on location. As you will note from the earlier policy document approvals herein, the Commission now requires a representative from an institution coming up for reaccreditation to attend that workshop at least four months prior to the

institution's eASER due date. This was done despite the Commission's longstanding hesitance on precise prescriptiveness on such things in lieu of impelling cause to the contrary. The cause in this case is a regular pattern of last minute attendance and the resultant rush to submit an eASER, poorly presented, and equivalently judged by the on-site team as reflected in the team reports and subsequent Commission actions. Early preparation serves the best interests of your institution. Registration for the workshops can be accomplished through the ACCET website and the remaining schedule for this year is: March 10-11, May 12-13, July 14-15, and the yet-to-be determined pre-conference dates in late October/early November, in San Antonio, Texas.

- Regarding the ACCET conference, the 2007 event, held at Lake Tahoe, Nevada this past November drew 175 attendees and, by every account, was worth being there. The location, program, speakers, presentation, and good company of colleagues from our institutions, federal and state agencies, and exhibitors, truly made it a memorable event. Think San Antonio for a welcome respite this Fall, and details will be provided shortly as we are in the final negotiations with the hotel site.
- 2007 was an eventful year for ACCET, in that we were up for two major oversight renewals critical to our standing and reputation as "reliable authorities" relative to our evaluation of postsecondary education and training. First, our ISO 9001: 2000 quality certification review was conducted last June and we were so certified, for the maximum three-year period, and remain the only recognized accrediting agency of its kind to be so. Secondly, our petition for continued recognition by the U.S. Department of Education was reviewed by department staff, with no issues/problems cited, and presented before the National Advisory Committee on Institutional Quality and Integrity, on December 19th, at which our work together was praised, particularly for the emphasis we place on student outcomes. The motion approved was for a five-year grant of recognition, the maximum allowed.

In closing, I would simply like to thank you all for your commitment to the high standards your accredited status has come to clearly represent and the daily efforts you expend to place foundations under the varied aspirations your students bring to you. Such are the accomplishments that best represent this important work as a partnership for quality. Best regards.

Sincerely,



Roger J. Williams
Executive Director