



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
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January 29, 2010

*Re: Accrediting Commission Report  
December 2009 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 2009 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](http://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 December 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 16 – Transfer of Credit**

The proposed change is to 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 ACCET, such as the fact that although the institution is not accredited, its programs align and are consistent with established recognized industry training standards.

### **Document 28 – Completion and Placement Policy**

Proposed are the following changes: (1) clarification that a separate Document 28.1 must be submitted for a program offered via interactive distance learning (IDL); (2) a revision to the waiver explanation deleting "*ineligible completions*", as this terminology is not used on Doc. 28.1; and (3) the following revisions to the "*Self-Employment*" section: (a) reformat the multiple student attestation; and (b) waive the first acknowledgement regarding self-employment to be signed at the time of the student's enrollment in a program for which self-employment is not a common vocational objective.

### **Document 29 – Catalog Checklist**

Propose are changes 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 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**

Proposed are changes to: (1) increase from \$350 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) allow an institution to retain the tuition for the first four weeks of training for students who enter the United States on the institution's I-20 Visa, but never start training at that institution; (3) more clearly specify that the cancellation and refund policy/practices must separately address cancellations, withdrawals, and terminations; and (4) insert additional headings in the document, for purposes of clarity.

### **Document 32 – Closing/Teach-Out Policy**

Based upon new regulations to implement the Higher Education Opportunity Act (HEOA), the following revisions are proposed: (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**

Proposed are changes 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, proposed changes are to: (1) revise language throughout the document to be consistent with the regulations; (2) 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.

### **Finalized Document Approvals**

The following revised documents were approved by the Commission. These approvals were granted after careful review and consideration of any comments received as a result of prior call-for-comment solicitation, or in such cases when the Commission determined that only minor changes were made or documents were modified to be compliant with provision of the Higher Education Opportunity Act (HEOA) and/or the regulations to implement HEOA.

#### **Document 4 – Application for Accreditation**

To prepare for the conversion to a web-based, fillable document, some of the questions and requests for information were reordered. Additionally, questions were included regarding: (1) Title IV federal financial aid eligibility and (2) multiple contacts at the institution.

#### **Document 7 – Guidelines for On-Site Evaluation Teams**

In accordance with the Higher Education Opportunity Act (HEOA), the key revision addresses requirements for the process and criteria used by ACCET to select qualified team members for on-site evaluations, specifically referenced to distance learning programs. Additional changes include: (1) modifying the listing under 1-Person Teams; (2) identifying the verification of completion and placement as an assignment for the Commission Representative; (3) stating that, if applicable, team members also will evaluate the institution against the Specific Criteria identified in the various Document 3 templates; and (4) modifying the “*During the Visit*” and “*Exit Briefings*” and “*Rating Scale*” sections.

#### **Document 11 – Policies and Practices of the Accrediting Commission**

Changes were made to be consistent with new regulations to implement HEOA. Specific changes include: (1) streamlining the “*Consideration of Actions by State and Accrediting Agencies*” section by referring the reader to [ACCET Document 48 – Policy on Adverse Actions by Other Agencies](#) in an effort to avoid duplicative and sometimes conflicting information; (2) expanding the “*Appeal Process*” section to specify the terms and conditions for submitting updated financial information on appeal and the process relative to a remanded decision; and (3) expanding the list of “*Substantive Changes*” to include three additional changes that are identified as substantive changes in federal regulations.

#### **Document 22 – Change of Ownership or Control**

Changes were made to: (1) clarify that substantive changes may not be made until one year following the consummation of a change of ownership/control and not one year following the approval date of the change; and (2) specify that, following a change of ownership, an institution may be required to send a representative to attend the next available accreditation workshop.

### **Document 25 – Policy for Approval of New or Revised Curriculum**

Document 25 was presented for updating in conjunction with related program documents (Documents 25.2-25.7). Changes include: (1) revising the definitions of “*program*”, “*course*”, and “*externship*” to be consistent with Document 33 – Definitions; and (2) moving the descriptions of required exhibits to Document 25.2 – Checklist for Application for Curriculum Revision/Addition, in an effort to be consistent with the organization and structure of other applications.

### **Document 25.2 – Checklist for Application for Curriculum Revision/Addition**

Changes were made to: (1) expand the title and (2) provide additional instructions regarding the submission of the application and required supporting documentation.

### **Document 25.3 – Employer Questionnaire and Program Overview**

Changes were made primarily to shorten the questionnaire and focus the questions on the adequacy of the proposed program curriculum and the level of market demand for program graduates. Specifically, the changes are to: (1) add the email address and ACCET ID number of the institution; (2) modify the questions to determine whether the program is sufficient in content and length to prepare graduates for employment and assess the level of projected local demand for program graduates; and (3) delete specific questions about the need for previous work experience and the availability of externships sites at the employers’ organizations.

### **Document 25.7 – Admissions Standards and Criteria**

Changes include: (1) requesting information on the institution’s re-test policy, if applicable; and (2) identifying critical admissions standards to ensure reasonable expectation of success in completing the training (e.g. externship/practicum), obtaining any applicable certification/licensure, and securing employment (e.g. vaccinations, no convictions of felony, DUI/DWI, drug offenses, etc.).

### **Document 26 – Review and Approval of Additional Locations**

The change is to specify that a letter of interim approval will include information and timelines relative to attendance at the next available accreditation workshop to ensure that staff at these locations are knowledgeable of ACCET standards, policies and practices.

### **Document 29.1 – Enrollment Agreement Checklist**

The change requires 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 enrolling students: (1) the payment periods or periods of obligation for the program; (2) the schedule of payment, based upon these payment/obligation periods; and (3) the impact of these payment/obligation periods on the institution's cancellation and refund policy.

### **Document 31 – Cancellation and Refund Policy**

The change increases the maximum that an institution may retain in the event that a student withdraws or terminates during the first week of classes. Additionally, when a student is recruited from outside the United States or its territories and possesses a student visa to enter the country for study, there is an increase in the maximum total that may be retained, if a student, accepted by the institution, cancels prior to the start of scheduled classes or never attends class (no-show).

### **Document 36 – Leave of Absence Policy**

The change is to allow a student enrolled under a F-1 or M-1 Visit to be granted multiple leaves of absence for a maximum total period in accordance with: (1) the written leave of absence policy of the institution, (2) the regulations of the Department of Homeland Security, and (3) sound educational and professional practice.

### **Document 50-I – On-Site Immigration Compliance Checklist/Guidelines**

The change is to specify, with a revision to the heading on the checklist, that the on-site team will determine whether the student files include each student's U.S. address.

## **Other Business**

### **Five-Year Review of ACCET Standards**

At its December meeting, the Standards and Policy Review Committee (SPRC) conducted an initial review of the current ACCET standards based upon a thorough analysis of the results of a recently conducted ACCET Standards Review Survey of: (1) ACCET member institutions, (2) former and current Commissioners, (3) the Standards Review Advisory Committee, and (4) ACCET staff. Sixty-four survey respondents affirmed the overall relevancy, adequacy, and clarity of the current ACCET Standards and, therefore, the need for relatively minor revisions to the standards. On a five-point scale, 31 of the 33 standards received ratings of at least 4.0 for relevancy, adequacy, and clarity. Thirteen standards receive ratings of at least 4.5 for all three criteria. Therefore, at its December meeting, SPRC initially drafted important, but not sweeping changes to the standards. At the April meeting, the Commission will review initial proposed changes to the ACCET standards, with a subsequent review (call for comment) by the ACCET membership and other interested parties. Following the August 2010 meeting, the membership will be sent final proposed standards and a call for a vote. At the 2010 Annual ACCET Conference, members will consider the proposed ACCET standards for final adoption.

## **USDE Regulations**

The final regulations responsive to the Higher Education Opportunities Act (HEOA) were published in early November 2009, following a successful USDE Negotiated Rulemaking (NegReg) process last spring in which we participated. As previously noted, a relatively small number of those changes required substantive revision of ACCET policy and procedure; and the most significant revisions have already been incorporated, including those effecting the appeals process, teach-outs, and transfer of credit. This past Fall, another NegReg was established that seemed to be a more politically slanted approach to a number (14 total) of issues, including two very hot button issues: (1) incentive pay for admissions staff, and (2) a gainful employment “definition” that essentially aimed for price controls on tuition under cover of ability to repay loans based on expected salary for training-related employment. Five of the fourteen issues, including those two, were voted down without the required consensus, which resulted in the entire group failing to be approved as required for negotiated rulemaking. It is not clear how the USDE is going to move on these issues but it will have to publish proposed rulemaking to the field and the fairly broad opposition at the NegReg meeting would hopefully temper some of the approaches originally presented by the Department.

## **Website/Database Upgrade**

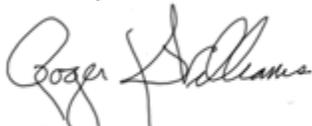
The design specification phase has matured to the development phase, which has presented further opportunity for us to refine a number of processes and practices that can be made much more efficient and effective for the Commission and staff internally and the membership externally. As for the website, the design of a seamless portal for interaction and communications that presents both an improved information channel and a fresh look for the membership and agency to the world remains the prime objective and October 2010 the expected roll-out date.

## **Annual Conference**

With registrations approaching double the previous year in San Antonio, the Palm Springs 35<sup>th</sup> annual conference turned out to be a great success with a solid program of presentations in a nice setting at a reasonable expense. The 2010 conference is being scheduled for the end of October at the Westin hotel in Savannah, Georgia, for which information will be circulated shortly.

In closing, I would simply like to thank you all for your continued commitment to the high standards reflected in your ongoing support of accreditation reflected in the work you invest in your students aspirations each day. Such are the accomplishments that best represent this important work as a partnership for quality.

Sincerely,



ELECTRONIC SIGNATURE

Roger J. Williams  
Executive Director