



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
1722 N. Street, N.W., Washington, D.C. 20036  
Telephone : 202-955-1113 Fax: 202-955-1118  
<http://www.accet.org>

September 21, 2012

*(via email distribution)*

***Re: Accrediting Commission Report  
August 2012 Meeting***

Dear ACCET and Other Colleagues:

This letter is presented as an update on the actions undertaken by the ACCET Accrediting Commission at the August 2012 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)). A synopsis of the Commission's actions on ACCET policies undertaken at the August 2012 meeting is included as follows: (1) solicitation of a call for comment (under "News"), and (3) finalized document approvals (under Documents and Forms).

As a reminder, the Commission's Standards and Policy Review Committee (SPRC) reviews specific policies that have been identified for review and revision to address governmental regulatory requirements, issues of concern arising from its reviews, and patterns of good practices, in addition to an ongoing review of policies that have not been subject to review for a period of five years. This report is posted on the website under Commission Reports.

### **Call for Comment Solicited**

#### **1. Document 5 – Guidelines for the Utilization of External Consultants in the Accreditation Process**

As part of the five-year policy review, proposed are changes to clarify ACCET's position relative to the utilization of external consultants in the Accreditation Process and the rationale for requiring all communications between an institution and ACCET to be with the primary contact person of the institution and not with an external consultant.

#### **2. Document 25 – Policy for Approval of New or Revised Programs**

Proposed are changes for purposes of clarity and consistency, including: (a) changing the document name to Policy on Programs and Courses to reflect the full scope of the policy, which is not limited to the approval of new or revised programs; (b) clarifying what documents are required for a complete program application; (c) requesting that partial program applications identify the site(s) where the new or revised program will be offered; (c) modifying the examples of a change in the instructional delivery format/methodology or an additional delivery method added to the program; (d) streamlining the partial program applications required for: (i) a change in the instructional delivery format/methodology or an

additional delivery method added to the program and (ii) offering an already-approved program at an additional location that is out of the general market area; and (e) identifying the types of program changes which do not require ACCET approval or processing fees, provided the changes are not made in conjunction with other substantive program modifications.

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

In preparation for the transition of program applications to the ACCET Accreditation Management System (AMS), proposed are changes to align the three program applications (Document 25.1, Document 25.OAD, and 25.IDL), including the following proposed changes to Document 25.OAD: (a) revise the order of the items to be consistent with the other program applications; (b) refine the language in Items 1 and 7; (c) request, as an exhibit, the sites where the program will be offered; (d) expand the instructions relative to the exhibits required to be submitted with the application; (e) request a needs analysis, consistent with other program applications; (f) simplify item 12 and direct Title IV institutions to also complete and submit Document 25.9 – Application for Review of Clock Hour-to-Credit Hour Conversion based on Work Outside of Class, if applicable; and (f) direct institutions making application for programs with an externship/internship component to submit the new ACCET Document 25.8 – Externship/Internship Component to a New or Revised Program, instead of referring them to Document 25 to identify the additional required information.

### **4. Document 25.IDL – Application for Interactive Distance Education Program**

In preparation for the transition of program applications to the Accreditation Management System, proposed are changes to align the three program applications, including the following proposed changes to Document 25.IDL: (a) revise the order of the items to be consistent with the other program applications; (b) refine the language in Items 1, 4, 5, 7; (c) expand the instructions relative to the exhibits required to be submitted with the application; (e) request a needs analysis, consistent with other program applications; (f) simplify item 12 and direct Title IV institutions to also complete and submit Document 25.9 – Application for Review of Clock Hour-to-Credit Hour Conversion based on Work Outside of Class, if applicable; and (g) direct institutions making application for programs with an externship/internship component to submit the new ACCET Document 25.8 – Externship/Internship Component to a New or Revised Program, instead of referring them to Document 25 to identify the additional required information.

### **5. Document 25.1 – Application for New or Revised Program/Course and Document 25.2 – Checklist for Application for New or Reviewed Program/Course**

In preparation for the transition of program applications to the Accreditation Management System, proposed are changes to align the three program applications, including the following proposed changes to Document 25.1: (a) merge Document 25.1 and Document 25.2; (b) refine the language in Items 4 and 5; (c) request, as an exhibit, the sites where the program will be offered; (d) expand the instructions relative to the exhibits required to be submitted for complete program applications and partial program applications; (e) simplify

item 11 and direct Title IV institutions to also complete and submit Document 25.9 – Application for Review of Clock Hour-to-Credit Hour Conversion based on Work Outside of Class, if applicable; and (f) direct institutions making application for programs with an externship/internship component to submit the new ACCET Document 25.8 – Externship/Internship Component to a New or Revised Program.

**6. Document 25.7 – Admissions Standards and Criteria**

Proposed are changes relative to the admittance of applicants who do not possess a high school diploma or GED equivalency at vocational institutions to reflect recent changes to federal Title IV federal financial aid regulations disallowing funding for ability-to-benefit enrollees.

**7. Document 25.8 – Externship/Internship Component of a New or Revised Program**

Currently, the instructions for program applications direct institutions to “Refer to ACCET Document 25 – Policy on Approval of New or Revised Programs for additional information required for a program that includes an externship/internship”. For easier reference, proposed is a new document which lists the additional information (as identified in Document 25) to be submitted with an application for a program with an externship/internship component.

**8. Document 25.11 – Clock Hour to Credit Hour Conversion**

This document is being renumbered (from 25.8 to 25.11), because of the proposed addition of Document 25.8 - Externship/Internship Component of a New or Revised Program.

**9. Document 28 – Completion and Placement Policy**

Proposed are changes, including: (a) establishing a separate Document 28.IEP for Intensive English Programs; (b) defining training-related employment, with examples; (c) clarifying that validated part-time and temporary employment requires a graduate to have worked the equivalent of a minimum of 30 work days within a three consecutive month period; and (c) minor clarification edits.

**10. Document 28.1 Definitions – Completion and Placement Statistics – Definitions and Explanations**

Proposed are changes to the instructions for completing Document 28.1 – Completion and Placement Statistics, including: (a) updating Document 28.1 at least quarterly, consistent with longstanding policy in Document 28 – Completion and Placement Policy; (b) deleting the name/title of placement staff and signatures; (c) clarifying enrollee transfers; and (d) providing a definition of training-related employment, consistent with Document 28.

### **11. Document 28.IEP – Completion and Placement Policy for Intensive English Programs**

Proposed is a new document pertinent to institutions with Intensive English Programs, which: (a) provides guidance to IEPs as to how to track and report completion and (b) establishes an 85% completion benchmark for IEPs.

### **12. Document 28.2 – Completion Statistics for an Intensive English Program**

Proposed is a form to be utilized by institutions to track and report the completion of Intensive English Programs (IEPs).

### **13. Document 49.1 – Notice to Students: ACCET Complaint Procedure**

As part of the five-year policy review, proposed are revisions to: (a) clarify that students are to refer to the institution's written complaint procedure and pursue this process first; (b) advise students that complaints will be processed by ACCET only if they involve ACCET standards and policies; (c) clarify what information is to be provided by the complainants, consistent with Document 49 – Policies and Procedures for Processing Complaints Initiated Against ACCET Accredited Institutions.

## **Final Approval**

### **1. Document 1 – The Accreditation Process**

A change was made to the section on "Eligibility" for accreditation, which required approval by the membership. The list of eligibility requirements identified in Document 1 include that institutions must meet applicable state licensing requirements. Although stated in numerous other ACCET policies, a change was made to the eligibility requirements in Document 1 to specifically state that institutions must also "*meet applicable federal requirements, such as those of the U.S. Department of Education and the Department of Homeland Security (SEVP)*". Additional changes were made to: (a) eliminate specific deadlines for an accepted initial applicant to notify ACCET of its request not to have a Readiness Visit or to submit Document 8 – Request for On-Site Examination Visit, since these deadlines are specified in the acceptance letter to an applicant; and (b) clarify that ACCET approval is required for new/revised programs, new locations, and changes of ownership/control, name, and location, with applications for approval requiring documentation of state approval, exemption of state approval, or approval/licensure by means of accreditation.

### **2. Document 1.1 – Initial Accreditation Process**

Changes were made to be consistent with Document 1 – The Accreditation Process and Document 45 – Steps to Follow for Reaccreditation, including modifications to the sections pertaining to the Analytic Self-Evaluation Report (ASER) and Readiness Visit (RV). Additional changes were also made to incorporate information contained in Document 1 – The Accreditation Process, Document 4 – Application for Accreditation, and/or in the acceptance letter to initial applicants to advise them: (a) to refer to Document 1 for a listing of the eligibility requirements for accreditation including the requirement of at least two

years of continuous ownership; (b) no substantive changes are to be made in the operation of their institutions from the date of the ASER submission to the Commission's accreditation decision; and (c) programs without enrollments will not be reviewed or evaluated during the on-site evaluation team visit.

### **3. Document 45 – Steps to Follow for Reaccreditation**

Changes were made to: (a) revise the document to be more consistent with Document 1 – The Accreditation Process and Document 1.1 – Initial Accreditation Process relative to the terminology and processes incorporated into the Accreditation Management System (AMS); and (b) change the document name to “Reaccreditation Process” and the document number to 1.2.

### **4. Document 3.IDL – Interactive Distance Learning (IDL) Template**

Changes were made for purposes of clarity and consistency with federal requirements relative to: (a) methods utilized by institutions to verify the identity of students, including measures/safeguards in place to ensure that students enrolled in IDL programs are the individuals completing assignments, tests, and evaluation; and (b) notice to students, prior to enrollment, relative to the methods established by the institution to verify the identity of students and any charges associated with these verification methods. To be consistent with federal requirements, the Commission granted final approval of the document at this meeting; however, the document was also approved to go out for comment, with any comments received to be considered at the next Commission meeting.

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

Changes were made to address federal criteria required of accrediting agencies, including: (a) identifying when a complete or partial reevaluation is required of an institution as a result of one or more substantive changes; (b) specifying the maximum period an extension for good cause may be granted following a 12-month show-cause directive; and (c) modifying the notification process following a final decision to deny or withdraw accreditation, consistent with federal requirements. These changes have been in practice for some period of time, but for written policy to be consistent with federal requirements, the Commission granted final approval of the document at this meeting; however, the document was also approved to go out for comment, with any comments received to be considered at the next Commission meeting.

### **6. Document 18.IEP – Satisfactory Progress Policy (NEW)**

This new policy was developed to provide institutions offering Intensive English Programs with guidance regarding the elements of a Satisfactory Progress (SP) policy, an issue that has been garnering closer attention by SEVP. In response to comments received from institutions, additional changes were made to: (a) require mid-term evaluations for programs with terms of more than four weeks in length (instead of terms of four weeks or more); (b) modify the language regarding limits on the number of times students may repeat levels; and

(c) extend from 24 months to 36 months a student's maximum total cumulative length of training.

**7. Document 22 – Policy of Change of Ownership and/or Control**

A change was made to clarify that the Executive Committee may grant reinstatement of accreditation following a change of ownership and/or control.

**8. Document 23 – Admissions Credentials/Ability to Benefit**

In light of recent changes to federal Title IV federal financial aid regulations relative to ability-to-benefit, revisions were made to ACCET Document 23 and the policy relative to the admittance of applicants who do not possess a high school diploma or GED equivalency at vocational institutions. Modifications included: (a) changing the document name to Admissions Requirements and Ability to Benefit; (b) advising institutions of the ineligibility of new ability-to-benefit students to participate in Title IV federal financial aid programs after July 1, 2012; (c) encouraging institutions to refer students without completion of high school or GED equivalency to independently operated GED programs or GED programs conducted by their institutions provided that the final GED testing is conducted by an independent organization; (d) requiring institutions to secure documentation that each applicant meets all admissions requirements prior to the applicant's start of training; and (e) reinforcing long-standing policy, now separated from Title IV requirements, that institutions admitting applicants without evidence of high school or GED completion must: (i) document the ability of the applicants to benefit from training by means of an admissions test and (ii) implement a written policy on test administration and grading to ensure the integrity, independence, and validity of the testing process.

**9. Document 27 – Guidelines for Filing Financial Reports**

The primary purpose for revising this document was to expand the sections pertaining to Title IV eligible institutions, particularly relative to loan default issues. Changes included: (a) modifying the name of this document to Policy on Financial Reporting and Financial Stability to reflect the full scope of the document; (b) adding a specific statement that ACCET Title IV institutions must meet all regulatory requirements, including those pertaining to loan default in order to maintain Title IV eligibility; (c) adding a footnote with the "late fee and penalty" policy found in Document 10 – Fee Schedule and deleting the restatement of that policy provision; (d) under the section "Documentation Requirements", providing examples of information to be submitted (e.g. letters of credit and default prevention plans); (e) adding the requirement that institutions provide ACCET with notices received from regulatory agencies, specifically to include notices of draft cohort default rates; (f) amending the name of the section on "Compliance Financial Stability Issues" to "Compliance and Financial Stability Issues"; (g) explicitly adding to the list of regulatory compliance issues: "cohort loan default rates which may subject the institution to loss of eligibility to participate in Title IV federal financial aid program(s)"; and (h) indicating that institutions determined to have concerns relative to financial stability and compliance will be referred to the Commission's Financial Review Committee (FRC) for follow-up as appropriate, which may include placing the institutions on restrictions and reporting and/or on institutional show cause. Following the call for comment an additional change was made

to expand the list of actions that may be taken by the Commission against institutions determined to have financial stability and compliance concerns to include: restriction and reporting, institutional show cause, and the denial or withdrawal of accreditation.

#### **10. Document 27.1 – Specific Requirements for Filing Financial Report**

Changes were made to: (a) establish a separate section (Section B) on “Additional Financial Reporting Requirements for Title IV Applicants/Eligible Institutions”; (b) identify reporting requirements for Title IV eligible institutions in addition to those identified for Title IV applicants; and (c) reference limited liability companies.

#### **11. Annual Reports and Monitoring Changes in Enrollment (Enrollment Growth or Decline).**

This new internal document was developed to formally address the federal criteria requiring accrediting agencies to develop and implement a written policy to define and monitor significant enrollment growth as reported by member institutions.

### **Other Business**

#### **Petition for Continued USDE Recognition**

As previously reported, due to delayed appointments to the current NACIQI following the re-composition mandated in the 2007 HEOA (now 18 members with six each from the House, Senate, and Executive branch), scheduling had to be revised resulting in ACCET being scheduled for review at the June 2013 meeting. The entire staff is actively working on the preparations for that petition, which is due at the USED on January 4, 2013. You can find further insight to the process, the Department’s website ([www2.ed.gov/admins/finaid/accred/index.html](http://www2.ed.gov/admins/finaid/accred/index.html)) provides extensive material, including the Criteria for Recognition. As you have experienced with regulations applicable to school operations, they are subject to interpretation and sometimes frustratingly ambiguous; however, I am quite confident that we run a very sound operation focused on well-established standards and policies, demonstrated, measurable outcomes, rigorous reviews including unannounced quality assurance visits, and the overall integrity of the process.

#### **ACCET Website/Database Update**

The roll-out of our Accreditation Management System (AMS) at the 2010 Annual Conference was a major milestone for ACCET following a 15 year run with its predecessor database that had been showing its age. Our website gateway running in tandem with the AMS offers a more substantive array of information, easier navigation, and a refreshed look that has been well-received. That said, the AMS remains a work in progress, representing a number of significant leaps forward (ASER preparation, team report/response submissions, and Commission meeting workflow), as well as some frustrating impediments to your and our workflow (applications, payments, and annual reports) and, ultimately, high hopes and expectations that both our design specs and the development team were well chosen and remain aimed at a successful finale by the close of the year.

### **38th Annual Conference**

Hopefully you are planning ahead for an early November trip to Lake Tahoe, Nevada for a repeat of our 2007 conference at that location. The Accreditation Workshops will be held on November 3-4; the Team Evaluator Workshop on November 4; and the conference on November 5-7. This is a particularly special venue to both kick back and reboot your outlook and insights on a variety of issues directly impacting your schools with a substantive program of seminars and breakout sessions. It's also a great opportunity to meet and greet old and new colleagues to mix it up with a lot of shop talk and a healthy share of socializing to lighten up the event. Rumor has it the Executive Director will be offering a dynamic Business meeting report with a detail analysis of the ACCET complaint log and other fascinating facts and figures of great interest to all. Seriously, we all hope to see you there for this annual reunion of colleagues.

Thank you as always for the important contributions your daily work invests in this important Partnership for Quality.

Sincerely,



ELECTRONIC SIGNATURE

Roger J. Williams  
Executive Director