September 30, 2011

Re: Accrediting Commission Report
August 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 August 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.acacet.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 August 2011 meeting posted earlier on the home page of the ACCET website to include: (1) solicitation of a call for comment (under “News”) by the membership and (2) finalized document approvals (under Documents and Forms). 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.

Call for Comment Solicited

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

1. Document 1 – The Accreditation Process

Proposed are the following changes: (a) modify the description of the accreditation process consistent with the new Accreditation Management System (AMS) and the submission of documents through AMS, including the application for accreditation, ASER/BASER, visit request, and team report/institution’s response; (b) updated titles of ACCET documents; (c) the requirement for a Preliminary Evaluation Assessment Visit (PEAV) for initial applicants unless a Special Consideration is requested by the institution and granted by the Commission; and (d) clarification of the section on the time schedule for initial applications for accreditation.
2. **Document 3.IEP – Intensive English Program (IEP) Template**

Proposed are the following changes: (a) clarify the language under Specific Field Criteria regarding the minimum qualifications for instructional personnel under Standard VI-A, Qualifications of Instructional Personnel and (b) add questions under Standard II-A, Governance requesting additional information, if the institution is regulated, licensed, and/or approved by a state agency.


Proposed are the following changes: (a) modify the section relative to documents that the Commission may review as part of its deliberations; (b) eliminate reference to “electronic or e” when referring to the Analytic Self-Evaluation Report (ASER); (c) clarify the policy on potential conflicts of interest relative to differentiating between abstentions and recusals; (d) specify that the Commission may require a new and/or revised ASER from an initial applicant when a follow-up on-site visit is directed; (e) clarify that grants of reaccreditation may be for one, three, or five years; (f) 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 decision; (g) clarify the language relative to withdrawal of accreditation; (h) clarify the membership of the independent three-member appeals panel and the guidelines regarding the admissibility of evidence in an appeal hearing; (i) modify the section pertaining to the option of an appeals panel to “amend”; (j) specify explicitly that ACCET counsel may be present to provide procedural and legal advice to the appeals panel; (k) clarify the language regarding ownership changes under the section entitled “Substantive Changes”; and (l) structure a new section entitled “Other Commission Actions”, as referenced in (f) above, that includes: (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”.

4. **Document 18.1 – Satisfactory Academic Progress (SAP) Policy Checklist**

Proposed are the following changes to the checklist to be consistent with Document 18 – Satisfactory Academic Progress Policy and the requirements of the new federal Program Integrity Regulations: (a) require that increments for SAP evaluation align with the payment periods of Title IV institutions; (b) include a warning policy, if applicable; and (c) require an academic plan for a student, before an appeal is granted.

5. **Document 18 Attachment – Sample Satisfactory Academic Progress Policies for Both Credit and Clock Hour Programs**

Proposed are modifications to the sample SAP policies to be consistent with the federal Program Integrity Regulations, including the requirements for: (a) incremental evaluations to align with payment periods; (b) warning periods not to exceed one payment period; (c)
academic plans before an appeal may be granted; and (d) transfer credits to count in the numerator and denominator when calculating the maximum period for program completion.

6. **Document 27.1 – Specific Requirements for Filing Financial Reports**

   Proposed are the following changes: (a) emphasize that financial statements may be compiled, reviewed, or audited in accordance with GAAP and the requirements for specific types of institutions outlined in ACCET Document 27; (b) add the “Reminder” section from Document 27; (c) delete the requirement for a pro forma statement for applications for new branches, auxiliary classrooms, and changes of ownership; and (d) require a balance sheet, with a signed attestation, that reflects the financial condition of the institution following a change of ownership and/or control, and removal of the requirement for a partial period financial statement.

   **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 response or, in very limited cases, when the Commission determined that only the most minor changes were made.

1. **Document 13 – Bylaws:**

   Modifications were made to: (a) state explicitly that ACCET is a charitable corporation; (b) eliminate reference to the corporation being organized for scientific purposes; (c) clarify the well-established practice that institutions must comply with ACCET policies and procedures as well as its standards; (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) clarify the section on “Number of Commissioners, Tenure, and Qualifications” relative to the factors considered and the method by which the size of the Commission may be changed; (f) clarify the section on “Vacancies and Appointments” by specifying the process for filling any vacancies below the allowable maximum number of Commissioners; (g) clarify that the Chair of the Commission is the Chair of the Executive Committee; and (h) clarify that the appeals panel is independent.


   Minor modifications were made for purposes of clarity and to reflect the electronic submission of financial statements.


   Minor modifications were made for purposes of clarity relative to: (a) alternative financial reporting being available for eligible institutions and (b) attestations for financial statements.
4. **Document 29.1 – Enrollment Agreement Checklist**

Minor modifications were made to item # 7 to clarify that clock hours and, if applicable, credit hours must be identified in the enrollment agreement.

5. **Document 49 – Policy and Procedure for Processing Complaints Initiated Against ACCET Accredited Institutions**

As part of the five-year review process, revisions were made: (a) require institutions to provide the address of ACCET in addition to the provision of ACCET’s contact information (address, phone number, and email), without students having to request the information; (b) revise the section regarding the maximum time lapse between an alleged incident and the filing date of a complaint; (c) clarify the criteria for determining whether a complaint is with or without urgency; and (d) slightly reduce the maximum time for complaints to be initially processed by ACCET.

6. **Document 49.2 – Policies and Procedures for Processing Complaints Initiated Against ACCET**

As part of the five-year review process, this document was reviewed and approved without modifications.

Many of these policy and procedural issues are a continuation of the review processes initiated in response to the U.S. Department of Education regulatory revisions resulting from the Program Integrity regulations published on October 20, 2010, taking effect on or after July 1, 2011 depending on the Department’s guidance on various issues, including those characterized with a “good faith” period. These regulations have been and will continue to be very challenging to both the schools and accrediting agencies to ensure compliance and our Commission and staff have been working diligently to keep up with demands internally and externally to keep up with the evolving application of those regulations based upon our best understanding. In addition to the policy and procedural updates to our documents, the webinars conducted some months back and posted on our website, we will have a number of presentations on various aspects of the current regulatory environment during the upcoming ACCET Annual Conference with the anticipation that many of you will be in attendance to benefit from that information directly as well as networking with your colleagues who are similarly struggling with these issues.

Sincerely,

![Signature]

Roger J. Williams
Executive Director