



January 31, 2009

**Re: Accrediting Commission Report
December 2008 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 2008 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 on the website under Commission Reports.

Provided below is a synopsis of the Commission's actions on ACCET policies at the December 2008 meeting to include: (1) a call for a vote by the membership, (2) a call for comment by the membership, (3) finalized document approvals, and (4) other actions by the Commission. 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 a Vote By Membership

(The draft document and membership voting form are available on ACCET's website)

Document 1 – The Accreditation Process

Document 1 was presented to SPRC with proposed changes to page 4, paragraph 6 in the Eligibility section of the document. The proposed change is to broaden ACCET's ability to waive the two-year continuous ownership requirement for an organization or individual with a "reputable history of ethical, competent, and effective organizational management and **prior experience operating an educational entity**". Currently, the requirement is that individuals have "**extensive credentials that demonstrate competent administration of an accredited institution**". The Commission approved this document to be sent out for a vote of the ACCET membership.

Call for Comment Solicited

(The draft documents and call for comment form are available on ACCET's website)

Document 16 – Transfer of Credit Policy

As part of the normal review process, Document 16 was presented to SPRC for updating, review, and/or revision, particularly in light of the newly enacted Higher Education Opportunity Act (HEOA). The proposed change is to have institutions disclose in their transfer of credit policy any articulation agreements that they have established with other higher education institutions, in accordance with the requirements of HEOA. The Commission approved this document to be sent out for comment.

Document 22 – Change of Ownership or Control

Document 22 was presented to SPRC for updating, review and/or revision. Under consideration are revisions to the policy document pertaining to changes of ownership in conjunction with proposed revisions to Document 22.1 – Application for Reinstatement of Accreditation Following a Change of Ownership or Control. Changes are proposed for purposes of clarity and to more closely align the definition of a “change of ownership with a change of control of a proprietary institution” with the definition used by the US Department of Education. The Commission approved this document to be sent out for comment.

Document 24 – Profile of Institutional Clientele and Programs

As part of the normal review process, Document 24 was presented to SPRC for updating, review, and/or revision, particularly in light of the newly enacted Higher Education Opportunity Act (HEOA). Minor changes are proposed to this document. The Commission approved this document to be sent out for comment.

Document 33 – Definitions

Document 33 was presented to SPRC for updating, review, and/or revision. Proposed are modifications to the definitions of “branch”, “auxiliary classroom”, and “classroom extensions” to be consistent with recent changes to Document 26 – Review and Approval of Additional Locations. The Commission approved this document to be sent out for comment.

Finalized Document Approvals

(The following documents were approved after a careful review of all comments received as a result of a call-for-comment solicitation.)

Nursing and Allied Health Template

Proposed were additional questions to the Electronic Analytic Self-Evaluation Report (eASER) to be answered by institutions offering nursing and allied health programs that provide laboratory practice involving the handling of blood and other body fluids as part of their training. At the April 2008 meeting, the Commission approved the establishment of a task force to draft a Nursing and Allied Health Template for consideration by the

Commission at the August 2008 meeting. The proposed template includes additional questions to be addressed under the following ACCET Standards: IV-A Educational Goals and Curricular Objectives; V-B Externship/Internship; V-C Equipment/Supplies; V-D Facilities; and VII-A Enrollment.

At the August 2008 meeting, the Commission approved this document to go out for comment. Upon review of all written comments, the Commission approved this new document to supplement the eASER/eBASER.

Document 22.1 – Application for Reinstatement of Accreditation Following a Change of Ownership or Control

As part of the normal review process, Document 22.1 was presented to SPRC for updating, review, and/or revision. Changes were proposed to: (a) add the ACCET ID number; (b) simplify, clarify, and/or highlight instructions; and (c) request additional information about multi-tier ownership structures. At the April 2008 meeting, the Commission approved the document to go out for comment. At the August 2008 meeting, the Commission tabled this document until the December 2008 meeting in order to consider revisions to this application in conjunction with possible revisions to Document 22 – Change of Ownership or Control, the policy document pertaining to changes of ownership. Subsequently, the application was redesigned to eliminate possible confusion caused by having a separate page 1 for proprietary (for-profit) institutions and non-profit institutions. Upon review of all written comments, the Commission approved this revised document.

Document 25 IDL – Application for Interactive Distance Learning Program

As part of the normal review process, Document 25 IDL was presented to SPRC for updating, review, and/or revision. No changes were made to this document.

Document 26 – Review and Approval of Additional Locations

Document 26 was presented to SPRC for updating, review, and/or revision. For purpose of clarity, the revised document describes separately the application process for branches, auxiliary classrooms, and classroom extensions. In addition, changes were proposed to: (a) revise the definitions of “branch”, “auxiliary classroom” and “classroom extension” to be consistent with those in the newly revised ACCET Document 33 – Definition; (b) eliminate the maximum five-mile limit for classroom extensions; and (c) require notification, not ACCET approval, for temporary classroom extensions utilized by avocational institutions for less than six-months. At the August 2008 meeting, the Commission approved this document to go out for comment. Upon review of all written comments, the Commission approved this revised document.

Document 26.1 – Application for a Branch

As part of the normal review process, Document 26.1 was presented to SPRC for updating, review, and/or revision. Minor changes were proposed to clarify, simplify, and highlight instructions. At the August 2008 meeting, the Commission approved this document to go out for comment. Upon review of all written comments, the Commission approved this revised document.

Document 26.2 – Application for an Auxiliary Classroom

As part of the normal review process, Document 26.2 was presented to SPRC for updating, review, and/or revision. Minor changes were proposed to clarify, simplify, and highlight instructions. At the August 2008 meeting, the Commission approved this document to go out for comment. Upon review of all written comments, the Commission approved this revised document.

Document 26.3 – Application for a Classroom Extension

As part of the normal review process, Document 26.3 was presented to SPRC for updating, review, and/or revision. No substantive changes were proposed to this document. At the August 2008 meeting, the Commission approved this document to go out for comment. Upon review of all written comments, the Commission approved this revised document.

Other Actions by the Commission

Document 18 ESL – Satisfactory Progress (SP) Policy

A new document, Document 18 ESL, was proposed to provide guidance to avocational ESL institutions regarding the elements of a Satisfactory Progress (SP) policy. At the April 2008 meeting, the Commission approved the document to go out for comment. In response to the comments, the language in Section D was modified to clarify that each level may be repeated once, and, at the discretion of the school director, one level may be repeated a second time.

At the August 2008 meeting, the Commission approved this document to be sent out again for comment in order to solicit further feedback from member ESL institutions. After reviewing the comments of ten ESL institutions and discussing the matter at length, the Commission decided not to move forward with this document, but rather to consider possible clarifications to Document 3.2/3 ESL – Template for English Speakers of Other Languages (ESOL) and/or Document 50I – On-Site Immigration Compliance Checklist/Guidelines.

Document 18.1 ESL – Satisfactory Progress (SP) Policy Checklist

A new document, Document 18.1 ESL, was proposed to provide a checklist regarding the elements of a Satisfactory Progress (SP) policy for avocational ESL institutions. At the April 2008 meeting, the Commission approved the document to go out for comment. At the August 2008 meeting, the Commission approved this document to be sent out again for comment in order to solicit further feedback from member ESL institutions. After reviewing the comments of ten ESL institutions and discussing the matter at length, the Commission decided not to move forward with this document, but rather to consider possible clarifications to Document 3.2/3 ESL – Template for English Speakers of Other Languages (ESOL) and/or Document 50I – On-Site Immigration Compliance Checklist/Guidelines.

Conceptual Call for Comment

In the interest of greater transparency, at the April 2008 meeting, the Commission approved the following conceptual call for comment on the possible future posting of Commission actions (including institutional show-cause directives) on the ACCET website in a manner that is more readily accessible to the public: “As a U.S. Department of Education recognized accrediting agency, ACCET is subject to the statutory and regulatory requirements of the Higher Education Act (HEA), which Congress has been working on for years under continuing resolutions that may or may not be coming to fruition in this session. Amongst the many priority topics under review is the issue of transparency, specifically as it related to providing the general public and prospective students with pertinent information about schools to allow informed decisions. Under provisions put in place following the 1997 amendments, ACCET notifies Federal, State, and other agencies of various actions by our agency such as grants, denials/withdrawals, resignations/expirations, institutional show cause directives, etc., some of which are also posted on the ACCET website, but much of which is not readily available to and/or discoverable by the public. With that in mind, and in keeping with ACCET’s forward-looking approach to policies and practices that aid for a sound balance between the ideal and the pragmatic, the Commission requested a “conceptual” call-for-comment to solicit the views of our member institutions in regard to the transparency issue. There is no simple formula likely albeit one might be forced on the agencies by the HEA, but your thoughtful perspective on the possible future posting of actions/status, including show cause directives, on the ACCET website in a manner that is more readily accessible to the public would be both helpful and appreciated.” After reviewing the written comments at the August 2008 meeting, the Commission approved a draft document to go out for comment. However, because of the enactment of the Higher Education Opportunity Act (HEOA) on September 8, 2008, the Commission decided to table this matter until the provisions of HEOA are better understood and the ACCET website is restructured based on the approach to be taken.

Electronic Transcripts

Because of the increasing utilization of electronic transcripts, SPRC was asked to consider whether ACCET should develop a policy and/or guidance regarding their use. If warranted, SPRC was asked to identify the elements to include in an ACCET policy on electronic transcripts. After discussion, the Commission recommended that further research be conducted before determining what, if any, policies and/or guidelines pertaining to electronic transcripts are warranted.

Other Business

ACCET Website/Database

While we have been in the planning stage for updating our website and database to facilitate communications, linkages, and submissions over the past year, we are backtracking somewhat at present to ensure our design and vendor specifications are fully vetted before undertaking such a sizable investment. There are enough horror stories floating around to give rise to extreme caution and our current database (APPX) has been operating since 1993, with reasonably good results, albeit not as user-friendly or analytically focused as we would like. It remains a work-in-progress for the next upgrade.

Higher Education Opportunity Act (HEOA)

Now that this important legislation has been up and running since August 2008, and five years overdue, the Negotiated Rulemaking process is about to get underway in March. That process sets in place the regulatory structure that establishes more nuanced interpretations of the statute, sometimes turning a mouse into an elephant or vice versa. Two individuals from our sector of national accreditors have been appointed to the NegReg panel for accreditation: Michale McComis, Executive Director of ACCSCT as the primary and myself as the alternate. The Committee's work will be completed with the final set of meetings scheduled for May 18-20.

An Economy Running on Empty

Bad times for the economy have typically been good times for education and training enterprises and the present indicators continue to reinforce that trend with publicly traded proprietary schools heading north on the stock exchange's otherwise southbound ride. There are some cautionary signs that deserve ongoing attention, largely attributable to overarching credit rating sensitivities that have combined with fear and pessimism to bring down our entire automotive empire. Students and schools rely so heavily on loans, both guaranteed and private, that they can make all the difference between enrollments heading up or down. We have taken some initial steps to trim our expenses here at ACCET just in case we are misreading the direction of the tide.

2009 Annual Conference – Palm Springs

The past year's event in San Antonio for our annual conference was a great success and we just signed the contract for the 2009 conference at the Westin Mission Hills in Palm Springs, California for the last week in October. The first notification via email sent out earlier this week and further information on the hotel, with a bargain \$149 rate, and program will follow in the weeks ahead. Please put it on your calendar.

In closing, we hope you are all off to a good start in this new year and wish you continued success in the important work you contribute to students everyday in this partnership for quality. Best regards.

Sincerely,

A handwritten signature in black ink that reads "Roger J. Williams". The signature is fluid and cursive, with the first name "Roger" being particularly prominent.

ELECTRONIC SIGNATURE

Roger J. Williams
Executive Director