



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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January 31, 2012

*Re: Accrediting Commission Report
December 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 December 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.accet.org). A synopsis of the Commission's actions on ACCET policies undertaken at the December 2011 meeting posted earlier on the home page of the ACCET website is included as follows: (1) solicitation of a call for comment (under "News") by the membership and (2) finalized document approvals (under Documents and Forms). It is noted that the Commission's Standards and Policy Review Committee (SPRC) reviews 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. This report is also posted on the website under Commission Reports.

Call for Comment Solicited

1. Document 3.IEP – Intensive English Program (IEP)Template

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

2. Document 18.IEP – Satisfactory Progress Policy (NEW)

Proposed is a new policy document 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.

3. Document 11 – Policies and Practices of the Accrediting Commission:

In the interest of transparency, an increasingly important component in support of the validity and reliability of accreditation, proposed is a change to have the institutional directory on the

ACCET website identify those institutions issued an institutional show cause directive and provide access to a copy of the show cause letters.

4. Document 35 – Policy on Attendance Requirements

Proposed are the following changes: (a) identify relevant ACCET standards; (b) add language to be consistent with ACCET standards; (c) state that minimum standards of attendance must be consistent with any attendance requirements of State, federal, licensing, and/or certifying agencies (e.g. The Department of Homeland Security requires that students enrolled in Intensive English Programs attend at least 18 hours of instruction per week); (d) add a section on Additional Policy Requirements for Vocational Institutions to include: (i) a minimum 80% attendance rate for completion/graduation for students enrolled in vocational programs; (ii) an advisory note that institutions that participate in Title IV federal financial aid may be more widely required than originally interpreted to have a minimum 90% attendance requirement; and (iii) participants are informed, on a regular and timely basis of their progress in meeting the standard of attendance, for which good practice would suggest counseling those students in jeopardy of failing to meet the institution's requirements well before reaching the critical thresholds impacting satisfactory progress.

5. Document 36 – Leave of Absence Policy

Proposed are the following changes to the leave of absence policy relative to students enrolled under a F-1 or M-1 visa: (a) unless otherwise stipulated and documented, a leave of absence for an emergency situation may not extend beyond 50% of the student's length of enrollment; (b) the length and frequency of vacation leaves must be consistent with the curriculum and not impede student progress; and (c) leaves of four weeks or more may require retesting upon reentry into the program.

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. ACCET Commission Code of Conduct & Annual Affirmation (NEW)

This new document consolidates into a single document ACCET's rigorous and long-standing conflict of interest policies and practices for ACCET Commissioners, officers, and committee members designated by the Commission, including those policies found in Document 11 – Policies and Practices of the Accrediting Commission and ACCET Conflict of Interest Policy Relative to Financial Transactions.

2. Document 1 – The Accreditation Process

Modifications were made to: (a) revise 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) update titles of ACCET documents; (c) add a paragraph regarding "integrity" under the Principles of Ethics for ACCET Accredited Institutions section; (d) change the name of a Preliminary Evaluation Assessment Visit (PEAV) to a Readiness Visit (RV); (e) change the Readiness Visit from being optional to having it scheduled for all initial applicants to assist them in assessing their preparedness for the full on-site team visit, unless the applicant notifies ACCET with a written notice of its decision to decline the Readiness Visit; and (f) clarify the section on the chronological schedule for initial applications for accreditation.

3. Document 3.1 – Analytic Self-Evaluation Report (ASER)

A change was made to align the ASER and Team Report by moving the questions pertaining to assigned credit and work outside of class from Standard III-C, Financial Aid/Scholarships to Standard IV-A, Educational Goals/Objectives. Although the review of assigned credit is required for federal financial aid purposes, the on-site evaluation of credit and work outside of class is a curricular matter involving Curriculum Specialists as they assess whether (a) course syllabi include a description of required work outside of class, including an approximation of the time required; (b) the institution is assigning student work outside of class, consistent with the syllabi; (c) work outside of class is evaluated and included as a criterion and appropriately weighted in determining the final course grade; (d) the hours of work outside of class are: (i) consistent with those reported on the syllabi and curriculum materials and (ii) educationally sound and defensible.

4. Document 4 – Application for Accreditation

Minor modifications were made to streamline the attestation to be signed by an authorized representative of the institution, as a result of changes to Document 1 – The Accreditation Process. The attestation no longer lists separately the goals and integrity of the accreditation process, because they are now incorporated in the expanded Principle of Ethics for ACCET Institutions section in Document 1.

5. Document 10 – Fee Schedule 2012

Changes were made to the fees for: (a) application for initial accreditation and reaccreditation; (b) the accreditation workshop; (c) on-site examination fees; (d) course revisions; (e) clock hour review; (f) clock-to-credit hour conversion; and (g) application for change of ownership. Sustaining fees remain unchanged for the fourth consecutive year in consideration of the continuing impact of the economic downturn.

6. Document 11 – Policies and Practices of the Accrediting Commission:

Changes were made to: (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 abstentions and recusals; (d) explicitly state 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) state that ACCET counsel may be present to provide procedural and legal advice to the appeals panel; (k) explicitly state that the appeals process does not allow for consideration of changes subsequent to the effective date of the Commission’s decision to deny or withdraw accreditation; (l) clarify the language regarding ownership changes under the section entitled Substantive Changes; (m) 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; and (n) clarify that substantive change is prohibited in the twelve-month period following provisional approval of a change of ownership and/or control.

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

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

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

Modifications were made 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 as a condition for an appeal to be granted; and (d) transfer credits to count in the numerator and denominator when calculating the maximum period for program completion.

9. Document 22 – Change of Ownership and/or Control

Modifications were made to: (a) advise that, consistent with new federal requirements, institutions that participate in Title IV Federal Financial Aid must obtain provisional approval from ACCET within thirty days of the date of the change of ownership or risk serious consequences relative to the potential discontinuance of financial aid eligibility and (b) clarify that substantive changes are prohibited in the twelve-month period following provisional approval of a change of ownership and/or control.

10. Document 22.1 – Application for Reinstatement of Accreditation Following a Change of Ownership or Control of an Institution

Minor changes were made to the attestation in this document to be consistent with the attestation found in other ACCET documents which requires an authorized representative of the institution to affirm that the institution will abide by: (a) ACCET Bylaws, (b) ACCET Principles of Ethics, (c) ACCET Eligibility Requirements, (d) ACCET Standards of Accreditation, and (e) ACCET policies, procedures, and practices.

11. Document 25.10 - On-Site Review of Assigned Credit Hours and Work Outside of Class

A new document was approved to be utilized for the on-site review of assigned credit based on work outside of class for purposes of financial aid, as required by the federal Program Integrity Regulations. The form is to be used by the team to document whether: (a) course syllabi include a description of required work outside of class, including an approximation of the time required for a student to complete the assignment; (b) the institution is assigning student work outside of class, consistent with the syllabi; (c) work outside of class is evaluated and included as a criterion and appropriately weighted in determining the final course grade; (d) the hours of work outside of class reported on 25.6b – Clock Hours and Credit Hour Breakdown – By Program and Course are: (i) consistent with those reported on the syllabi and curriculum materials and (ii) educationally sound and defensible. The document was approved for immediate implementation, with a follow-up review to be scheduled in 2012.

12. Document 27 - Addendum Affidavit – Annual Affidavit of an Institution Filing Under Alternative Financial Reporting

At the recommendation of the Financial Review Committee, the following minor changes were made to the Annual Affidavit to be submitted by those limited types of institutions filing under alternative financial reporting: (a) changing the order of items and (b) no longer requiring the document to be notarized.

13. Document 27.1 – Specific Requirements for Filing Financial Reports

Modifications were made to: (a) emphasize that financial statements must 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

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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 remove the requirement for a partial period financial statement.

Many of these policy and procedural issues are a continuation of the comprehensive review and revision 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 the evolving interpretation and application of those regulations based upon our best understanding.

In similar fashion, the statutory and regulatory issues associated with the Department of Homeland Security, Student Exchange Visitors Program (SEVP) impacting students enrolled under F-1 and M-1 visa program have become more prominent over the past year, culminating in specific requirements for holding status with U.S. Department of Education recognized accrediting agencies such as ACCET. While the Commission continues to approach the development and implementation of policies and procedures, the balance between prescriptiveness and flexibility is weighted to the latter so long as good practice clearly remains the dominant operational characteristic of ACCET member institutions.

As we begin our 38th year of operations as an accrediting agency, our reputation for holding each other accountable to the highest standards remains a central tenet to the credibility of the process and the 680 institutions that support it. Despite the failings of a few and the distorted perspective of bad news that always seems to trump good news, the daily accomplishments of the vast majority of you in guiding your students toward their aspirations is praiseworthy by any reasoned measure. That's reason enough to look forward to a good year.

Best Regards,



ELECTRONIC SIGNATURE

Roger J. Williams
Executive Director