



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
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January 18, 2011

*Re: Accrediting Commission Report  
December 2010 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 2010 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) solicitation of 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 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/form responsive to this call for comment are available on ACCET's website

- **Document 15 - Clock Hour and Credit Hour Policy (NEW):**

Proposed is a new document developed in response to recently promulgated federal regulations regarding credit hours. Much of the document is based on existing language from Document 25 – Policy for a New or Revised Program/Course, with proposed new language highlighted. Additional language is included to clarify that for institutions utilizing a credit-hour measurement, ACCET requires outside preparation such as homework to be documented in the curricular materials and syllabi, including an approximation of the time required for the student to complete the assignments. Further, the evaluation of homework and/or out of class student work must be identified as a grading criterion and appropriately weighted in determining the final grade for a course or module. This document is a preliminary draft designed to elicit comment and suggestions as to how to appropriately and effectively respond to new federal regulations going into effect July 1, 2011.

- **Document 18 – Satisfactory Academic Progress Policy and Document 18 Attachment – Sample Satisfactory Academic Progress Policies for Both Credit & Clock Hour Programs:**

Proposed are changes in response to recently promulgated federal regulations regarding satisfactory academic policy (SAP) consistent with specific requirements mandated for appeals by students who fail to meet SAP standards.

- **Document 30 – Policies for Recruiting, Advertising, and Promotional Practices:**

Proposed are changes in response to recently promulgated federal regulations regarding misrepresentations and misleading statements to prospective students, students, members of the public, accrediting, federal, and state agencies. The changes provide specific guidance on: (a) various prohibited forms of misrepresentation; and (b) the institution's responsibility to ensure a clear and accurate representation of applicable accreditation (institutional, programmatic, and specialized) referenced to any program-related certifications necessary for employment of its graduates.

- **Document 25 – Policy for New and Revised Curriculum:**

Proposed are changes to: (a) establish a limit on the number of out-of-scope programs that may be approved initially and require documented evidence of the successful outcomes of graduates (e.g. above-benchmark completion and placement rates) of the initial offering of such programs over a period of at least twelve months, before additional programs in the new field may be approved; and (b) clarify that for institutions utilizing a credit-hour measurement, ACCET requires outside preparation such as homework to be documented in the curricular materials and syllabi, including an approximation of the time required for the student to complete the assignments. Further, the evaluation of homework and/or out of class student work must be identified as a grading criterion and appropriately weighted in determining the final grade for a course or module.

### **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 such cases when the Commission determined that only the most minor changes were made.

- **Document 1.1 – Initial Accreditation Process:**

Changes were made to the initial applicant process to reflect the use of the recently implemented Accreditation Management System (AMS) and the submission of documents through the web-based system. Additionally, the name of the document was changed from “Initial Inquiry/Applicant Process” to “Initial Accreditation Process”.

- **Document 3.FLT – Foreign Language Training (Excluding Intensive English Programs) Template (NEW):**

This is a newly created document to be utilized as an overlay template to Document 3.2 – Analytic Self-Evaluation Report to be completed by institutions offering foreign language training for avocational purposes (excluding IEP Programs). The template expands upon

specific ACCET Standards by adding Specific Field Criteria and Supplemental Questions/Statements, in order to elicit a more relevant and valid self-evaluation of the institution and emphasize those standards where unique characteristics are identified.

- **Document 12 – ACCET Annual Reporting Requirements (NEW):**

This is a new document which describes the annual reporting requirements for ACCET members, representing a component of Document 14 – ACCET Reporting Requirements, which identifies all reporting events.

- **Document 12.a – Annual Report and Data Verification (NEW):**

As part of the annual reporting process this new document is intended to facilitate the subsequent submission of Document 12.b – Annual Report and Enrollment Statistics by ensuring the listing of approved programs is correct. Each institution is therein directed to review its information on the ACCET database/website (AMS) to affirm or correct the information, particularly the listing of programs.

- **Document 12.b – Annual Report and Enrollment Statistics (Modified Document #):**

Changes were made to clarify the directions for calculating and reporting participant clock hours. Additionally, the document number was changed from 12 to 12.b, because of the introduction of Document 12.a – Annual Report and Data Verification.

- **Document 12.c – Annual Completion and Placement Statistics (Modified Document #):**

As a result of the review and renumbering of all annual reporting documents, the number for this document was changed from 12.1 to 12.c.

- **Document 14 – ACCET Reporting Requirements (Modified Document #):**

Changes were made to: (a) add the new Document 12.a – Annual Report and Data Verification and (b) renumber Document 12--Attachment to #14, because the document describes all reporting requirements, including those for changes of ownership, additional sites, programs, and other events requiring ACCET notification.

- **Document 22.1 – Application for Reinstatement of Accreditation Following a Change of Ownership and/or Control:**

Changes were made to: (a) make more consistent the contact information for each owner that is requested in Document 4 – Application for Accreditation and Document 22.1 and (b) allow the flexibility to modify Table II-A-1 on page 3 using the web-based AMS to more effectively elicit a breakdown of the ownership of institutions, particularly those with multiple levels of ownership. The information (data fields) will remain unchanged; however, the structure is expected to be further developed in order to offer a clearer and more informative representation of the ownership.

- **Document 25 – Policy for New or Revised Curriculum:**

The changes were made as a result of converting to an electronic web-based program application process, to include: (a) change the title to “Policy for a New or Revised Program/Course”; (b) clarify that ACCET institutions must use the Carnegie Unit (clock-to-credit hour conversion) for academic purposes; (c) modify the definition of IDL to be consistent with Document 3.IDL – Interactive Distance Learning Template; (d) add the Interactive Distance Learning (IDL) section, the paragraph from the IDL Template regarding limitations on IDL enrollments; (e) make more consistent the exhibits to be submitted with all program applications (Document 25.1, 25.OAD, and 25.IDL); (f) modifying and reducing, the data elements requested for program revisions requiring a partial application; (g) defining “general market area”; and (h) requesting the submission of the Document 25.1, instead of the former letter of notification, for minor program revisions.

- **Document 26 – Review and Approval of Additional Locations:**

Changes were made as a result of converting to an electronic web-based application process to include: (a) establishing a formalized application process for approving temporary/seasonal classrooms utilized for avocational Intensive English Programs; (b) facilitating the approval, reporting, and recording of temporary/seasonal classrooms; and (c) editing the document for purposes of consistency and clarity.

- **Document 26. 5 – Application for Approval of Temporary/Seasonal Classrooms for Intensive English Programs (IEPs):**

Changes were made as a result of converting to an electronic web-based application process to include: (a) establishing an application for the approval of temporary/seasonal classrooms utilized for avocational Intensive English Programs; and (b) facilitating the approval, reporting, and recording of temporary/seasonal classrooms.

- **Document 27 Addendum to Document 27 - Guidelines for Filing Financial Reports – Alternative Financial Reporting:**

Because of the financial protections provided by the parent corporation of these eligible institutions, a change was made to permit institutions eligible for alternative financial reporting to submit attested, internally generated financial statements for the previous two years with their applications for reaccreditation, instead of compiled financial statements.

- **Document 28 - Completion and Placement Policy:**

Changes were made to the Reporting Requirement section to require that: (a) data collection instruments (Document 28.1, for vocational institutions) be maintained at least every quarter (instead of every 90 days), (b) the annual submission deadline for Document 28.1(s) be no later than May 1<sup>st</sup> (instead of March 31), and (c) the final placement calculations may be

delayed for up to four months (instead of 90 days) after the scheduled graduation date, in consideration of the impact on job placement for graduates owing to the tight economy.

- **Document 28.1 Definition - Completion and Placement Statistics – Definitions and Explanations:**

Consistent with those revisions in Document 28 relative to the tight economy, changes were made to: (a) extend the submission deadline from March 31 to May 1 for the annual submission of Document 28.1(s) – Completion and Placement Statistics and (b) state that final placement calculations may be delayed for up to four months (instead of 90 days) after the scheduled graduation date.

- **Document 50FA – On-Site Financial Aid Review Checklist/Guidelines:**

Changes were made to Section IV – File Review to be completed by the on-site review team for all Title IV eligible institutions to determine whether refunds are made in an appropriate and timely manner. The changes were to: (a) shorten the title of the document; (b) clarify the directions for conducting the review; and (c) modify the table to be completed by the team.

- **Document 50FR – On-Site Examination Team Financial Review Checklist:**

A change was made to create a new Section IV – File Review to be completed by the on-site review team for all institutions (except Title IV eligible institutions for which that file review is included in Document 50FA) to determine whether refunds are made in an appropriate and timely manner to withdrawn students. The section is similar to that found in Document 50 FA – On-Site Financial Aid Review Checklist/Guidelines, which is applicable to Title IV eligible institutions. Additional changes were made to: (a) make the title of the document title more consistent with Document 50FA; and (b) clarify the directions for the file review.

## **Other Business**

You will be receiving further email notifications periodically in conjunction with the launch of the new ACCET Accreditation Management System (AMS) and website initialized at the Annual Conference, November 1<sup>st</sup>. This project development remains a work in progress and the entire staff has been actively involved with the Cyanna software development team in crafting an information collection, storage, reporting, and analysis system aimed at simplified member access to its institutional records and submission of various application requests, including the ASER/BASER for reaccreditation. For those of you who have been involved in such projects at your own institutions as well as those coming up for reaccreditation in the April 2011 review cycle and beyond, you have undoubtedly experienced the process of intermittent progress and setbacks that accompany the phase-in stages of development. We are trying to accomplish this in the least disruptive manner possible and sincerely appreciate the patience and persistence of all involved as we roll-out the various functional elements. It is our collective hope and expectation that you will find the look, feel, and serviceability of the new ACCET AMS and

website to be greatly simplified, more informative, and interactive. Do not hesitate to contact the office with any questions or need for assistance.

On another matter of significance to those of you operating vocational, Title IV eligible institutions, the USDE regulations scheduled to be in effect July 1, 2011, you will note in the previous section on policies that the Commission has been working to incorporate those requirements directly effecting the accreditation into the process in as thoughtful and practical manner as possible. Your responsiveness to the call-for-comment solicitation will be helpful to ensuring we get it right. A critical issue that has elicited a number of phone calls and emails seeking guidance relative to the credit hour conversion remains an obvious concern for which there is little direct interpretation from the Department at present and a meeting scheduled by them with the accrediting agencies for January 24<sup>th</sup> has just been cancelled until further notice. We have had some sidebar conversations with Department staff but the needed clarification on implementation relative to what specific requirements are expected for agencies to follow in offering guidance to our institutions beyond the long established Carnegie Unit for evaluating the conversion remains in question. A careful reading of the call-for-comment associated with Document 25 – Policy for new and Revised Curriculum is instructive on the Commission's present reading of the direction implied in the new regulation, namely the immeasurable assumption of outside preparation being raised for the first time as a credit conversion criterion. In the context of distance education, where there are no fixed classroom hours to simply convert for credit equivalence, this issue becomes far more challenging to the use of such conventions and professional judgment is very likely the best anyone can achieve.

It seems like only a short time ago that the Higher Education Opportunities Act was laboriously working its way through Congress to the President's desk and yet the renewal phase is already taking shape in various meetings scheduled in the coming months, including one at which we have been invited to present in early February before the National Advisory Committee for Institutional Quality and Integrity. Education and training are central to our future and the tax dollars that largely fund it are going to be more closely scrutinized than ever, along with questions on the role and value of accreditation. The question of accountability lurking in so many investigations, hearings, and media reports that raise serious doubts as to whether the self-regulation inherent to accreditation is a valid and reliable means of assuring the public that the high level of quality and ethics is as evident as it is professed and promoted. It is a challenge we are up to despite the failings of a few; and while bad news seems to always trump the good news of daily accomplishments that the vast majority of you demonstrate each day in moving your students forward toward their aspirations, their success is the ultimate reward.

Best Regards,



ELECTRONIC SIGNATURE

Roger J. Williams  
Executive Director