

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM: Accrediting Council for Independent Colleges and Schools
DATE: June 29, 2012
SUBJECT: Final Criteria and Other Information

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	(Please respond by Tuesday, July 17, 2012)	

I. FINAL CRITERIA REVISIONS

In June 2012, the Council reviewed specific areas of the ACICS *Accreditation Criteria* outlined in Section I. The language contained in Section I was previously reviewed by ACICS constituents or reflects a clarification of previously approved criteria.

The Council has updated the respective sections of the *Accreditation Criteria* to reflect all final criteria revisions. To obtain a current copy of the *Accreditation Criteria*, please visit our Web site at www.acics.org. The *Accreditation Criteria* can be found in the **Publications** section of the Web site.

The following criteria were previously reviewed and unless otherwise noted, have been accepted as **final, effective immediately** (new language is underlined, ~~deleted language is struck~~):

A. DUE PROCESS

Explanation of Changes

The Council has approved final language revisions to clarify its due process policies as described in the Accreditation Criteria. These changes will allow ACICS to demonstrate to the U.S. Department of Education that its due process regulations and protocols balance the need for due process protections with the expectation that institutions or programs found to be out of compliance by the Council are blocked, in a timely manner, from continued access to federal student financial aid.

2-3-300 - ACCREDITATION DENIED

Denial of an accredited status is characterized by the Council as a “withholding” action and is differentiated from suspension of accreditation, which is a “withdrawal” action. There are two levels of denial. One totally withholds accreditation of the institution or a branch; the other denies approval of a requested substantive change. Denial at either level constitutes a negative action and is challengeable by the institution. The process of challenge, however, is different for each level of denial as separately described in Sections 2-3-301, 2-3-302, and 2-3-303. In all cases of denial, the Council will give the institution written reasons for the denial, which are subject to modification through the appeals processes as later described and explained. Denial actions that are not appealed in accordance with the appeals procedures provided by the Council are considered final actions.

2-3-301. Denial of Initial Grant. An institution that objects to a Council decision to deny an application for an initial grant of accreditation has the right and will be given the opportunity to present its case and to be heard at the next meeting of the Review Board.

At such a hearing, the institution may not present new evidence for consideration and must follow the procedures described in Section 2-3-600.

2-3-302. Denial of New Grant, Branch Inclusion, or Change of Ownership/Control. An institution that objects to a Council decision to deny an application for a new grant of accreditation, inclusion of a branch campus, or reinstatement of accreditation following a change of ownership or control has the right to appeal the decision to the Review Board pursuant to the procedures described in 2-3-604. ~~and will be given the opportunity to present its case and to be heard pursuant to the hearing procedures described in Section 2-3-500.~~

2-3-500 - COUNCIL HEARING PROCEDURES

The following procedures will govern hearings to be held before the Council:

(a) The request for a hearing must be made by a date determined by the Council, which will not be less than 10 days from the date of receipt of the letter of notification of the ~~denial action or~~ show-cause directive. The request for a hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the request for a hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing, including the dates by which the institution must submit its response to the ~~findings of the denial action or~~ show-cause directive. ~~In all cases, the interval between the negative or conditioning action of the Council and the subsequent action of the Council based on the hearing of the institution's appeal shall not exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length.~~

2-3-501. Hearing Format. Hearings before the Council resulting from a ~~denial motion or~~ a show-cause directive and involving areas of noncompliance other than or in addition to financial concerns will take place before a panel of commissioners.

A hearing panel will be designated by the Council to hear the presentation of the institution. The panel will present its findings and its recommended action to the full Council, which will make the final decision in a timeframe not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the Accreditation Criteria.

ARTICLE VII

Appeals Process

Section 2-Due Process. Criteria promulgated by the Council shall ensure that institutions are provided a fair and reasonable opportunity to present reasons through an appeals

process why denial, suspension, withdrawal, or other final actions taken by the Council are inappropriate and should be remanded for further consideration. The due process provided is ~~not required to be a full hearing on the record or before the full Council.~~ an appeal to the Review Board, pursuant to the procedures described in 2-3-604. ~~However,~~ All appeals to the Review Board for Appeals shall be on the record and shall provide for the submission of briefs and oral testimony by institutional representatives.

B. TEAM SELECTION, COMPOSITION STANDARDS AND CENTRALLY CONTROLLED INSTITUTIONS

Explanation of Changes

The Council approved minor edits to terminology in the Accreditation Criteria to ensure consistency with its Bylaws in the definition of academic, administrative and public representatives. These changes will not impact the current procedures for vetting qualified team members as subject specialists or as having an expertise in distance education. Additionally, the terminology changes include the use “centrally controlled” to replace “distributed enterprise” throughout the Accreditation Criteria.

2-1-401. Selection of Team Members. Evaluators are selected from among educators, executives, and practitioners in business, administrative, and technical fields, and from state departments of education and other evaluation and approval bodies. The person designated as chair of the team ~~always will be an~~ is experienced in management and is responsible ~~person who has responsibility~~ for assuring that the visit is conducted fairly and thoroughly.

2-1-402. Composition of Teams. The size and qualifications of the team are determined at the discretion of the Council based on the type and size of the institution, the type and number of programs being offered, the mode of educational delivery, location of the campus, student enrollment, credentials offered, and other special circumstances such as visits to centrally controlled academic administrative centers. Full-team on site evaluation visits ~~Teams conducting evaluations~~ will consist of individuals serving as academic, administrative, public or member representatives as defined in Appendix A - Bylaws. ~~at least one person from another ACICS-accredited institution and at least one person who does not represent an ACICS-accredited institution, at a minimum.~~ ~~Additional team members will be named as needed and at the Council's discretion based on the student enrollment and the credentials offered by the institution, or to serve as subject specialists to evaluate specialized programs.~~ ~~Teams conducting evaluations of distributed enterprise administrative centers will also include members experienced in and trained to evaluate academic and other administrative control systems for relevant functions.~~ The Council makes a conscious effort to send visitors who have had experience in an institution offering and awarding similar academic credentials.

The application forms and the completed self-study will be supplied to members of the visiting team for review prior to the visit and for use during the visit.

2-1-404. Staff Member on Visit. A member of the ACICS staff accompanies teams on all visits. In the event that an ACICS staff member is unable to accompany a team on a visit, the use of a qualified and trained contractor may be used as the ACICS staff representative on the visit. The ACICS staff representative is responsible for assuring that comparability is achieved from visit to visit and from institution to institution. The same ACICS staff representative who accompanies a team also is available when ACICS deliberates and may be asked questions about what was observed and reported by the team during the visit.

2-1-501. Scope of Visit. The scope of a visit will depend on the location, operation, size, program offerings and classification of the institution. For a multiple campus institution, the main campus and all additional locations are subject to evaluation, either in conjunction with the main campus or separately. ~~For a distributed enterprise, a representative sample of campuses will be selected, at the discretion of the Council, for visits at reasonable intervals. This sample will generally include a minimum of 50% of the campuses included within the distributed enterprise, and at least a minimum of three campuses. Council reserves the right to increase the number of campuses to be visited, based upon factors such as retention and placement rates, reporting status, complaints and adverse and any other pertinent information. Visits will also be conducted to the academic administrative center of a distributed enterprise and any affiliated locations of the administrative system.~~

2-1-503. Procedures. Institutions are provided in advance with a checklist of materials and documents that should be current and readily available for review by the team. Prior to the visit, institutions are required to update the self-study where significant changes have occurred since its submission to ACICS. Teams visiting an academic administrative center will generate a report that will be shared with teams conducting visits to the individual campuses within the centrally controlled structure. ~~the campuses of a distributed enterprise will be provided with a copy of the team report from the visit to the academic administrative center.~~

During the visit, institutions are expected to make provisions for adequate consultation between team members and the faculty, administrative staff, and students and chief onsite administrative officer ~~academic officer.~~ ~~Teams visiting the campuses of a distributed enterprise are expected to consult with the institution's chief academic officer. Some teams also may want to consult with the institution's board of directors or trustees and community leaders or employers.~~

The team prepares a written report that covers each area reviewed at the institution and includes other information pertinent to an accurate evaluation. The report subsequently is sent by the team chair to ACICS.

An exit conference is conducted at the conclusion of the visit and is attended by the chief executive or administrative officer of the institution and any others designated by the chief executive officer. During the session, the chair of the team will summarize the

evaluation team's findings. Members of the team also may append to the report ~~suggestions~~ recommendations for institutional improvement, ~~but such suggestions are not a part of the official team report later considered by ACICS.~~ The visiting team is not a decision making body.

2-1-601. Opportunity to Respond. The ACICS office sends a copy of each evaluation team report to the designated representative at the centrally controlled academic administrative center or of a distributed enterprise, to the chief on-site administrator of the respective multiple or single campus institution. ~~of a multiple campus institution and to the chief on-site administrator of a single campus institution.~~ These individuals are invited to respond ~~to it~~ in writing within the specified time frame

2-1-602. Intermediate Review. All materials pertinent to an institution's accreditation are reviewed by experienced persons before being reviewed by the Council. These materials include, but are not limited to, the institution's self-evaluation report(s), the visiting team report(s), the institution's response(s) to the team report, financial records of the institution (which are not examined by the evaluation team), ~~the institution's current~~ catalog(s), and any official reports from state or federal regulatory bodies.

~~This group~~ The Intermediate Review Committee (IRC) upon intensive review of institutional files, makes ~~will make a~~ recommendations to the Council of possible accreditation action. ~~to ACICS if the evaluation file is complete. If the file is not complete, the reviewers will organize facts for ACICS but will not make a specific recommendation. The Council has the option of postponing examination of files that are incomplete at the time of the intermediate review, even if subsequent information has been received by the time ACICS meets.~~

2-1-603. Council Review. All materials collected during the evaluation process are reviewed by the ~~ACICS~~ Council. Only the Council can take a final accreditation action.

II. FOR INFORMATION

A. PROPOSED REVISIONS TO STUDENT ACHIEVEMENT STANDARDS

Explanation of Changes

*The Council intends to use the occasion of its re-recognition by the U.S. Department of Education as an opportunity to establish, articulate and implement a new set of expectations for member institutions, specifically in the areas of student achievement and success. Although these expectations are set in order to implement the Accreditation Criteria, **the Council invites members to comment on these proposals, especially to identify relevant qualitative factors.** There are three sets of changes proposed below: (1) Benchmark standards to remain in good standing, (2) Compliance standards to retain accreditation, and (3) Qualitative and mitigating factors to demonstrate student success.*

1. *Benchmark Standards – Campus-level benchmarks for student retention, placement, and licensure (where appropriate) are currently set at 67%, 64%, and 60%, respectively. The Council intends to align these benchmarks with those established by other national accreditors, which are nearly all at 70%. One exception will be the ACICS benchmark for retention of students in programs that are more than one year in length, which will be set at 65% in recognition of the large number of degree-granting institutions in the ACICS membership compared to the membership of other national accreditors and the additional risk of withdrawal associated with the longer programs. Campuses falling below the 70% benchmark will be required to submit monitoring reports and may be subject to other restrictions, while both campuses and programs below the benchmarks will be required to develop improvement plans. In some cases, participation in workshops or consultations may be required.*
2. *Compliance Standards – The minimum retention, placement and licensure standards for compliance are currently at 52%, 47% and 40%, respectively. However, the Council believes that ACICS accreditation should mean that a majority of the graduates from career education programs are able to find employment related to their field of study and thus to service their student loan debt. In today's economic and political environment, these current compliance standards are no longer acceptable. To ensure a minimum level of student success, ACICS is setting each of these standards, for both the campus and program levels, at 60%. Campuses and programs whose performance falls below this level must come into compliance within established timeframes. Otherwise, accreditation of the campus or approval of the program will be subject to withdrawal.*

3. *Qualitative and Mitigating Factors* – ACICS recognizes that for evaluation of a campus or program to be comprehensive and reasonable, qualitative factors and mitigating circumstance must be taken into consideration. Therefore, as part of the annual Campus Accountability Reporting (CAR) process, ACICS proposes to invite members to submit information describing local economic and demographic conditions, trends in institutional performance, operational constraints and other circumstances that provides a more complete demonstration of student success.

PROPOSED QUANTITATIVE STANDARDS

Proposed Student Achievement Standards To Be Implemented Based on the 2013 Campus Accountability Report				
Campus Level Standards				
	Retention		Placement	
Benchmark	70%		70%	
Compliance	60%		60%	
Program Level Standards				
	Retention		Placement	Licensure^{1,2}
	<i>Tier 1 - Program Length =<1 year</i>	<i>Tier 2 - Program Length >1 year</i>		
Benchmark	70%	65%	70%	70%
Compliance	60%	60%	60%	60%

¹ Where licensure is required for employment.

² Programs must also meet any applicable state or national pass rate standards.

PROPOSED QUALITATIVE STANDARDS

The Council has expressed expectations regarding economic, demographic, operational and other mitigating circumstances under which institutions may be given additional consideration regarding their student achievement metrics. These circumstances include:

- Weak national economic conditions, such as during an economic recession or depression
- Weak local or regional considerations, such as persistence of high unemployment, low economic rates of growth, or extended employer time to hire
- Demographic conditions, such as large numbers of students with multiple risk factors identified by the U.S. Department of Education in “Students Entering and Leaving Postsecondary Occupational Education 1995-2001. According to Berkner, Cuccaro-Alamin and McCormick, 1996, these factors include:
 - Delayed enrollment after high school graduation
 - Lacking a high school diploma
 - Enrolling on a part-time basis
 - Financially independent
 - Working full-time while enrolled

- Having children younger than age 19, and
- Being a single parent
- History of Student Achievement outcomes, such as a single episode of low rates compared to a sustained pattern of marginal or declining performance
- Having at least six months after graduation or licensure, where applicable, to search for employment
- Significance of program(s) for viability of the campus
- Numbers of students enrolled or graduated
- Other mitigating circumstances unique to the institution.

B. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Tuesday, July 17, 2012**. All other materials for review during the August 2012 Council Meeting should be submitted by **Friday, July 13, 2012**.

C. ACICS AWARE WEBINARS

The AWARE webinar will be held on **Tuesday, July 10, 2012**. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar, please send an email to Ms. Terron Sales at tsales@acics.org.

III. COMMENT FORM – PROPOSED CRITERIA REVISIONS

ACICS ID Code: _____ Date: _____

Name of
Organization: _____

Address : _____

Please check (as appropriate):

Proposed *Accreditation Criteria* revisions:

- Program-Level Standards

Accept as Written Modify (please explain)

Prepared by: _____

Title: _____

Signature: _____

Please respond by Tuesday, July 17, 2012 to:

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