

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM: Accrediting Council for Independent Colleges and Schools
DATE: September 7, 2012
SUBJECT: Final Criteria, Proposed Criteria and Other Information

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I. **FINAL CRITERIA REVISIONS**

At its August 2012 meeting, 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. **PROFESSIONAL MASTER'S DEGREE**

Explanation of Final Changes

The Council approved final language permitting institutions to accept eligible students to enter professional Master's degree programs prior to completion of a baccalaureate degree if such a practice is acceptable to a specialized accrediting or state professional agency. "Professional" programs are those that prepare graduates to take an industry - recognized certification, licensure, or registration examination required to practice in the professional field.

Section 3-6-601. Enrollment Prerequisites.

... If admission to a professional program is granted without a baccalaureate degree, the burden is on the institution to demonstrate and justify that the alternate admission requirement is accepted by a recognized licensing or specialized accrediting agency and is common practice among accredited institutions of higher education.

In instances where a baccalaureate degree is not used as the threshold for admission, the following conditions must be met: (a) admission to the program may be granted only to eligible students who have completed at a minimum an associate degree or equivalent; (b) the program must ensure that a baccalaureate degree, which meets ACICS standards, is awarded upon completion of baccalaureate degree requirements or concurrently with the award of the master's degree; and (c) the baccalaureate degree program must include in its curricular requirements sufficient and appropriate bridge to master's-level courses in the field of study and must be approved by ACICS.

B. ELECTRONIC TRANSCRIPTS

Explanation of Final Changes

The Council approved final language to permit the use of electronic official transcripts to verify faculty credentials.

3-1-542. Verification of Credentials. Institutions must maintain official transcripts for credentials that qualify faculty members to teach their assigned courses and for those credentials that are listed in the catalog. All these credentials shall be on file in the administrative offices at the campus location nearest to where the faculty member is primarily employed. An official transcript is one sent from the registrar's office at the institution where study was completed directly to an employing institution- or downloaded electronically from a link provided to the employing institution from the institution where study was completed. Transcripts received electronically must bear an indication that it is an "official transcript" and the link provided must have information on how to verify the authenticity of the transcript. A transcript bearing the notation "issued to student" is not an official transcript for employment purposes.

C. DEFINITION OF DISTANCE EDUCATION

Explanation of Final Changes

The Council approved final language in the Glossary to clarify the definition of distance education.

Distance Education or Distance Learning. A structured educational situation in which ~~the instructors and learners are separated by time and location~~ students and instructors are physically separated. Distance education supports regular and substantive interaction synchronously ~~and~~ or asynchronously between instructor and learner, among learners, and between learners and learning resources through one or more interactive technologies. ~~The technologies may include the following: the internet; interactive transmissions through broadcast, closed circuit, cable, satellite, or wireless communications devices; and two-way audio or videoconferencing.~~

D. DEFINITIONS OF CAMPUS EFFECTIVENESS PLAN ELEMENTS

Explanation of Final Changes

The Council approved final language to define the required elements of the Campus Effectiveness Plan: Retention Rates, Placement Rates, Graduate Satisfaction, Employer Satisfaction, Student Learning Outcomes, and Graduation Rates in the Glossary.

Retention Rate – The retention rate is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the *Accreditation Criteria*). The Retention Rate is defined by ACICS in terms of the total student enrollment, minus those students who withdraw, divided by the total student enrollment and expressed as a percent. The retention rate is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the Guidelines and Instructions for the Campus Accountability Report, which is available on the ACICS website. The detailed formula includes definitions adjustments, and exclusions for calculating total enrollment and withdrawals. Three years of retention rate data are required in the CEP, and the institution is required to define and publish goals for retention rates. ACICS also publishes standards for campus-level and program-level retention rates which accredited institutions are expected to meet or exceed. Institutions falling below Council standards are subject to planning requirements, monitoring, show cause directives or negative action including loss of program approval, campus inclusion or institutional accreditation.

Placement Rate – The placement rate is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the *Accreditation Criteria*). The Placement Rate is defined by ACICS in terms of the total number of completers and graduates minus those who are not placed (employed) in their field of study or a related field of study, divided by the total number of completers and graduates. The placement rate is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the Guidelines and Instructions for the Campus Accountability Report, which is available on the ACICS website. The detailed formula includes definitions of in field and related field placement, adjustments, and exclusions for students not available for placement. Three years of placement rate data are required in the CEP, and the institution is required to define and publish goals for placement rates. ACICS also publishes standards for campus-level and program-level placement rates which accredited institutions are expected to meet or exceed. Institutions falling below Council standards are subject to planning requirements, monitoring, show cause directives or negative action including loss of program approval, campus inclusion or institutional accreditation.

Graduate Satisfaction Level – The level of graduate satisfaction is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the *Accreditation Criteria*). Graduate satisfaction and the level of satisfaction are defined by the institution based upon information collected on a regular basis from students who have graduated from the

programs offered by the institution. Recommended information includes the results of survey of graduates who left the institution at least 6 months prior to being contacted. Satisfaction questions should cover different aspects of the program and the institution as well as overall satisfaction of the graduate with the preparation for the position provided by the institution.

Employer Satisfaction – The level of employer satisfaction is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). Employer satisfaction and the level of satisfaction are defined by the institution based upon information collected on a regular basis from employers who have, or might, hire graduates from the programs offered by the institution. Recommended information includes a survey of local employers as well as non-local employers who have hired graduates. Satisfaction questions should cover different aspects of career preparation in general (such as professionalism, foundational and soft skills) as well as specific skills in the particular field and the overall satisfaction of the employer with the preparation of graduates provided by the institution.

Student Learning Outcomes – Student Learning Outcomes are a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). Student Learning Outcomes are defined by the institution based upon information collected on a regular basis by faculty in the programs offered by the institution. Recommended information includes data on student learning outcomes of job-specific courses as well as the outcomes of general education courses, where applicable. Measures should, where possible, be applied rather than abstract or theoretical, integrated rather than fragmented, and program-level rather than course-level or institution-level. Examples of data include student externship/practicum grades, student portfolio grades, capstone course grades, GPA, CGPA, pre- and post-tests, Ability- to- benefit (ATB) and other entrance or course placement assessments, graded portfolios, standardized tests, professional licensure exams, program reviews, skill checklists, competency tests, clinical work, and senior projects. Placement data should not be used as a measure of student learning outcomes.

Graduation Rates (when available) – ACICS is developing a measure of graduation rates that is comprehensive and applicable at the program, campus, and institution level. Once the measure has been implemented through the Campus Accountability Report and validated, the graduation rate will be a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). The comprehensive graduation rate is defined by ACICS in terms of the number of students who have completed or graduated during a reporting year, divided by the number of completers and graduates plus the number of students who have withdrawn, and expressed as a percent. The graduation rate, also called the graduates-to-leavers ratio, is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and

terms defined in the Guidelines and Instructions for the Campus Accountability Report, which is available on the ACICS website. The detailed formula includes definitions, adjustments, and exclusions for calculating completers, graduates and withdrawals.

II. **PROPOSED CRITERIA REVISIONS**

At its August 2012 meeting, the Council reviewed the specific areas of the ACICS *Accreditation Criteria* outlined in Section II and approved the revisions as **proposed** (new language is underlined, deleted language is struck). **Public comment on these revisions is requested on the Comment Form provided at the end of this memorandum.**

A. **EXTENSIVE SUBSTANTIVE CHANGES**

Explanation of Proposed Changes

The Council proposes to add language to require approval for the initiation of new programs while an institution is undergoing review for extensive substantive changes.

2-2-501. Initiation and Evaluation of New Programs. The Council must be notified prior to the start of all new programs. All new programs and modes of delivery must be initiated within one year of the planned start date. A new program must be approved by the Council before an institution or campus advertises, recruits, or enrolls students in the proposed program. The institution or campus must submit a program outline, course descriptions, an explanation of the mode of educational delivery, and supporting data. Additional information must be submitted on Council forms. The submission of an Annual Institutional Report or catalog identifying a new program does not constitute appropriate notification to the Council. Any campus required to submit a campus retention or placement improvement plan to the Institutional Effectiveness Committee must obtain prior permission from ACICS for the initiation of any new program. Any institution on interim reporting to the Financial Review Committee may be required to obtain prior permission from ACICS for the initiation of any new program. Any institution subject to a comprehensive on-site evaluation as a result of extensive substantive changes must obtain prior permission from ACICS for the initiation of any new program. ...

B. **WAIVERS**

Explanation of Proposed Changes

The Council proposes to add and delete language from two sections in order to clarify its authority to apply requirements, such as attending a workshop or participating in a consultation, to campuses and institutions which must submit student achievement improvement plans while reserving the imposition of more serious conditions, such as restrictions on offering new program unless granted a waiver, to those that are found to be out of compliance with an ACICS standard.

Section 2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) and Institutional Accountability Report (IAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure, registration or certification pass rates, if applicable. When this review indicates that the achievement of an institution's students is weak or deteriorating, the Council will require the institution to add an improvement plan within its Campus Effectiveness Plan (CEP) and/or Institutional Effectiveness Plan (IEP). If the Council determines the institution no longer complies with the Council's requirement for student achievement, the Council will issue a compliance warning, a show-cause directive or otherwise take action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. These time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement or licensure pass rates. Institutions that are required to include a plan of student achievement improvement within their CEPs or that are determined to be out of compliance with the Council's standards for student achievement are considered to be on student achievement review, and those with campus- or institution-level plans are subject to additional reporting requirements, while additional restrictions may be imposed upon those that are out of compliance.

Section 2-2-501. Initiation and Evaluation of New Programs. ... ~~Any campus required to submit a campus retention or placement improvement plan to the Institutional Effectiveness Committee must obtain prior permission from ACICS for the initiation of any new program. Any institution on interim reporting to the Financial Review Committee may be required to obtain prior permission from ACICS for the initiation of any new program.~~ Any institution under a compliance warning, a show-cause directive, a negative action, or in a probation status must obtain prior approval to apply for a new program...

III. FOR INFORMATION ONLY

A. COHORT DEFAULT RATES

As a result of the most recent reauthorization of the Higher Education Opportunity Act 2008, changes were made to the time frames used to calculate institutions' cohort default rates (CDR). In the past, the U.S. Department of Education has used a two-year time frame in its calculation. However, under the new provisions an institution's CDR is calculated as the percentage of the borrowers in the cohort who default before the end of the second fiscal year following the fiscal year in which the borrowers entered repayment. This represents a one year extension of the current default monitoring period. The FY 2009 cohort (borrowers who entered repayment between October 1, 2008 and

September 30, 2009) will be the first CDR calculation using the new standard. Thus, an institution's FY 2009 three-year CDR will be the percentage of its borrowers who were included in the 2009 cohort who subsequently default on or before September 30, 2011. Draft rates will be provided to institutions in February of 2012 with official rates released in September of 2012. For more information, visit the U.S. Department of Education's Web site at www.FSADataCenter.ed.gov.

In anticipation of having to comply with the new three-year cohort default standard, the Council reviewed options and strategies to help ACICS institutions remain in compliance. The Council has requested all institutions with cohort default rates approaching thresholds of non-compliance to submit Default Improvement Plans this spring. Institutions are also encouraged to review the informational resources and default prevention and management strategies available from ACICS and the U.S. Department of Education. The Council will closely monitor CDR rate changes, and continue to develop and deliver resources on default prevention. If you have any questions, please contact Ms. Sarah Frazier sfrazier@acics.org.

B. ACICS WEB SITE

Please visit the ACICS Web site. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: All institutions were mailed eight digit IDs and passwords to access the new ACICS website. The information was sent via U.S. postal mail and addressed to the campus director or president of each institution. The institution and corporate username (unless changed by the account holder) is the eight-digit ID. This ID should be used on all future correspondence to and from ACICS. If you have questions about your ID code or our new website, please send an email to ebiz@acics.org.

C. 2012 WORKSHOP SCHEDULE

Workshop/Webinar	Date	Location
AWARE Webinar	September 20, 2012	On-Line
Accreditation Workshop	September 20, 2012	ACICS Office
Accreditation Workshop	September 21, 2012	ACICS Office
Evaluator Webinar	September 28, 2012	On-Line
Accreditation Workshop	October 9, 2012	Dallas, Texas
Initial Accreditation Workshop	October 9, 2012	Pasadena, California
Accreditation Workshop	October 18, 2012	Kansas, Missouri

D. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Friday, November 2, 2012**.

E. PUBLIC PARTICIPATION

ACICS has given high priority to promoting and defending ACICS accreditation, and the quality of education delivered by member institutions. Schools play an important role acting as the eyes and ears of ACICS: that is, looking and listening for opportunities to promote ACICS accreditation, and to correct misinformation that may lead to negative perceptions and attitudes among policy makers, the post-secondary education community and the general public. As you identify those opportunities in communities where you operate, please let us know about them. Send an email to Mr. Quentin Dean at qdean@acics.org and let him know the source of the information and when it appeared.

F. ACICS AWARE WEBINARS

The AWARE webinar will be held on **Thursday, September 20, 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.

G. TRIAL ENROLLMENT PROGRAMS

Trial enrollment programs are covered under Section 3-1-411(c)(iii) of the *Accreditation Criteria*, which stipulates that institutions are not precluded from admitting students participating in innovative postsecondary programs specially described to ACICS. ACICS procedures support trial enrollment arrangements, which involve providing access for students to courses in a program for three or four weeks prior to having the students enroll in the program as a regular student. Trial enrollment programs may be especially useful for academic programs whose retention rates fall below compliance standards. If a trial enrollment program meets the following conditions, students during the trial period are not considered to be fully enrolled as regular students in an academic program, and therefore any student who withdraws prior to enrolling as a regular student is not counted as a withdrawal in the calculation of the program or campus retention rate.

Institutions may admit students into an approved academic program for a trial period that leads to enrollment as a regular student under the following conditions:

(i) Disclosure – Information about the trial enrollment program must be provided to ACICS prior to implementation. Information must also be published in the admissions section of the catalog, and it must describe requirements for admission, arrangements for tuition and financial aid, and the timing and options for withdrawing or continuing as a regular student.

(ii) Tuition – Students who do not elect to continue beyond the end of the trial period may only be charged a nominal fee, such as an application fee, if any, to participate in the trial enrollment program. If a student elects to continue in the program as a regular student, the student may then be assessed institutional charges, including those for the trial period.

(iii) Financial Aid – It is the responsibility of the institution to comply with the regulations of the U. S. Department of Education in connection with financial aid eligibility for students who subsequently elect to continue as regular students beyond the trial period. The conditions for receiving the Title IV, HEA program funds must be fully disclosed to students prior to enrollment.

(iv) Admission into the Trial Program – Student will be required to meet all institutional admission requirements prior to admission into the Trial Program, including documentation of graduation from high school or the equivalent. Admission records should reflect the status of all trial or conditional admissions.

(v) Instructional Materials – During the trial period, the student must have access to books and other instructional materials necessary to succeed.

(vi) Admission as a Regular Student – At or just after the end of the trial period, students will be given the option to decide whether or not to continue the program as a regular student.

(vii) Academic Credit - The trial period of attendance is a part of an approved program and academic credit earned by the student through participation in classes, completion of assignments and demonstration of learning on evaluations will count toward the student's completion of that program if the student becomes a regular student after the trial period.

(viii) Compliance – The trial enrollment program must comply with other requirements in the Accreditation Criteria, including

- 3-1-303 (d), Records and proof of graduation
- 3-1-400, Ethical Relations with Students
- 3-1-410, Admissions and Recruitment
- 3-1-420, Satisfactory Academic Progress
- 3-1-432, Tuition and Charges

(ix) Accountability Reports – Students admitted to a trial enrollment program will not be included in the Campus Accountability Report (CAR) until and unless they subsequently choose to continue as regular students beyond the trial enrollment period. Therefore, students in a trial enrollment program who do not continue as regular students will not be categorized as withdrawals from the academic program.

Academic programs which include trial enrollment should be noted and described in the campus Self-Study, and current trial enrollment figures should be included along with regular enrollment figures in the Update Report prior to team visits for initial or new grants, to enable evaluators to review both aspects of these academic programs during visits.

H. NEW CAMPUS ACCOUNTABILITY REPORT DEADLINE

In August 2012, the Council approved a November 1, 2012 deadline for the 2012 Campus Accountability Report (CAR). Students who pass required licensure exams and graduates or completers who are placed may be recorded up to the November 1st deadline. The extension of these deadlines is intended to provide more time for students who graduate toward the end of the normal reporting period on June 30, 2012, to take required exams, if required, and find employment. CAR files will be permanently locked for reporting to the Council within a week of the deadline, so please note that there is a very limited opportunity for electronic revisions and late submissions, which will carry the normal fees and penalties.

I. PROPOSED PLACEMENT DEFINITIONS

In August 2012 the Council decided to expand the current definitions of “in-field placement” and “related-field placement” to clarify its expectations for institutions, evaluators and auditors. The definitions below are organized by topic and are proposed for addition to the *2013 Guidelines and Instructions for the CAR*. Questions, comments and suggestions for implementation are welcome.

1. Relation to Program of Study:

Definition of Placement – The position is either included on the list of job titles published by the institution for which the program prepares students or it requires the use of the skills learned in the student’s program as a predominant component of the job.

This definition of placement will replace both the In-field and Related-Field placement definitions, since this distinction is not used in calculating placement rates and since the former definitions of jobs as “directly related” and “indirectly related” to a program did not provide a sufficient indication of the degree to which a job should be related to the program in order to count as a legitimate placement. In 2013, the categories for question #11 on the program form will include:

- 11a Placed
- 11b Employed, not placed
- 11c Not available for placement due to pregnancy, death or other health-related situations
- 11d Not available for placement due to continuing education
- 11e Not available for placement due to active military service
- 11f International students not available due to visa restrictions
- 11g Enrolled in a stand-alone English as a Second Language (ESL) program
- 11h Not available for placement due to incarceration
- 11i Not working

2. **Length of Employment:** For graduates placed in traditional jobs, the intention is that employment will be continuing.

3. **Non-Traditional Employment:** Documentation for self-employment, contract work, temporary employment and temporary employment agency work must include

business licenses and lists of clients or contracts. Statements or attestations from graduates that such work meets their employment goals or was disclosed as employment for which the program prepares students is also required.

4. **Payment:** Acceptable placements must involve paid employment. Internships or volunteer work are not acceptable.
5. **Evidence of placement requirements:**

New Placement: If a placement involves a new job or promotion to a new position, evidence of the placement in the form of statements made or signed by employers or graduates is required.

Possible Promotion: If the graduate is already employed in a field and completes a program because the credential is required for possible future promotion, documentation should include an attestation by the graduate or a copy of the company policy regarding the credential.

Other Professional Development: If graduates are already employed in a field and complete a program to improve their job skills, documentation should include an attestation of this goal by the graduate or a copy of the company policy regarding professional development requirements for maintaining a job, for a change or potential change in job duties, compensation, or title, and/or for professional enhancement.

J. CREDIT HOUR

At its August 2012 meeting, the Council received an update on the implementation of the new federal definition of a credit hour for purposes of allocating federal financial aid. As described in previous Memoranda to the Field, the Council has previously approved guidelines for how ACICS should comply with U.S. Department of Education regulations requiring accreditors to evaluate the accuracy and reliability with which institutions implement this definition. At this meeting, the Council directed staff to place equal emphasis on the two options for allocating credit to credit hour programs.

For credit hour programs, ACICs will conduct an effective review of two possible options for allocating financial aid credit. One option is to comply with the definition of a credit as an amount of work that reasonably approximates”one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit.” This option will be referred to as the “time-based” option. The process for evaluating compliance with this option has been discussed at some length in previous ACICS Memoranda to the Field and AWARE webinars.

A second option is for programs to comply with the definition of a credit as “the equivalent amount of work over a different amount of time.” This option will be referred to as the

“equivalent work” option. The federal definition describes “an amount of work” as “represented in intended learning outcomes and verified by evidence of student achievement,” and accreditors are required to conduct an effective review and evaluation of whether this intended and actual learning “conforms to commonly accepted practice in higher education.” Therefore, the ACICS review of programs that utilize the “equivalent work” option will include an evaluation of whether the intended learning outcomes for each course (as described on the course syllabus) and the actual student learning outcomes for the program (as described in the Campus Effectiveness Plan) are equivalent to the learning outcomes accepted as common practice in similar programs at comparable institutions.

For programs eligible to use the federal clock-to-credit hour ratios, ACICS will conduct an effective review during new grant and initial grant visits of the use by institutions of the prescribed conversion ratios and the inclusion of up to 25% of the number of direct instructional hours of out-of-class work hours in the total number of hours to which these ratios are applied. The review process for this option will be comparable to the desk reviews that are conducted by ACICS when members submit a Clock to Credit Hour Conversion Application.

Recommendations regarding the documentation that institutions should have available to support this review and how best to comply with these evaluation standards will be discussed in the next AWARE webinar and described in an upcoming Accreditation Advisory. Comments and suggestions regarding the implementation of this review and evaluation process are welcome.

IV. COMMENT FORM – PROPOSED CRITERIA REVISIONS

ACICS ID Code: _____ Date: _____

Name of
Organization: _____

Address : _____

Please check (as appropriate):

Proposed *Accreditation Criteria* revisions:

- Extensive Substantive Changes
- [] Accept as Written [] Modify (please explain)

Proposed Implementation Guidelines:

- Placement Definitions
- [] Accept as Written [] Modify (please explain)
-
- Credit Hour
- [] Accept as Written [] Modify (please explain)

Prepared by: _____

Title: _____

Signature: _____

Please respond by Friday, November 2, 2012 to:

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