FRO	M:	Accrediting Council for Independent Colleges and Schools	
DAT	E:	January 11, 2013	
SUBJ	ECT:	Final Criteria, Proposed Criteria and Other Information	
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	(Pleas	se respond by Friday March 8, 2013)	

ACICS-Accredited Institutions and Other Interested Parties

TO:

I. FINAL CRITERIA REVISIONS

At its December 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. EXTENSIVE SUBSTANTIVE CHANGES

Explanation of Final Changes

The Council approved final 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 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. Additionally, 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 Final Changes

The Council approved final language which entails additions and deletions from three 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 tThose with campus- or institution-level plans are subject to additional reporting requirements, while and additional restrictions may be imposed upon those that are out of compliance.

Section 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 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. Additionally, 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.

C. BYLAWS

The Council approved final language which changes the number of elected members from six to five.

Section 1-Composition. The Council shall consist of the elected and appointed commissioners generally representing both non degree and degree-granting institutions. It shall comprise fifteen (15) commissioners, at least six (6) five (5) of whom shall be elected by the membership and the balance of whom shall be appointed by the Council, and it shall include at least two academic representatives and at least two administrative representatives. ...

II. PROPOSED CRITERIA REVISIONS

At its December 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. CAMPUS ACCOUNTABILITY REPORT

Explanation of Proposed Changes

The Council proposes to modify language regarding the Campus Accountability Report deadline. The extension of this deadline is intended to provide more time for students who graduate toward the end of the normal reporting period on June 30, to take required exams, if required, and find employment.

2-1-801. Annual Accountability Reports. The Annual Accountability Reports must be submitted on Council forms, comply with Council guidelines, and be certified by the chief executive officer of the institution. Data must be submitted separately on the Campus Accountability Report (CAR) for each main campus and for each additional location. A distributed enterprise must also submit a consolidated Institutional Accountability Report (IAR) containing information and date on the institution as a whole. These reports are due on

or before <u>September 15 November 1</u> annually. Failure to submit the Annual Accountability Reports in a timely manner will result in revocation of accreditation.

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. 2013 WORKSHOP SCHEDULE

RENEWAL ACCREDITATION WORKSHOP		
Renewal Accreditation Workshop	February 28, 2013	ACICS Office
Renewal Accreditation Workshop	March 1, 2013	ACICS Office
Renewal Accreditation Workshop	April 18, 2013	St. Louis, MO
Renewal Accreditation Workshop	May 31, 2013	Portland, OR
Renewal Accreditation Workshop	August 28, 2013	ACICS Office
Renewal Accreditation Workshop	August 30, 2013	ACICS Office
Renewal Accreditation Workshop	October 8, 2013	Pasadena, CA
Renewal Accreditation Workshop	October 24, 2013	Indiana
CEP/CAR WORKSHOP		
CEP/CAR Workshop	August 29, 2013	ACICS Office
EVALUATOR WEBINAR		
Evaluator Webinar	January 25, 2013	On-Line
Evaluator Webinar	March 29, 2013	On-Line
Evaluator Webinar	May 31, 2013	On-Line
Evaluator Webinar	July 26, 2013	On-Line
Evaluator Webinar	September 27, 2013	On-Line
INITIAL ACCREDITATION WORKSHOP		
Initial Accreditation Workshop	February 27, 2013	ACICS Office
Initial Accreditation Workshop	June 4, 2013	Orlando, FL
Initial Accreditation Workshop	October 7, 2013	Pasadena, CA
RETENTION & PLACEMENT WORKSHOP		
Retention & Placement Workshop	February 8, 2013	ACICS Office
Retention & Placement Workshop	February 27, 2013	ACICS Office

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, March 8, 2013.**

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 **Wednesday**, **February 6**, **2013**. 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 King at tking@acics.org.

G. PLACEMENT VERIFICATION PROGRAM

Because of increased scrutiny at the state and federal levels devoted to job placement rates and to the individual student employment information on which these rates are based, the Council has decided to implement a program for third-party verification of campus placement data. The program plan summarized below is informed by the results of a pilot study conducted by ACICS to test the feasibility of third-party verification.

Program - The program will include two major components:

1. Annual Component

- a. Each accredited campus is strongly encouraged to utilize third-party verification of a minimum 25% of their placement data each year. The verification process may be determined by the campus, but it must:
 - i. be described to ACICS,
 - ii. utilize an ACICS-vetted vendor, and
 - iii. produce a report for ACICS on the findings of the process
- b. Each year ACICS will select a sample of 20% of member campuses (5% per quarter) to conduct a verification of all placement data for one quarter. This verification may be that which is conducted by the campuses' ACICS-approved third-party verifiers. For those campuses that do not conduct their own third-party verification, ACICS will contract with a third-party vendor to conduct the verification. The results of the annual review process will be reported to ACICS, including the "incorrect placement rate" and a back-up report describing all aspects of the verification process. Institutions falling below the established standard for Correct Placements will be placed on a Placement Remediation Program, including enhanced monitoring (regular 100% placement verification), a consultation, training of staff, and other reforms as necessary.

2. Reaccreditation Component

a. The year prior to expiration of an institution's grant of accreditation, each campus will undergo verification of at least 25% of its placement data, at the direction of ACICS. This verification may be conducted by the campus' ACICS-approved third-party verifier or else ACICS will contract with a third-party vendor to conduct the verification.

b. The results of the verification will be included in the institution's file along with other application materials for review by the evaluation team, the IRC, and the commissioners. The results of the verification will also be provided to the on-site evaluation team. The team will use current procedures to re-verify a sample of placement data as a check on the third-party verification.

Process – To ensure that verification is based on the most current data, placement information will be transferred electronically on a regular basis to third-party contractors using a secure process. Emphasis will be placed on verification by graduates in order to minimize additional contacts with employers. Benchmarks for the percent of incorrect placements will be established after campuses have had sufficient experience with the process. Discrepancies between contractors and career services departments will be resolved, with assistance from ACICS as necessary. Placement data will be revised, based upon input from verifiers, and institutions falling below benchmarks will be required to provide remediation and placed on heightened monitoring.

Communication – The program plan will be discussed during the next AWARE webinar. Following review of member comments and questions, a detailed description of the program will be provided in an *ACICS Accreditation Advisory* posted on the ACICS website and reviewed in a second webinar.

Implementation Plan -

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1<sup>st</sup> quarter, 2013 – Review of vendors and development of program
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2nd quarter, 2013 –Training of members and volunteers

3rd quarter, 2013 – Annual and Re-accreditation review processes to begin

4th quarter, 2013 – Placement standards and remediation process established

1st quarter, 2014 – Full implementation of annual and reaccreditation processes

Benefits – The proposed program is intended to produce benefits which include:

- More accurate placement data and resulting placement rates
- Improved Council decisions about improvement and compliance requirements
- Increased confidence on the part of the public and policy makers about ACICS placement data, the accountability of ACICS members for student achievement, and the value of ACICS accreditation

H. PLACEMENT DEFINITIONS

Based upon a review of member comments, the Council made changes to the proposed definitions for placement. Additions are <u>underlined</u> and deletions are <u>struck out</u> in these definitions, which were approved as final.

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, and it requires the use of the skills learned in the student's program as a predominant component of the job, or the

student attests to the benefit of the training received as a catalyst in obtaining or maintaining the position.

This definition of placement is intended to replace both the In-field and Related-Field placement definitions, since this distinction is not used in calculating placement rates. In 2013, the categories for question #11 on the program form would include:

11a Placed

11b Employed, not placed (used to be called "placed, out of field")

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 <u>and/or sustainable</u>.
- 3. Non-Traditional Employment: Nontraditional employment includes self-employment, contract work, temporary employment, temporary employment agency work <u>and</u> <u>international students in paid practical training</u>. Documentation for self-employment, contract work, temporary employment and temporary employment agency work <u>must</u> <u>may</u> include business licenses, 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. Business cards and stationary by themselves are not sufficient documentation.
- 4. Payment: Acceptable placements must involve paid employment. Internships or volunteer work are not acceptable, but international students in paid practical training are acceptable as placement.
- 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.

- 6. 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.
- 7. Waivers for Grads/Completers not available for placement: Current requirements would be retained for documentation that graduates are unavailable for placement due to (1) pregnancy, death or other health-related situations, (2) continuing education, (3) active military service, (4) visa restrictions for international students, (5) enrolled in a stand-alone ESL program, or (6) incarceration.

I. TRIAL ENROLLMENT PROGRAMS

The Council considered and decided against requiring prior notification to ACICS of Trial Enrollment programs, because these programs and their students are already covered by the following sections of the *Accreditation Criteria*.: 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; and 3-1-432, Tuition and Charges. Trial enrollment programs must be described in the catalog as part of the admissions process, and compliance of these programs with the *Accreditation Criteria* will be reviewed by on-site evaluation teams as a normal part of the review of admissions during an initial grant, additional location inclusion, or new grant application process. Please note that adherence to the relevant U.S. Department of Education requirements is also necessary to ensure the eligibility for financial aid of students who continue enrollment in the program beyond the trial period.

I. EXTERNAL AFFAIRS

A letter from Ms. Rochelle Hendricks, Secretary of Higher Education, New Jersey was sent to ACICS regarding recognition of out-of-state institutions accredited by an agency recognized by the Council on Postsecondary Education (Council) or the United States Department of Education (USDOE), deeming them as "duly authorized institutions of higher education" for purposes of N.J.S.A. 18A:3-15.3. This recognition includes all institutions accredited by ACICS.

This interpretation by the Secretary of Higher Education of New Jersey includes recognition of academic degrees obtained from institutions that have received national accreditation by a body recognized by the Council or USDOE, including all institutions accredited by ACICS. To obtain a copy of this communication, please email Mr. Quentin Dean at qdean@acics.org.

IV. COMMENT FORM – PROPOSED CRITERIA REVISIONS

ACICS ID Code:	Date:	
Name of		
Organization:		
Address:		
Please check (as appropriate):		
Proposed Accreditation Criteria re-	visions:	
• Campus Accountability Repo	rt	
[] Accept as Written [] Modify (please explain)	
Prepared by:		
Title:		
Signature:		

Please respond by Friday, March 8, 2013 to:

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