



ACICS Response to Order of the Secretary

May 30, 2018

Via OHA E-Filing System

Betsy DeVos
Honorable Secretary of Education
c/o Docket Clerk
Office of Hearings and Appeals
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Re: ACICS Response to April 3, 2018 Order of the Secretary
Case Name: *In the Matter of Accrediting Council for Independent Colleges and Schools*
Docket No.: 16-44-0
Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Dear Secretary DeVos:

This responds to the April 3, 2018 Order permitting ACICS to provide the following information:

- (1) an explanation of how the May 2016 Part II submission ("Part II submission") documents are relevant to demonstrating that substantial evidence exists that ACICS is compliant with the criteria deemed deficient in the December 2016 Decision of Secretary King (that explanation is attached here as **Exhibit A-O: ACICS Part II Submission Explanation (May 2018)**); and
- (2) additional relevant evidence to demonstrate ACICS compliance with criteria deemed deficient in the December 2016 Decision of Secretary King (that information is attached here as **Exhibit B-O: ACICS May 2018 Supplement**).

Respectfully Submitted,

(b)(6)

Michelle Edwards
President and CEO
Accrediting Council for Independent Colleges and Schools

Enclosures

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of May 2018, I caused a copy of the ACICS Response to the Secretary's Order to be filed via the OHA E-Filing System for delivery to the following recipient:

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(b)(6)

Michelle Edwards

Case Name: *In the Matter of Accrediting Council for Independent Colleges and Schools*

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit A-O

**ACICS Part II Submission Explanation
(May 2018)**

EXHIBIT A-O

ACICS Part II Submission Explanation

May 30, 2018

I. Introduction

On March 23, 2018, the U.S. District Court for the District of Columbia issued a Memorandum Opinion (“Opinion”) remanding the December 12, 2016 decision of Secretary King (“December 2016 Decision”) that withdrew the U.S. Department of Education’s (“the Department’s”) recognition of the Accrediting Council for Independent Colleges and Schools (“ACICS”). On April 3, 2018, Secretary DeVos issued an Order (“April 2018 Order”) restoring ACICS’s recognition. Consistent with the District Court’s Opinion, Secretary DeVos also initiated a review of materials previously submitted by ACICS in its May 2016 Part II submission (“Part II submission”) which were not considered by the Department staff, the National Advisory Committee on Institutional Quality and Integrity (“NACIQI,”) the Senior Department Official (SDO), or Secretary King in connection with the December 2016 Decision.

By the terms of that April 2018 Order, ACICS is permitted to provide additional relevant evidence and explanation regarding the Part II submission. (April 2018 Order at 2). Specifically, ACICS provides this explanation to the Department regarding whether, and to what extent, the documents and narrative submitted to the Department in its Part II submission are relevant to demonstrating that substantial evidence exists that it has been compliant with the criteria deemed deficient in the Department’s 2016 Final Staff Report (“2016 Final Staff Report”) on which the December 2016 Decision was based or, alternatively, that ACICS had the ability to come into compliance within 12 months.

All exhibits referenced below, unless otherwise indicated, are those previously filed with the Part II submission which is incorporated here by reference.

II. Relevance of Part II Submission

The narrative and documents in the Part II submission, as detailed on a criteria-by-criteria basis below, were and are directly relevant to demonstrating that substantial evidence existed as to ACICS compliance with the twenty-one (21) criteria erroneously deemed deficient in the Department’s 2016 Final Staff Report on which the December 2016 Decision was based or, alternatively, that ACICS had the ability to come into compliance within 12 months.

Specifically, the Part II submission that was not considered in the 2016 Final Staff Report and December 2016 Decision responded directly to the central tenets of the relevant criteria and also the Department’s own supplemental requests for additional information from ACICS about compliance with most of those 21 criteria. The 2016 Final Staff Report and December 2016 Decision, therefore, failed to take into consideration relevant and

substantial evidence of compliance by ACICS. The Secretary should have concluded in 2016 that ACICS was in compliance with each of the 21 criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months.¹

III. Explanation – Part II Submission and Recognition Criteria

1. 34 C.F.R. § 602.13 -- Acceptance of the Agency by Others

The Part II submission documents and narrative explanation are relevant to demonstrating that substantial evidence existed as to ACICS's compliance with this criteria or its ability to come into compliance within 12 months. In fact, the Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's inquiry into compliance with this criteria. The question posed by the Department was:

602.13 acceptance of the agency by others How has the number of major investigations into and actions against so many of ACICS's schools (CEC, Corinthian, ITT, MJI, Westwood, Lincoln Tech) by multiple federal agencies and states, plus the Congressional inquiry, affected ACICS's public acceptance and credibility? What actions have you taken in response?

In the Part II submission to the Department in May 2016, ACICS acknowledged the severity of the governmental inquiries into the operations of member institutions over the last several years. Notwithstanding these inquiries, ACICS identified the ways in which it maintained and improved its compliance with this criteria.

First, ACICS reported that the inquiries resulted in increased frequency and intensity with which ACICS interacted and exchanged information with other oversight partners, including state governments, federal agencies, and Congress, efforts which had worked to establish and strengthen positive relationships between ACICS and a variety of external stakeholders. ACICS also reported that despite the public scrutiny applied to ACICS institutions during this time, the agency continued to serve as a reliable resource for quality assurance for state licensing authorities, other accrediting agencies, international ministries of education, evaluators, employers, and educational institutions, providing exhibits evidencing such acceptance including: Exhibit 13: CHEA ACICS recognition granted Sep. 2012; Exhibit 14: ACICS Recognition by ARRT, January 27, 2015; Exhibit 15: International Ministries of Higher Education, Notification of Accreditation, December 2015.

Second, ACICS also presented narrative and documentary evidence in the Part II submission that it had voluntarily sought and received independent review of its effectiveness as

¹ ACICS submissions to the Department following the 2016 Final Staff Report also include discussion of the factual basis on which the Secretary should have concluded ACICS was compliant with the 21 criteria or could have come into compliance within 12 months. See July 5, 2016 (ACICS Comment to SDO); July 25, 2016 (ACICS Response to OPE); October 4, 2016 (Request for Reconsideration); and October 21, 2016 (ACICS Appeal to Secretary).

ACICS Part II Submission Explanation (May 2018)

an accrediting agency by a variety of well-respected accreditation authorities, detailed in table form:

Table B:

Inventory of Accountability Reviews of ACICS, 2006 through 2016

HOW:	WHEN:	OUTCOME:
Self-evaluation reviewed by CHEA	2007	Recognition continued through December 2011.
Self-study reviewed by NLNAC Board	2008	Recognition: ACICS schools eligible for NLNAC specialized accreditation.
Self-evaluation reviewed by THECB Board	2009	Recognition: ACICS colleges retain eligibility to offer degree programs in Texas.
Self-evaluation; observation of Council; observation of school review; ED staff report, NACIQI review	2011	Compliance report required on 13 issues; recognition extended pending receipt of report.
Self-evaluation; observation of Council; review by CHEA Committee on Recognition (COR)	2011	Compliance report on one issue; recognition extended one year.
Compliance report and CHEA Board review	2012	Recognition granted through 2016.
ED Compliance report	2013	Recognition granted through December 2016.
Self-evaluation and review by ARRT Board	2015	Recognition: graduates of ACICS schools w/RT programs eligible for certification, licensure.
Self-evaluation reviewed by CHEA COR	2015	Eligibility affirmed; process for recognition commences.
Self-evaluation; observation of Council; observation of school review; ED staff report, NACIQI review	2016	Pending.

Self-evaluation; observation of Council; 2016 review by CHEA Committee on Recognition (COR)

Deferral; report due Fall 2016.

Third, ACICS also reported to the Department that, at the time, it was receiving regular inquiries from as many as 20 institutions each month seeking initial accreditation through submission of an Eligibility Self-Assessment Checklist and that more than 115 institutional representatives from many regions within the United States and abroad participated in the ACICS Initial Accreditation Workshops during 2015. ACICS stated that it applies rigorous standards in screening initial applicants, evidenced in the fact that only a fraction of the institutions that applied were granted initial accreditation.

ACICS further stated that in a typical year, more institutions are granted initial accreditation than those who withdraw or lose their accreditation and provided that data in Table A, stating that these numbers reflected at the time a continuing interest on the part of institutions in the U.S. and abroad in gaining an ACICS accreditation, evidencing ACICS’s acceptance as an accrediting agency nationally and internationally.

Table A:

Year	Number of voluntary withdrawals	Number of Initials
2015	14	30
2014	14	19
2013	18	21
2012	12	19
Total	58	89

Fourth, ACICS reported to the Department that it had strengthened its standards and applied more rigorous requirements on member institutions over the previous five years and that was reflected in the number of institutions who had received a negative Council action and the increased number of institutions that were then under heightened monitoring by the agency, as is provided in Table C:

Table C:

Action	Totals	2015 (Jan-Nov)	2014	2013	2012	2011
Show Cause Directive/Probation	106	11	8	3	11	73
Action to Withdraw	4	0	0	1	3	0
Denials	10	0	3	1	2	4
Revocations	41	10	20	11	0	0
Debarments	6	0	4	2	0	0

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Institution Closings	126	37	40	27	19	3
Voluntary Withdrawals	54	15	14	18	5	2
Campuses placed on heightened monitoring for student achievement*	553	120	113	120	182	138
Campuses placed on heightened monitoring for financial stability reasons	254	91	79	34	25	25

**Includes institutions with placement and retention rates below Council Standards*

Fifth, ACICS reported that, as indicated in the agency’s response to Part I of the Department’s inquiry, ACICS had monitored all of the adverse cases listed in the Department’s inquiry and had corresponded with each institution (Exhibit 121: Table A; Exhibits 153-160: Adverse letters, responses). It reported that the following institutions continued at that time to be under heightened monitoring by the Council with the institutions under a show-cause directive: ITT Technical Institute, Michigan Jewish Institute, Everest Institutions (then structured under Zenith Education Group).

Sixth, ACICS also reported that it had actively responded to requests for information from Congress, had regularly met with representatives of Congressional offices to keep policy makers fully informed of the developments regarding accreditation of ACICS member institutions, and maintained an active dialogue about improvements that could be made to ensure that students derive value from their education. ACICS further stated that it had cooperated fully in the discovery phase of multiple inquiries and investigations of accredited institutions made by state and federal authorities. Between September 2011 and February 2016, ACICS reported that it had responded to 28 requests for information from state Attorneys General, spent over 800 hours to collect and provide nearly 500,000 pages of supportive information. In addition, during the same time period, the agency reported that it had responded to 12 investigative demands for information from federal agencies, including the Federal Trade Commission, the Department of Education, Department of Justice, Securities and Exchange Commission, and the Department of Homeland Security. To fulfill these requests, the agency stated that it spent over 450 hours collecting and providing federal agencies with over 440,000 pages of information (Exhibit 138: Inventory of Subpoena Requests, 2010-2016).

The above information is directly responsive to the Department’s inquiry related to demonstrating continued wide acceptance as an accrediting agency and actions taken against named schools, and specifically responsive to the Department’s concerns about positive working relationships with state and federal agencies and wide acceptance as noted in the 2016 Final Staff Report.

In addition, with regard to the Department's concerns regarding reliable placement rate and licensing exam passage rate standards as a measure of wide acceptance by employers and others, ACICS reported that it had and was undertaking a study to understand best practices for assessing and verifying institutional performance data, citing research commissioned from two expert researchers and observers of higher education trends. (Exhibit 140: Improving the U.S. Department's Performance Data by Accreditor Dataset: A Synopsis of Two ACICS White Papers).

With regard to license passage rate standards, the history of ACICS's compliant standards in this area and current policy is discussed in **Exhibit A-O-1, the ACICS Licensure Pass Rate Report (2018)** and in **Exhibit B-O** at 602.16(a)(1)(i).

With regard to placement rates, at the time of the Part II submission, ACICS was similarly undertaking a study to understand best practices for assessing and verifying placement data, which ultimately resulted in the steps taken to date as detailed in **Exhibit A-O-2, the ACICS Placement Verification Program Report (2018)**. As noted in that Report, ACICS was required to, and did, undertake a significant consultative process with its members and experts about the form that its current Placement Verification Program (PVP) program takes, a deliberative process which was necessary, if not required, by the Department's mandate that agencies have student achievement standards that are appropriate and fair. See 34 C.F.R. §§ 602.16(a)(1)(i); 602.25.

The December 2016 Decision included no analysis by the Secretary as to why ACICS was non-compliant with 602.13 and deferred completely to the 2016 Final Staff Report. However, the information submitted by ACICS in the Part II submission was directly responsive to the Department's request for additional information regarding compliance with this criteria, and was not addressed in either the 2016 Final Staff Report or December 2016 Decision. The Secretary should have concluded in 2016 that ACICS was compliant with this criteria or, alternatively, that ACICS could have come into compliance within 12 months.

2. 34 C.F.R. § 602.15 -- Administrative and Fiscal Responsibilities

The Part II submission documents and narrative explanation are relevant to demonstrating that substantial evidence exists as to ACICS's compliance with this criteria or its ability to come into compliance within 12 months. Specifically, the Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's own inquiry:

602.15(a)(1) staffing/financial resources Are you confident in the number and expertise of your staff and institutional review teams, and in the level of your financial resources? Any changes you have made or plan to make?

... provide all instances in which you have changed your reviewers or provided your reviewers with information to focus their review based upon this information.

In the Part II submission, ACICS provided in Tables D-G detailed evidence of its compliance with this criteria, namely: (1) information regarding the sufficiency of its staff to manage the cycle of required agency site visits (Table D); (2) the adaptation of ACICS to match evaluator expertise with changes in programs offered by ACICS members (Table E); (3) a breakdown of the number and timing of staff training held by ACICS (Table F); and (4) evaluator performance review criteria used by ACICS (Table G). ACICS stated that it was confident that the number and expertise of its regular staff and institutional evaluators were more than adequate for the number of institutions reviewed, and that the financial resources allocated to support the accreditation activity were adequate. ACICS further explained that the Board has responsibility for ensuring that the accreditation activity is adequately funded, staffed and led by professionals with appropriate experience, training and expertise to consistently and effectively apply the Council's accreditation standards.

ACICS reported that, at the time, staff consisted of 39 individuals and a pool of more than 1,900 trained, qualified on-site volunteer evaluators. Approximately 50 percent of the staff at that time were dedicated to the recurring review of institutions through site visits and document reviews. Accreditation coordinators, then and now, are required to have at least a bachelor's degree. At that time, 68 percent of the accreditation coordinators held graduate degrees, including doctoral degrees. All staff are vetted and trained, then as now, so that they are able to understand and interpret Council standards, to effectively coordinate on-site evaluation teams, and to communicate effectively in writing and verbally.

ACICS explained that the allocation of resources to meet the demand for accreditation services was accomplished through the annual budgeting process. For the then-current fiscal year (2016), ACICS reported that the accreditation workload (475 visit projects, 665 program reviews, 870 annual accountability report reviews) was funded by an operating budget of more than \$11 million and supported by a reserve fund in excess of \$13 million. As evidenced, the budget- then as now- provided sufficient allocations to meet the demand for accreditation services.

The Part II submission stated that the number of institutions undergoing on-site evaluations each year varied depending upon the expiration of grant length, the number of quality monitoring visits and the number of special or unannounced visits. However, ACICS explained that it was confident of the sufficiency of staffing capacity to handle on-site evaluations and other demands. See Table D. ACICS also explained its training protocol to ensure that all staff and evaluators are able to understand, interpret, and apply Council standards, to coordinate effectively as part of on-site evaluation teams, and to communicate effectively in writing and verbally. ACICS stated that it removed from the active roster evaluators who they had assessed to be incompetent or have demonstrated inappropriate behavior. Procedures also include identifying "areas of need" for recruitment of new evaluators. New evaluator recruitment, enhancement of evaluator training, and expanded evaluator performance protocol were reported as ongoing and were summarized in Tables E, F, and G.

Taken together, the Part II submission documents and narrative are relevant to demonstrating that substantial evidence existed as to ACICS's compliance with this criteria or its ability to come into compliance within 12 months. The Part II submission that was not

considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's inquiry into compliance with this criteria.

The December 2016 Decision included no analysis by the Secretary as to why ACICS was non-compliant with 602.15(a)(1) and deferred completely to the 2016 Final Staff Report. However, the information submitted by ACICS in the Part II submission was directly responsive to the Department's request for additional information regarding compliance with this criteria. The Secretary should have concluded in 2016 that ACICS was compliant with this criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months. See also **Exhibit B-O** at 602.15 discussion.

3. 34 C.F.R. § 602.16(a)(1)(i) – Accreditation and Pre-accreditation Standards – Student Achievement

The Part II submission narrative and documentary evidence are relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. Specifically, the Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's own inquiry:

602.16(a)(1)(i) student achievement – Given what's happened with Corinthian, CEC, ITT, MJI, Westwood, and Lincoln Tech related to inaccurate student achievement data, what were the shortcomings in your process of verifying those data and how are you changing the process to prevent this from happening in the future? How did these issues occur despite ACICS's 2012-2013 move to require independent verification and auditing of student achievement data? Do you define retention as completion of the current academic year, rather than return for a subsequent term, even if a program may typically require over 12 months to complete. Is this different from other agencies' methods of calculating retention for programs over 12 months in length? If so, why do you measure retention this way?

In the Part II submission, ACICS confirmed significant changes to the assessment of student achievement and provided evidence and explanation of compliance with this criteria. One key change described by ACICS was its imposition of a heightened requirement that, on a case-by-case basis, schools would be required to submit independent verification of placement data. As a matter of record, ACICS initiated a review of the data verification process in 2011. Development of the PVP is the end result of the iterative process employed by ACICS to fully address issues of placement data integrity. As an earlier example, when one major multi-campus system disclosed irregularities in the reporting of placement data to ACICS, the Council issued a show-cause directive and required the multi-campus system, at its own expense, to submit for Council review independent verification of all of the previous year's placement data.

In addition to the Council requiring independent verification of placement data on a case-by-case basis, ACICS reported that it had fortified its system of testing data integrity in the following ways at that time: 1) ACICS's Placement Verification Program (PVP) tested a minimum of 20 percent of member institutions each year for intensive scrutiny of their placement data; 2) ACICS added a dedicated student achievement data evaluator assigned to that

task on every site visit; and 3) ACICS implemented and applied a data integrity test to the campus data when it is uploaded annually into the ACICS IT platform. Initially, the system focused on verifying a 20% sample of placement data from randomly selected campuses, particularly those that exhibited increased risks (based on outcomes, complaints, external information). ACICS reported that this randomized sample, coupled with the review of at-risk institutions through the At Risk Institution Group (ARIG) improved upon the prior system. ACICS stated that these data integrity improvements reflected substantial investment of time and resources into improving its data verification procedures in compliance with this criteria. Further, since the time of the Part II Supplement and as noted throughout this submission, the Placement Verification Process has been fully implemented. See Exhibit A-O-2 (ACICS Placement Verification Program Report (2018)).

In addition, ACICS reported that, at the time, the dedicated student achievement evaluator conducted up to 100% verification of all graduates reported as placed and of all graduates who were classified as not available for placement. (See Part II submission at Exhibit 125: Memorandum to the Field, April 2016). Calls were made to graduates and/or employers. Any campus receiving a finding of inaccurate student achievement placement data was required to submit its Campus Accountability Report (CAR) data for intensive verification. This verification procedure in place at the time further demonstrates ACICS's compliance with this criteria.

ACICS also reported that based on these enhancements to ACICS's data testing protocols, the Council had substantially greater confidence that student achievement data that it received each year was a reasonable representation of actual performance. When data reported on the CAR was found to be incorrect, the campus was required to pay a fee and resubmit a revised CAR. The Council reviewed any such finding during the file review process and verified that the correction had been made.

Importantly, as noted above, ACICS described, but the Department failed to consider, its enhanced efforts to measure student achievement by means of placement rates. ACICS detailed its significant investment at that time to improve monitoring processes, which ultimately resulted in the ACICS Placement Verification Program Report (2018), see Exhibit A-O-2. This Report details ACICS's continued positive results in student achievement verification and further evidences ACICS's compliance with this criteria.

With regard to its retention rate standard, ACICS reported that for several decades, ACICS had required institutions to track and report retention rates as part of its Campus Effectiveness Plan. This concept is closely tied to the 'Satisfactory Academic Progress' policy required by the Department's regulations. ACICS explained that it defines retention as completion of a CAR year, July 1st- June 30th. The method of calculating retention at the program-level is the same regardless of program length. Other accrediting agencies such as The Accrediting Bureau of Health Education Schools ("ABHES") and the Accrediting Commission of Career Schools and Colleges ("ACCSC") utilize retention as a measurement of student achievement and apply different methodologies for calculating program retention. However, ACICS stated that those agencies' methods are comparable to the ACICS method, as neither agency calculates retention differently for programs over 12 months in length.

In the December 2016 Decision, the Secretary agreed with the Department staff that “not only was this one of the most significant areas of deficiency identified, but despite ACICS’s assertions of progress in other areas, its progress in developing and effectively implementing student achievement standards was entirely lacking or incoherent” and that it “has not put forward a plan to effectively develop and apply standards for evaluating student achievement.” December 2016 Decision, at 6-7. However, this conclusion failed to account for the detailed explanation in the Part II submission in which ACICS reported fully on the status of its enhancements to its placement data verification protocols. Any such incoherence, therefore, was the result of the Department failing to properly evaluate the responses ACICS provided in the Part II submission that were directly responsive to the Department’s inquiries. Those enhancements have ultimately resulted in ACICS’s current systemic processes and procedures, and have continued to show positive results and evidence of compliance with this criteria. As stated, these results and the current PVP system are further detailed in **Exhibit A-O-2**.

In sum, the information submitted by ACICS in the Part II submission was directly responsive to ACICS’s compliance with this criteria, including the Department’s request for additional information. Viewing this evidence and narrative as a whole, the Secretary should have concluded in 2016 that ACICS was compliant with this criteria at that time or, alternatively, that ACICS was making significant progress in coming into compliance within 12 months. See also **Exhibit B-O**, at 602.16(a)(1)(i) discussion.

4. **34 C.F.R. § 602.16(a)(1)(v) - Accreditation and Pre-accreditation Standards: Fiscal/ Administrative Capacity**

This criteria was not addressed in the Department’s questions that were subject of the Part II submission. See **Exhibit B-O**, at 602.16(a)(1)(v) discussion.

5. **34 C.F.R. § 602.16(a)(1)(vii) - Accreditation and Pre-accreditation Standards: Recruiting**

The narrative explanation and documentary evidence ACICS provided in the Part II submission are relevant to demonstrating substantial evidence of ACICS’s compliance with this criteria or its ability to come into compliance within 12 months. Specifically, the Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department’s own inquiry:

602.16(a)(1)(vii) recruiting and 602.26 notification of accrediting decisions – Provide Documentation about each instance of an issue with recruiting practices or advertising for Corinthian schools, ITT, MJI, Westwood, Lincoln Tech, and Globe, and Documentation indicating whether or when you notified the Department. For each of these instances, please provide all emails among, and Documents sent or received by, any of ACICS directors, officers, staff members, consultants (including all members of college review teams), and third parties which concern those schools, for the following time periods:

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- *Corinthian Schools: from January 1, 2014, to the present.*
- *ITT: From November 1, 2013, to the present*
- *Westwood: from November 1, 2011, to the present*
- *Lincoln Tech: from July 1, 2014 to the present*
- *Globe: from July 1, 2014 to the present*
- *Le Cordon Bleu: February 1, 2013 to the present*

And: are you changing your policies and practices in any way given these issues?

In the Part II submission, ACICS responded to Department concerns and provided documentation and explanation regarding issues related to recruiting practices and advertising for Corinthian schools, ITT, MJL, Westwood, Lincoln Tech, and Globe. ACICS analyzed in-depth the incidence of deficiencies regarding recruitment, admissions, advertising and marketing derived from team reports, complaints, adverse and other sources. In response, and as detailed in the Part II submission, ACICS adopted a more prescriptive standard for recruitment and admissions effective July 1, 2016. ACICS explained that the revised standard requires institutions to ensure that any person or entity engaged in recruitment activities is communicating current and accurate information, among other items of student achievement disclosures. ACICS also explained that the institution was required to present for review during on-site visits written documentation that demonstrates that it is systematically monitoring the recruiting and admissions activities.

Further, ACICS described how it had developed updated visit templates for on-site evaluation teams to test for compliance with this requirement. ACICS explained that these revamped templates were applied during the Fall 2016 review cycle. Evidence of these changes and the application of the new methodology were provided in the Part II submission. Specifically, Exhibit 148 illustrates the use of the updated visit template and the corresponding findings with regards to Everest College. Based on the information discovered, ACICS issued a probation order for student achievement. See Exhibits 165 – 177 (Emails) and Exhibits 147-148: Team Reports, Institutional Responses and Council Actions for Institutions.

In the December 2016 Decision, the Secretary's concern regarding 602.16 centered on student achievement data verification. See December 2016 Decision, at 6-7; see also Exhibit A-O-2. The Secretary failed, however, to consider ACICS's narrative and documentary evidence demonstrating substantial investment, improvement, and compliance (or the ability to become fully compliant within 12 months) as detailed in the Part II submission. Further, with respect to the aspect of this criteria concerning recruitment, the December 2016 Decision included no analysis by the Secretary as to why ACICS was non-compliant and deferred completely to the 2016 Final Staff Report. The Part II submission documents were directly relevant to demonstrating substantial evidence of ACICS compliance with all aspects of this criteria, including data verification and recruitment practices. The Secretary should have concluded in 2016 that ACICS was compliant with this criteria or, alternatively, that ACICS could have come into compliance within 12 months. See also Exhibit B-O, at 602.16(a)(1)(vii) discussion.

6. 34 C.F.R. § 602.16(a)(1)(ix) - Accreditation and Preaccreditation Standards: Student Complaints

Although the Department did not direct a specific question to ACICS for this criteria, ACICS's Part II submission addressed how ACICS incorporates student and other complaints into its processes and decisions, see infra, discussion regarding Part II submission responses to 602.16(a)(1)(vii), 602.20(a), (b), and 602.21(a),(b).

Although the December 2016 Decision did not focus specifically on this criteria, it nonetheless failed to consider ACICS's evidence directly relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. The Secretary should have concluded in 2016 that ACICS was compliant with this criteria or, alternatively, that ACICS could have come into compliance within 12 months. See also Exhibit B-O, 602.16(a)(1)(ix) discussion.

7. 34 C.F.R. § 602.16(a)(1)(x) - Accreditation and Preaccreditation Standards: Title IV Responsibilities

ACICS's narrative explanation and documentary evidence presented in the Part II submission are relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. Specifically, the Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's own inquiry:

602.16(a)(1)(x) - Title IV responsibilities and 602.19(b) monitoring Provide Documentation, including all communications and analyses, of when you had reason to believe and when you notified the Department of each instance that a Corinthian school, ITT, CEC, and MJJ, had violated its Title IV responsibilities or engaged in fraud or abuse.

In the Part II submission, ACICS confirmed that it takes seriously its responsibility as an oversight partner with the Department's Federal Student Aid (FSA) division. ACICS stated that it had formally established procedures and protocols to test for compliance with the expectations of the Department in connection with federal student aid regulations. It described that the on-site evaluation review of Title IV-related items includes a review of the last audit by the Program Participation Team to determine if they had any questions or concerns with the institution's practices with the administration of federal financial aid. See Exhibits 147 to 159.

In addition, ACICS described that the standard team report template has as many as 84 questions that are directly or indirectly related to Title IV compliance. ACICS explained that while a majority of these compliance questions are addressed by the Student Relations evaluator, who has some expertise in the administration of student financial aid, other questions (such as academic credit analysis, distance education regulations, and verification of retention and placement data) are addressed by program specialists, distance education specialists, or the educational activities specialists. Id.

Importantly, ACICS explained that it reviews the appropriate application of standards of satisfactory academic progress through the qualitative and quantitative measurements, consistent with Title IV regulatory requirements, to ensure that students' progress is accurately tracked and, if necessary, financial aid funds are not being inappropriately disbursed. ACICS stated that it reviews the qualifications and expertise of financial aid administrators to ensure that they are capable of applying the Department's regulations. The institution's conversion of contact hours to credit is evaluated through its class schedules, time cards for externship hours, and interviews with students. Id.

The December 2016 Decision included no analysis by the Secretary as to why ACICS was non-compliant with respect to the Title IV responsibilities implicated by this criteria. The Part II submission narrative and documents were directly relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. In addition to the Part II submission, ACICS is also submitting additional narrative and evidence regarding its important Title IV gatekeeping function. See **Exhibit B-O**, at 602.16(a)(1)(x) discussion. The Part II submission and ACICS's additional supplementary evidence readily demonstrate that ACICS was compliant with this criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months.

8. 34 C.F.R. § 602.17(a) - Application of Standards in Reaching an Accrediting Decision

The Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's concern as stated in the 2016 Final Staff Report:

§602.17(a) The agency must clarify its policies and procedures relative to its new data integrity standards and new team reviewer. The agency must also demonstrate that it has applied these standards. (For example, in a site visit report)

Further, the Part II submission responded to this question posed by the Department:

Per 602.17 and 602.18, how do you verify information provided by a school?

In its Part II submission, ACICS acknowledged that it was aware of historical deficiencies in the integrity of self-reported data by member institutions particularly related to placement outcomes. As a matter of record, ACICS initiated a review of the data verification process in 2011. Development of the current PVP system, see **Exhibit A-O-2**, is the end result of the iterative process employed by ACICS to fully address issues of data integrity. As an earlier example, ACICS reported in the Part II submission that when one major multi-campus system disclosed irregularities in the reporting of placement data to ACICS, the Council issued a show-cause directive and required the multi-campus system, at its own expense, to submit for Council review independent verification of all of the previous year's placement data. ACICS explained that the show-cause directive and independent verification imposed on that multi-campus system served as a springboard for new reforms, the implementation of which were detailed in the Part II submission. ACICS confirmed that the related ACICS's policies and

procedures called for verification of an institution's compliance with approved program offerings, credit hour analysis, out-of-class educational activity, standards of satisfactory academic progress, enrollment agreements, institutional disclosures, institutional publications, and other areas. Further, ACICS demonstrated that it had applied these standards by providing examples from ACICS institutions in the Part II submission exhibits. Specifically, ACICS presented self-studies and required attachments CEC, ITT, Westwood, Lincoln Tech, Globe University and Le Cordon Bleu at Exhibits 146 (a) and 146 (b).

ACICS described the verification process and requirements in place at the time of the Part II submission. The agency explained that, at the time, a dedicated student achievement evaluator conducted up to 100% verification of all graduates reported as placed and of all graduates who were classified as not available for placement. In the April 2016 Memorandum to the Field, as submitted with the Part II supplement, ACICS proposed a new standard to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council sought to identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data. The effective date of the proposed policy change was July 1, 2016. The new standard read:

3-1-203. Data Integrity.

All performance and institutional data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance, which is subject to review for integrity, accuracy, and completeness. The Council has the discretion to independently review performance data upon which it relies, in part, on making an accrediting decision. to revise the definition of placement. See Exhibit 125:

Memorandum to the Field, April 2016.

As part of this verification process, ACICS evaluators called graduates and/or employers. Any campus receiving a finding of inaccurate student achievement placement data was required to submit its CAR data for intensive verification. When data reported on the CAR was found to be incorrect, the campus was required to pay a fee and resubmit a revised CAR. The Council further reviewed that finding during the file review process and verified that the correction had been made.

ACICS reported to the Department the materials that are required from the institutions prior to a review include:

- An application for renewal of accreditation or substantive change
- Institutional self-study
- School catalog
- Copy of the Campus Effectiveness Plan
- State authorization
- Academic credit analysis
- Syllabi for new programs
- Campus Accountability Report

ACICS Part II Submission Explanation (May 2018)

- Annual Financial Report

Further, ACICS confirmed that on-site evaluation teams have access to the following documents at least two weeks prior to a visit:

- An update on self-study
- Faculty and staff rosters, including qualifications
- List of approved programs
- Syllabi (on-site and electronic access in some cases)
- Access to distance education courses (where applicable)
- Academic Credit Analysis

As detailed in the Part II submission, in addition to the Council requiring independent verification of placement data on a case-by-case basis, ACICS described that it fortified its system of testing data integrity in the following ways:

1. Placement verification program which tests a minimum of 20 percent of member institutions each year for intensive scrutiny of their placement data;
2. A dedicated student achievement data evaluator assigned to that task on every site visit; and
3. A data integrity test that is applied when the campus data is uploaded into the ACICS IT platform annually.

Based on these enhancements to ACICS's data testing protocols, the evidence supported the Council's representation that it had substantially greater confidence that the student achievement data it received each year is a reasonable representation of actual performance.

ACICS also explained that, historically, as part of its annual data collection process, ACICS had conducted statistical analysis of the placement outcomes of all its institutions, focusing on the average placement rate, as well as the standard deviations from the mean to determine the spread of the outcomes across all schools and to identify trends that present "at risk" institutions. The results of the analysis varied from year to year and was sometimes affected, in part, by external factors beyond the control of the institutions such as local economic changes (as in the Midwest), and changes in licensure/certification testing requirements.

In the development of a more reliable system, the Council directed the inclusion of a "data integrity reviewer" on every full team site visit, the purpose of which was to focus primarily on the reliability of the placement information reported by institutions on the Campus Accountability Report. With the support of the subject matter experts on the team, the data integrity reviewer was responsible for attempting to contact, via telephone, up to 100% of all graduates reported as placed. The subject matter experts provided practical input on the appropriateness of the placement as disclosed by the campus and confirmed by the graduate or employer. It was also this individual's responsibility to confirm that acceptable documentation was on file for all graduates classified as not available for placement on the CAR.

ACICS also explained that it had implemented the PVP system, explaining that institutions submit graduate placement information to the system. Once the placement data has been successfully uploaded to the system, emails are automatically and instantaneously sent to the graduates and employers using a unique template depending on the language and placement type selected that requests verification of the information provided by the campus. The adoption of the PVP process expanded the existing DIR process and is detailed in **Exhibit A-O-2**.

In the Part II submission, ACICS provided substantial evidence of its compliance with this criteria or its ability to come into compliance within 12 months. The Secretary should have concluded in 2016 that ACICS was compliant with this criteria or, alternatively, that ACICS could have come into compliance within 12 months. See also Exhibit B-O, at 602.17(a) discussion.

9. 34 C.F.R. § 602.17(c) - Application of Standards in Reaching an Accrediting Decision: On Site Review

The Part II submission narrative and documentary evidence are relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. The Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's concern as stated in the 2016 Final Staff Report:

§602.17(c) The agency needs to provide evidence that its regular on-site visit process currently and consistently obtains sufficient information to determine if the institution complies with ACICS standards.

The Part II submission also directly responded to the Department's additional request for information:

Per 602.17 ... how do you verify information provided by a school?

Specifically, ACICS confirmed that it conducts on site reviews of institutions as part of its accreditation review. Further, the Council indicated that it had strengthened its process for conducting interim on-site evaluation visits between accreditation renewal periods. ACICS explained that any time it conducted an on-site visit, the evaluation team reviewed an institution's overall effectiveness in key areas such as administrative capability, effectiveness planning, admissions and recruitment practices, recordkeeping, and faculty qualifications. ACICS stated that interim on-site evaluations were also being included as part of the quality assurance monitoring process of the Council.

In addition, as discussed above, ACICS explained that the on-site evaluation review of Title IV-related items includes a review of the last Title IV audit by the Department's Program Participation Team to determine if they had any questions or concerns with the institution's practices with the administration of federal financial aid. In addition, the standard team report template includes as many as 84 questions that are directly or indirectly related to Title IV compliance. ACICS stated that although a majority of these compliance questions are addressed by the Student Relations evaluator, who has expertise in the administration of student financial

aid, ACICS explained that other questions (such as academic credit analysis, distance education regulations, and verification of retention and placement data) are addressed by program specialists, distance education specialists, or the educational activities specialists.

Further, in the Part II submission ACICS described the on-site evaluation teams and the on-site evaluation review. On-site evaluation teams, ACICS explained, have access to the following documents at least two weeks prior to a visit:

- An update on self-study
- Faculty and staff rosters, including qualifications
- List of approved programs
- Syllabi (on-site and electronic access in some cases)
- Access to distance education courses (where applicable)
- Academic Credit Analysis

The documents noted above and provided to the evaluation team ensure that the regular on-site visit process currently and consistently produces sufficient information to determine if the institution complies with the ACICS standards. With the successful implementation of the PVP, ACICS verifies the data provided by the institution and only those graduates that have been validated can be reported as placed on the CAR. This demonstrates ACICS's compliance with the requirements of 602.17(c).

In the Part II submission, ACICS provided substantial evidence of its compliance with this criteria or its ability to come into compliance within 12 months. The Secretary should have concluded in 2016 that ACICS was compliant with this criteria or, alternatively, that ACICS could have come into compliance within 12 months. See also **Exhibit B-O**, at 602.17(c) discussion.

10. 34 C.F.R. § 602.18(d) – Reasonable Assurance of Accurate Information

The Part II submission narrative and documentary evidence are relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. The Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's concern as stated in the 2016 Final Staff Report:

§602.18(d) The agency must have a reasonable basis for determining that the information it relies on for making accrediting decisions is accurate. The agency must clarify how the agency holds institutions accountable for ensuring integrity in their data submissions and explain their verification processes. The agency must provide documentation demonstrating that they have applied their standards (such as an onsite visit report).

The Part II submission also responded to a supplemental question posed by the Department:

Per 602.18 ... how do you verify information provided by a school?

In the 2016 Final Staff Report, staff acknowledged that the agency instituted a Placement Verification Program to randomly call employers to see if the information provided by selected institutions was reasonably accurate, but raised concerns that the agency had an inadequate process and provided insufficient resources to accomplish its purpose. Further, staff noted that based on the widespread placement rate falsification discussed in Section 602.16(a)(1)(i), it had determined that the agency was not in compliance § 602.18(d).

In its Part II submission, however, ACICS acknowledged that it was aware of deficiencies in the integrity of self-reported data by member institutions, particularly related to placement outcomes. To address these concerns, ACICS explained that its policies and procedures call for verification of an institution's compliance with approved program offerings, credit hour analysis, out-of-class educational activity, standards of satisfactory academic progress, enrollment agreements, institutional disclosures, institutional publications, among other requirements. To demonstrate how ACICS implemented this verification process, the Part II submission set forth the materials ACICS required from institutions prior to an on-site review, including: an application for a renewal of accreditation or substantive change, an institutional self-study, a school catalog, a copy of the Campus Effectiveness Plan, State authorization documentation, an academic credit analysis, syllabi for new programs, a campus accountability report, and annual financial reports. Furthermore, the Part II submission stated that the on-site evaluation teams have access to the following documents at least two weeks prior to a visit: an update on self-study, faculty and staff rosters (including qualifications), a list of approved programs, syllabi (on-site and electronic access in some cases), access to distance education courses (where applicable), and academic credit analysis.

To demonstrate the efficacy and sufficiency of this system for ensuring accuracy of the institution-submitted data and information, in the Part II submission ACICS provided in Exhibits 146(a) and 146(b). These exhibits provided an example of the comprehensive set of materials that are required from institutions prior to a review and on-site evaluation. The variety and robust nature of the on-site evaluator's review of this information supports ACICS's compliance with this criteria.

Also relevant to this criteria is ACICS's fortification of its system of testing data integrity in the following ways. As described above, ACICS describe in its Part II submission narrative the various ways in which it had strengthened its data-integrity processes and procedures, including: (1) enhanced algorithms within ACICS's Placement Verification Program that intensely scrutinizes placement data for a minimum of 20 percent of member institutions each year; (2) a dedicated student achievement data evaluator assigned to scrutinize placement data during every site visit; and (3) expanded application of a data integrity test to each institutions annual campus data submission.

Further, ACICS's Part II submission described the verification process and requirements in place at the time. ACICS explained that the dedicated student achievement evaluator conducted verification of all graduates reported as placed and of all graduates who were classified as not available for placement. See Exhibit 125: Memorandum to the Field, April 2016. This verification step entailed ACICS evaluators contacting graduates and/or employers to verify employment. With respect to data, ACICS stated that any campus receiving a finding of

inaccurate student achievement placement data was required to submit its CAR data for intensive verification. When data reported on the CAR was found to be incorrect, the campus was required to pay a fee and resubmit a revised CAR. The Council further reviewed that finding during the file review process and verified that the correction has been made. This robust data verification process supports the conclusion that ACICS was compliant with this criteria, or, alternatively, could have become fully compliant within twelve months.

These enhancements to ACICS's data testing protocols supported the Council's representation that it had substantially greater confidence that the student achievement data it receives each year is a reasonable representation of actual performance.

ACICS further reported that historically, as part of its annual data collection process, ACICS conducted statistical analysis of the placement outcomes of all its institutions, focusing on the average placement rate, as well as the standard deviations from the mean to determine the spread of the outcomes across all schools and to identify trends that present "at risk" institutions. The results of the analysis varied from year to year and was sometimes affected, in part, by external factors beyond the control of the institutions such as local economic changes (as in the Midwest), and changes in licensure/certification testing requirements.

In the development of a more reliable system, ACICS reported that the Council directed the inclusion of a "data integrity reviewer" on every full team site visit, the purpose of which was to focus primarily on the reliability of the placement information reported by institutions on the Campus Accountability Report. ACICS explained that with the support of the subject matter experts on the team, the data integrity reviewer was responsible for attempting to contact, via telephone, up to 100% of all graduates reported as placed. The subject matter experts provided practical input on the appropriateness of the placement as disclosed by the campus and confirmed by the graduate or employer. It was also this individual's responsibility to confirm that acceptable documentation was on file for all graduates classified as not available for placement on the CAR.

In the final stage of development, ACICS has now fully implemented the PVP system. Institutions submit graduate placement information to the system. Once the placement data has been successfully uploaded to the system, emails are automatically and instantaneously sent to the graduates and employers using a unique template depending on the language and placement type selected that requests verification of the information provided by the campus. The adoption of the PVP process expanded the existing DIR process and is detailed in **Exhibit A-O-2**. Information about the ongoing development of the PVP system was provided with the Part II Supplement.

In the December 2016 Decision, the Secretary did not include a discussion regarding this criteria and deferred to the 2016 Final Staff Report. The Part II submission narrative and documents were directly relevant to demonstrating substantial evidence of ACICS compliance with this criteria or its ability to come into compliance within 12 months, and not properly considered in the December 2016 Decision or 2016 Final Staff Report. The Secretary should have concluded in 2016 that ACICS was compliant with this criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months. See also Exhibit B-O, at 602.18(d) discussion.

11. 34 C.F.R. § 602.19(b) - Monitoring

The Part II submission narrative and documentary evidence are relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. The Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's concern as stated in the 2016 Final Staff Report:

§602.19(b) The agency does not meet the requirements of this section of the criteria. The agency must demonstrate that it could apply revision in such a way as to document effectiveness in monitoring in the time it would be given to respond in a compliance report, particularly in view of its weak record in monitoring and failure to document enforcement. Also, the agency must demonstrate that it provided the appropriate information and documentation of the use of all monitoring mechanisms included in the agency's narrative as requested in the staff draft analysis.

The Part II submission also responded to supplemental request by the Department to provide:

All emails among, and Documents sent or received by, any of ACICS directors, officers, staff members, consultants (including all members of college review teams), and third parties which concern those schools, for the following time periods:

- *Corinthian Schools: from January 1, 2014, to the present.*
- *CEC: from February 1, 2013, to the present*
- *ITT: From November 1, 2013, to the present*
- *MJI: from October 1, 2012, to the present*
- *Westwood: from November 1, 2011, to the present*
- *Lincoln Tech: from July 1, 2014 to the present*
- *Globe: from July 1, 2014 to the present*
- *Le Cordon Bleu: February 1, 2013 to the present*

In the Part II submission, ACICS provided all requested emails evidencing the history of monitoring these institutions (Exhibits 165 – 177: E-mails Sent or Received by ACICS Representatives). The Part II submission also sets forth in detail all of the processes (including on-site evaluation reviews, team reports, specialist evaluations, student interviews) and materials that ACICS requires from institutions for purposes of effectively identifying problems with continued compliance with agency standards, as well as evaluating institutional or program strengths and stability. Furthermore, ACICS explained the reasoning behind its actions as a result of monitoring the specific institutions.

In fact, the Department acknowledged in the 2016 Final Staff Report that ACICS via its narrative and supporting exhibits – other than the Part II submission – had provided information and documentation to describe its process for reviewing data and information it has collected and the manner in which it has identified deficiencies with regards to fiscal information and measures of student achievement. (Exhibit 127: Response to Secretary of Education Letter May 16, 2016 from A. Bieda). The Department explained how the Council monitors and evaluates institutional

performance regarding financial stability, student achievement, excessive growth, substantive changes, and adverse information and complaints through its standing committees and reference that the agency had detailed the process used by the committees involved in the monitoring and evaluation process. Thus, the Department recognized the relevance of this information to this criteria. By extension, the additional information provided in the Part II submission narrative and documents, were directly relevant to demonstrating substantial evidence of ACICS compliance with this criteria or its ability to come into compliance within 12 months.

In considering 34 C.F.R. § 602.19(b), the regulation requires the agency to demonstrate that it has an effective set of monitoring and evaluation approaches supported by data collection and analysis that enable the agency to identify and report problems with institutions' continued compliance. In its application, ACICS described its system in place to comply with this requirement. However, citing multiple substantial settlements agreed to by ACICS-accredited institutions and actions by state attorneys general, Department staff and NACIQI found ACICS's monitoring regime "insufficient to deter widespread misconduct regarding placement, recruiting and admissions." Department staff further found it unlikely ACICS could demonstrate compliance with this requirement in the 12 months it would be allotted to file a compliance report, citing ACICS's "weak record in monitoring and failure to document enforcement," December 2016 Decision, at 7. In turn, the Secretary adopted these findings with little discussion or analysis. *Id.*

However, the Part II submission included voluminous email, including both internal ACICS emails and also correspondence between ACICS and the named schools, detailing extensively the steps ACICS took to monitor and enforce its policies. Examples include the correspondence with Everest and MJI. *See* Exhibits 148 and 165. These emails provided substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. By ignoring this information, the Department and the Secretary failed to consider evidence supporting the conclusion that ACICS was compliant with this criteria or, alternatively, could have become fully compliant within 12 months. In addition, ACICS has continued to make improvements in this area, as detailed in **Exhibit B-O**, at 602.19(b) discussion.

12. 34 C.F.R. § 602.20(a),(b) – Enforcement of Standards

ACICS's Part II submission included detailed narrative as well as documentary evidence concerning its compliance with, or ability to become compliant within 12 months, this criteria. Specifically, the Part II submission responded to the Department's concerns as stated in the 2016 Final Staff Report:

§602.20(a) The agency's response to the documentation requests regarding enforcement of timelines was insufficient. In addition, the agency's proposed language revisions are insufficient and have not been finalized and implemented, and the agency has been ineffective in past efforts to bring itself into compliance. As a result, the agency cannot be found in compliance with the requirements of this section.

§602.20(b) -- The agency's proposed policy language regarding good cause extensions does not include a maximum time period, as requested. In addition, the agency did not

provide the requested documentation demonstrating ACICS took immediate adverse action when an institution did not bring itself into compliance within the specified time period. As a result, the agency cannot be found in compliance with the requirements of this section.

Further, the Part II submission also responded to the Department's supplemental requests:

602.20(a) and (b) - With respect to when you have identified problems in general since January 1, 2013, please provide the total number of institutions or programs you have reviewed off cycle; as well as the number of instances in which you have taken adverse action and the nature of those actions; the number in which you have placed the institution or program on probation or equivalent status; and the number in which you have taken other corrective actions and the nature of those actions.

What is the mean time you actually allowed (including all extensions) for a school to come into compliance under each of 602.20(a)(2)(i), (ii), and (iii)? For each such school, provide the time allowed and break out this data for probation and show cause.

ACICS responded that its off-cycle reviews of institutions were driven by the Council's thorough consideration of a variety of factors, including complaints, adverse information, potential financial instability, student achievement issues or apparent non-compliance with specific standards. To support its compliance with this criteria, ACICS provided examples of such reviews, including:

- Lebanon College April 2013 (Financial as well as academic reasons)
- California International Business University – March 2013 (Financial as well as academic reasons)
- New York Institute of English and Business – March 2013 (Financial)
- Mattia College June 2015 (FACT review focused on institutional operations, student relations, and overall educational activities)
- Brown Mackie College Phoenix and Tucson – October 2015 (review of nursing program as a result of adverse action taken by the AZ Board of Nursing)

In each of these examples, ACICS demonstrated that it conducted a substantive review of the relevant information and required corrective action. The Part II submission also demonstrated the performance of unannounced visits to the following institutions:

- Herguan University – November 2014 (Complaints and adverse information)
- Laurus College – February 2014 and 2016 (Complaints and adverse information)

Through these unannounced visits ACICS conducted a substantive review of the adverse information and the related complaints.

ACICS also detailed how the Council strengthened its process for conducting interim on-site evaluation visits between accreditation-renewal periods. Any time ACICS conducted an on-site visit, ACICS explained, the evaluation team reviewed an institution's overall effectiveness in key areas such as administrative capability, effectiveness planning, admissions and recruitment

practices, recordkeeping, faculty qualifications, and other areas. ACICS explained that interim on-site evaluations are included as part of the quality assurance monitoring process of the Council.

Additionally, ACICS explained that Table E in the Part I submission (Exhibit 121 to the Part II submission: ACICS Response to U. S. Department of Education Supplemental Request for Information 03 03 16) presented an analysis of intervals required to resolve accreditation findings. The summary was representative of all institutions.

ACICS further explained in the Part II submission that the time allotted for institutions to come into compliance was based on the length of the longest program, as required by the Department's own regulation and stated in ACICS's *Accreditation Criteria*, Title II, Chapter 3, Introduction (**Exhibit A-O-3**). ACICS explained that even for 'good cause,' the Council had not allowed any institution to remain accredited beyond the expiration of the maximum timeframe. Further, in extreme findings of non-compliance, ACICS explained that the Council may revoke an institution's accreditation even when the institution's maximum timeframe has not expired. ACICS stated that its *Accreditation Criteria* ensure that an institution is granted appropriate due process rights.

In the December 2016 Decision, the Secretary's discussion of compliance with 602.20 simply concluded that the Department did not have evidence that ACICS took required action against institutions even when faced with information about violations of standards. See December 2016 Decision, at 7. However, the Part II submission provided precisely this information, including ACICS's adverse actions and application of relevant time frames for action under its standards. As a result, the Secretary should have concluded in 2016 that ACICS was compliant with this criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months. See also **Exhibit B-O**, at 602.20(a),(b) discussion.

13. 34 C.F.R. § 602.21(a), (b) – Systemic Review of Standards

The Part II submission narrative and documentary evidence are relevant to demonstrating substantial evidence of ACICS's compliance with this criteria or its ability to come into compliance within 12 months. The Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's own inquiry into compliance with this criteria. Specifically, the Part II submission responded to the request by the Department:

§602.21(a)(b) The agency must provide additional documentation to demonstrate that it has a systematic reoccurring process to identify issues occurring at problematic institutions outside of its normal standards review process as noted in the draft analysis. The agency must also provide a completed CEP and evidence of a standards revision as a result of its review of a CEP.

In the Part II submission, ACICS also responded to the following supplemental question from the Department:

602.21(a)(b) systemic review of standards and 602.21(c) revision of standards – Has any review or change been prompted by the multiple issues and investigations over the past few years? If so, what? If not, why not?

The Department was concerned that ACICS did not have a systematic process to review its standards outside of the scheduled review cycle to address issues at problematic institutions, and make changes as appropriate. In its Part II submission, ACICS explained that it had implemented revisions to several policies and procedures that are designed to strengthen the quality assurance and quality monitoring processes. ACICS provided examples of standards that were either revised or newly introduced as a result of systematic reviews of Council policies and standards over the course of the prior three years. These included: (1) enhanced training and development of ACICS accreditation coordinators and on-site evaluation team chairs, student relations specialists, and other evaluators; (2) aggressive monitoring of institutions that have been subject to ACICS's investigation of complaints and adverse information; (3) monitoring of institutions that show signs of stress that may impact on their financial stability; and (4) introduction and implementation of additional policies and procedures that affect student outcomes (such as placement rates, retention and student persistence rates, licensure pass rates, student satisfaction, graduate satisfaction, and employer satisfaction).

Additionally, ACICS stated that, in August 2014, the Council defined Student Learning Outcomes and included 'direct' as well as 'indirect' assessments of learning especially as they applied to Competency-based Education. ACICS also stated that in December 2014, the Council published extensive standards for Competency-based Programs and that the Council published and included in the *Accreditation Criteria*, a new appendix on Principles and Guidelines for Program Enhancement Education or Study Abroad Activities.

ACICS further explained that the agency had strengthened its procedures for monitoring institutional disclosures of student achievement information, timely notification of Council actions to the Department and other agencies, and pre-emptively requiring teach-out plans from institutions that show evidence of financial instability or that show evidence of significant non-compliance of Council standards. ACICS stated that the Council had taken action on the following items that went into effect in July 1, 2016 with prior notification to member institutions, with input from the public: clear definition of 'Academic Quality'; data integrity standard; recruitment activities review; institutional performance disclosures; and revised definition of 'placement'.

The Part II submission also addressed the issue of changing policies and procedures to address problem schools and provided pertinent emails among ACICS directors, officers, staff members, consultants (including all members of college review teams), and third parties which concern those schools, for the periods specified. ACICS explained that through its systematic process of policy and procedure reviews, which relies on contribution and assessment of all stakeholders and interested parties, ACICS had been making and would continue to make changes that demonstrate its commitment to quality and the integrity of its membership.

The Part II submission further provided examples of off-cycle reviews. To address fraudulent job-placement disclosures, ACICS reported on its adoption of a new Data Integrity

Review. This standard required that all data reported to ACICS must reflect an accurate and verifiable portrayal of institutional performance and is subject to review by ACICS. In relation to this change, ACICS added a dedicated Data Integrity Reviewer to each on-site evaluation team to strengthen the data verification function. ACICS reported that, historically, as part of its annual data collection process, ACICS conducted statistical analysis of the placement outcomes of all its institutions, focusing on the average placement rate, as well as the standard deviations from the mean to determine the spread of the outcomes across all schools and to identify trends that present “at risk” institutions. The results of the analysis varied from year to year and was sometimes affected, in part, by external factors beyond the control of the institutions such as local economic changes (as in the Midwest), and changes in licensure/certification testing requirements.

In the development of a more reliable system, the Council directed the inclusion of a “data integrity reviewer” on every full team site visit, the purpose of which was to focus primarily on the reliability of the placement information reported by institutions on the Campus Accountability Report. With the support of the subject matter experts on the team, the data integrity reviewer was responsible for attempting to contact, via telephone, up to 100% of all graduates reported as placed. The subject matter experts provided practical input on the appropriateness of the placement as disclosed by the campus and confirmed by the graduate or employer. It was also this individual’s responsibility to confirm that acceptable documentation was on file for all graduates classified as not available for placement on the CAR.

ACICS has now fully implemented the PVP system. Institutions submit graduate placement information to the system. Once the placement data has been successfully uploaded to the system, emails are automatically and instantaneously sent to the graduates and employers using a unique template depending on the language and placement type selected that requests verification of the information provided by the campus. The adoption of the PVP process expanded the existing DIR process and is detailed in **Exhibit A-O-2**.

ACICS also reported that it had made changes to strengthen review of recruitment activities and stated that on-site evaluation teams would not only interview recruitment and admissions personnel but would also assess that the institution has a written documentation to show that it systematically monitors its recruitment and admissions activities. ACICS stated that the team would also continue to have access to student surveys which include specific questions on recruitment and admissions practices of the institution.

ACICS noted that the institutional performance disclosure requirements had been clarified and strengthened. ACICS stated that the data must match those reported to ACICS in the most recent Campus Accountability Report and must be reliable. Each of these examples illustrated how ACICS conducts off-cycle reviews in response to issues at institutions.

In the December 2016 Decision, the Secretary’s discussion of compliance with 602.21 simply concluded that “ACICS could not and did not adapt its standards to adequately respond to the violations and failures of its systemic program for evaluating the quality of the institutions and programs it accredits.” December 2016 Decision, at 8. However, the Part II submission provided information about the numerous changes that ACICS had and was making to its standards. As a result, the Secretary failed to consider substantial, relevant evidence and

should have concluded in 2016 that ACICS was compliant with this criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months. ACICS's continued enhancements in this area are further detailed in **Exhibit B-O**, at 602.21 discussion.

14. 34 C.F.R. § 602.22(a)(3) - When Substantive Change Evaluation Required

This criteria was not addressed in the Department's questions that were subject of the Part II submission. See **Exhibit B-O**, at 602.22(a)(3) discussion.

15. 34 C.F.R. § 602.24(c)(1) – Teach Out Plan Triggers

With respect to this criteria, the 2016 Final Staff Report requested that ACICS:

Provide (1) all Documentation regarding teach out policies and processes in general or the application of such policies and processes to any institution in the last three years, and (2) all documentation on specific teach out plans adopted to date for ITT, MJI, or any other schools for whom ACICS was contemplating adverse action.

Further, the Department also posed a supplemental request:

§602.24(c)(1)- The agency needs to revise its teach out plan policies to include the requirements of this section of the criteria.

ACICS's Part II submission responded directly to these inquiries and the information ACICS provided reflected substantial evidence of ACICS's compliance with, or ability to become compliant with, this criteria. Specifically, in the Part II submission, ACICS provided a description and examples of the policies and procedures for teach-out plans and agreements. The policy included the requirements for this criteria. In the submission, ACICS explained when an institution voluntarily or involuntarily closes, it is required to comply with the agency's teach-out policies and procedures (ACICS Petition to the Department, January 7, 2016: Response to Section 602.24(c)(1) Teach-out Plan Triggers, p. 69). In response to the Department request, ACICS also included all email correspondence in connection with teach-outs. Further, ACICS provided evidence of teach-out plans submitted as part of a response to adverse information (Exhibits 153-160: Adverse Correspondence).

ACICS also provided in Table K a summary of campus closings and withdrawals, including approved teach-out/closure plans for institutions under consideration. Additionally, the Part II submission included documents pertaining to teach-out plans and approval letters for selected institutions (Exhibit 145: Teach-out Plans and Approval Letters).

Further, the Part II submission explained that, if an institution closes without processing an acceptable teach-out plan, such as was the case with Corinthian owned schools in California and New York, the agency has applied its policy regarding debarment actions against the chief administrator or other decision-makers (Exhibit 126: Debarment Correspondence and Council Actions).

The December 2016 Decision included no analysis by the Secretary as to why ACICS was non-compliant with 602.24(c)(1) and deferred completely to the 2016 Final Staff Report. However, the information submitted by ACICS in the Part II submission was directly responsive to the Department's request for additional information regarding compliance with this criteria, and was not addressed in either the 2016 Final Staff Report or December 2016 Decision. The Secretary should have concluded in 2016 that ACICS was compliant with these criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months. See also **Exhibit B-O**, at 602.24(c)(1) discussion.

16. 34 C.F.R. § 602.27(a)(6)-(7), (b) – Fraud and Abuse

The Part II submission that was not considered in the 2016 Final Staff Report or December 2016 Decision responded directly to the Department's own inquiry into compliance with this criteria. Specifically, the Part II submission responded to the request by the Department:

§602.27(a)(6-7),(b) The agency's Accreditation Criteria provided fail to comply with the requirements of this section and as a response for this item are not effective until July 1, 2016. The agency has not complied with this section in practice and has provided no basis for concluding it will do so in the future. It is unclear to Department staff how the agency has held its institutions accountable for fraud and abuse prior to this or how it will following the effective date (July 1, 2016) of the new standards.

In the Part II submission, ACICS also responded directly to the Department's supplemental question to this question:

602.27(1)(6-7),(b) fraud and abuse and 602.21 review of standards Given what's happened with problem schools, are there any changes to policies and procedures you've made or plan to make? For each of the instances listed in Section I, please provide all emails among, and Documents sent or received by, any of ACICS directors, officers, staff members, consultants (including all members of college review teams), and third parties which concern those schools, for the periods specified in item h above

Specifically, ACICS confirmed that, through its systematic process of policy and procedure reviews, which relies on contribution and assessment of all stakeholders and interested parties, ACICS had made and would continue to make changes that demonstrated its commitment to quality and the integrity of its membership. To address fraudulent job-placement disclosures, the Part II submission stated that ACICS had adopted a new Data Integrity Standard. (As noted elsewhere, the data integrity process was the predecessor to the current PVP system, see **Exhibit A-O-2**. The submission stated that this standard required that all data reported to ACICS reflect an accurate and verifiable portrayal of institutional performance and is subject to review by ACICS. The submission further stated that the technology system was designed to calculate and test the integrity of certain student achievement data. In order to strengthen the data verification function, the submission stated that ACICS added a dedicated Data Integrity Reviewer to each on-site evaluation team.

ACICS Part II Submission Explanation (May 2018)

Additionally, the Part II submission explained that, to strengthen the recruitment activities review, on-site evaluation teams will not only interview recruitment and admissions personnel but also assess that the institution has a written documentation to show that it systematically monitors its recruitment and admissions activities. ACICS stated that the team will also continue to have access to student surveys which include specific questions on recruitment and admissions practices of the institution that the students were exposed to.

The December 2016 Decision included no specific analysis by the Secretary as to why ACICS was non-compliant with 602.27 and deferred to the 2016 Final Staff Report. However, the information submitted by ACICS in the Part II submission was directly responsive to the Department's request for additional information regarding compliance with this criteria, and was not addressed in either the 2016 Final Staff Report or December 2016 Decision. The Secretary should have concluded in 2016 that ACICS was compliant with these criteria deemed deficient at that time or, alternatively, that ACICS could have come into compliance within 12 months. See also Exhibit B-O, at 602.27(a)(6)-(7), (b) discussion.

Case Name: *In the Matter of Accrediting Council for Independent Colleges and Schools*

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit A-O-1

ACICS Licensure Pass Rate Report (May
2018)

LICENSURE PASS RATE REPORT

MAY 30, 2018

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Introduction

As an accrediting agency recognized by the U.S. Department of Education, ACICS must demonstrate that it has standards that are rigorous enough to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the schools and programs it accredits, including, as appropriate, consideration of State licensing examinations as relevant to measuring student achievement. See 34 C.F.R. § 602.16(a)(1)(i).

- **5% of ACICS Programs Lead to Licensure:** Currently, of the approximately 3,000 active programs offered by ACICS accredited schools, only 153 programs (approximately 5%) require licensure for employment in the occupation for which the program prepares a graduate.
- **Appendix L** of the *ACICS Accreditation Criteria* sets forth the Student Achievement Standards of the agency that apply to retention and placement rates at the campus and program levels, and licensure or certification examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure or certification examinations where applicable, and find appropriate employment.
- **Current 60/70 Rates:** ACICS has a program-level licensing exam pass rate Standard of 60% and Benchmark of 70%, which apply only to programs for which licensure or certification is required to practice in the specific career field. ACICS also requires the program to meet any higher licensure or certification standard set by a state or certification agency.
- **Programs Failing Benchmark or Standard:** A program with rates below the Benchmark must develop and implement an Improvement Plan. See Appendix L. A program with rates below the Standard receive a written show-cause or compliance warning regarding the alleged deficiency as well as further adverse action if the deficiency is not resolved. See 2-2-502 (Program Show-Cause or Compliance Warning).
- **Monitoring via CAR:** Pursuant to *Accreditation Criteria* 2-1-809 (Student Achievement Review), the Council reviews the Campus Accountability Report (CAR) to monitor performance of student achievement including licensure or certification examination pass rates, if applicable to the program(s) offered. Licensure and/or certification examination pass rates are a component of ACICS's overall review of the quality of the institution.

Other standards published in the *Accreditation Criteria*, specific to licensing include:

- **3-1-502 (Programs Requiring Certification or Licensure)** For institutions offering programs in which state certification, licensing, or registration is

mandatory in order to become employed in a specific career field, curricula must contain the necessary course work to afford students the opportunity to obtain the minimum skills and competencies in order to become certified, licensed, or registered in that career field.

- **3-1-503 (*Specialized/Programmatically Accredited Programs*)** Where accreditation of a program by a specialized or programmatic accreditor is required for students to obtain entry-level employment in the state where the institution is licensed or otherwise approved, the institution must obtain such accreditation in a timely manner. The institution must provide and document notification to students as to: (a) which programs hold specialized or programmatic accreditation; (b) whether successful completion of a program qualifies a student to receive, apply to take, or take licensure exams in the state where the institution is located. For online programs, this information must be provided for all states from which the institution enrolls students; and (c) any other requirements that are generally required for employment. The institution shall assess the curriculum and/or the need for specialized accreditation and update it as needed to reflect current requirements for employment.

- **Minimum Requirements of Criteria**

- 34 C.F.R. § 602.16(a)(1)(i) requires agencies to monitor institutional and program quality by reference to licensure exam pass rates when such information is relevant to a program and provided by the institution through the Campus Accountability Report (CAR).
- However, as stated in the criteria, ACICS has flexibility to use “different standards with different institutions or programs, as established the institution,” when and as appropriate.
- Further, as stated in 34 C.F.R. § 602.16(f), agencies are permitted to set and apply their own student achievement standards to accredited institutions, but are not required to so do.

ACICS has always utilized campus level student achievement data submitted through the CAR in evaluating institutional and program quality, but in 2011 took the additional step of establishing a “bright line” licensing pass rate benchmark and standard. In the process of evaluating licensing data as applied to that standard, ACICS has learned that the variety of programs offered by ACICS institutions that report licensing rates creates challenges due to the incomplete, irregular, and inconsistent manner with which many state licensing entities collect and report data. As described below, ACICS will continue to consider license exam pass rates as one indicator of a program’s quality and the institution’s ability to meet its mission, but has taken recent steps to ameliorate problems caused by a bright line licensing rate standard.

Timeline: Collection of Licensure Exam Pass Rate Data

- **2009:** Beginning in 2009, recognizing that an increasing number of programs at its institutions required licensure for employment, ACICS began collecting licensure exam passage rate information as part of its annual data collection process, through its Campus Accountability Report (CAR) (previously the Annual Institutional Report (AIR)). This initial collection, through 2011, was the starting point for the agency to collect and evaluate licensure pass rate data as it impacted placement outcomes and the agency's assessment of the overall quality of the programs in question.
- **2011:** In 2011, the Council established a separate licensure pass rate standard for programs for which licensure is required for employment. Benchmark and compliance standards were set at 60% and 40% respectively.

As published in the December 2011 Memorandum to the Field,

Although as an institutional accreditor, ACICS has for many years had specific, well-defined campus-level standards for student achievement, USDE requires that in order to be officially recognized, ACICS must immediately add program-level standards including standards for licensure pass rates, that clearly distinguish the threshold below which an institution is out of compliance with these standards, and include an evaluation of all programs against these student achievement measures in a detailed written report provided to the institution.

This standard included a stipulation that "programs must also meet any applicable state or national pass rate standards."

- **April 2012:** In April 2012, guidance was provided to the membership concerning the collection and reporting of these rates, including the following considerations:

Standards for Compliance – Campuses should also report if the relevant state or national testing agency has established a standard below which a program is considered to be out of compliance.

Size of Programs – The ACICS standards for Licensure Pass Rates will only apply to programs with 10 or more graduates. Smaller programs may be examined on a case-by-case basis.

On-line programs – A drop-down menu will be provided for members to indicate if graduates from an on-line program are taking licensure examinations in any states that have their own licensure pass rates standards.

Special Circumstances – This is a text field on the CAR for use in reporting any circumstances for which data are provided other than rates that are

- reported for a calendar year
- describe results for graduates from one campus

- including only first-time test takers
- as calculated by the responsible state or national agency
- **June 2012:** In June 2012, during its review for recognition by the U.S. Department of Education, ACICS was “strongly” advised to revise and increase its minimum standards for all student achievement outcomes. ACICS accordingly revised its rates upward to 70% and 60% for benchmark and compliance, respectively, and combined the requirement that accredited programs leading to licensure also meet any other state or certification agency pass rate standards. Institutions were expected to comply with the 2012 Campus Accountability Report (CAR) submission in November 2012.
- **December 2012:** During its review of the CAR results at its December 2012 meeting, the Council determined that licensure data were not, and could not have been, submitted for a number of programs because of the reporting schedules of the state licensing agencies. That is, while the CAR was due in November for the previous July – June reporting period, oversight agencies like the state nursing boards reported their rates on a calendar schedule, with the annual rate published in the winter or spring of the following year. Of the 121 programs reported on the CAR, 57 did not have licensure data. Consequently, the Council acted to revise its data collection period to March 2013, and from the data received, there was a 147% increase in reporting from the CAR submission (an additional 178 programs were able to provide data) for subsequent review of the results at its April 2013 meeting.
- **April 2013:** The Council’s deliberation of the licensure information obtained is outlined in **Exhibit 1** (April 2013 Policy Outline) and **Exhibit 2** (April 2013 Policy Item Additional Notes).

Of note is the Council’s recognition of the various circumstances and processes that directly impacted the accuracy of licensure data reported, including the availability of first time rates versus cumulative rates and defined standards of the licensing or state agencies, to name a few.

Therefore, in lieu of taking actions based on the standards published in 2012, the Council determined that, given that the data on licensure pass rates were revealed to be rife with inconsistency, ACICS advised institutions accordingly, by placing the programs on compliance warning to request additional information as well as requiring an improvement plan (See **Exhibit 1**, at 2)

To further augment its assessment of licensing pass rate data, the Council directed the inclusion of a licensure documentation review during the onsite evaluation visit process to

better inform the team on the quality of the program in meeting its objectives against the expectations of the licensing body.

Having tasked staff to research the practicality of having separate licensing pass rate standards independent of that of other licensing oversight agencies, the Council, at its August 2013 meeting, issued revised guidance based on the information available to it at that time. See Exhibit 3 (August 2013 Policy Outline). That information included the review of the standards and procedures of other similar accrediting agencies:

- ✓ ABHES applies its own standards without regard for that of the agency and does not differentiate between distinct types of data (licensure, registration, or certification).
- ✓ ACCSC collects information about Licensure/Certification Examination Agency Pass Rates as well as numbers of graduates who take and pass the exam.
- ✓ COE also applies their own standard without regard to the agency standard and does not differentiate between several types of data.
- ✓ DETC analyzes pass rate results on a case-by-case basis.

Since ACICS does not control the type of data on licensure pass rates that is provided to member institutions, the definition of pass rates was also simplified by removing references to first-time, cumulative, combined or calculated. Institutions, in 2014 and 2015, reported any data showing that the percent of students who passed the exam sometime during the reporting period meets or exceeds the ACICS standard and for which they can provide adequate documentation.

One of the implications of this revision of the data reported was the inconsistency of the data provided – some being cumulative, some being first time, others based on a calendar report, while others manually calculated to match the CAR.

Licensure Pass Rate Actions (2016 CAR)

The Council took the following pass rate outcome actions in February 2017 from the 2016 CAR submission:

- 49 programs were directed to show-cause why approval should not be withdrawn
- 27 programs were placed on compliance warning
- 50 programs were placed on reporting

As a result of these actions, ACICS received extensive feedback and guidance from institutions, industry experts, and contacts from oversight agencies, on the challenges with the data collected and reported by state licensing agencies and certification organizations.

Challenges with the Information Collected

During its verification of the information reported and feedback from campuses subsequent to the extensive actions taken, the Council was receptive to the challenges surrounding the review and enforcement of a “bright line” licensure pass rate standard, outlined below.

Some of the inconsistencies identified included, but are not limited to: when the rates are published, how often they are published, who is calculated in the cohort to determine the rate, and how agencies correct their rates when errors are found.

Second, when conducting its own review, staff was sometimes unable to obtain independent verification of the data as published by the oversight agency/third-party entity because it was not published but only available by request or as a cohort in the state (not separately by institution). Further, attempting to secure licensing agencies’ internal formulas and standards for published passage rates was difficult even after direct outreach.

Third, the testing/certification/registration procedures of the oversight agency/third-party differed widely, with no consistency on the determination of the rate. For example, the Florida Board of Nursing used to only consider for its calculation, first time test takers within the first 6 months of program completion. The success of graduates after the 6 months or on subsequent attempts do not count even though they did obtain licensure and can secure employment.

Fourth, the opportunity to sit for the licensure or certification exams vary geographically and graduates may not be able to take the exam for months. In some cases, as in Puerto Rico, while licensure is required for the majority of vocational programs, the activity of the oversight agency is limited or non-existent with graduates having to wait for years to take the test.

Finally, even though ACICS presumed that the rates published by the oversight agencies were accurate, on a number of instances, it obtained reliable information that corrections to rates made through a successful appeals process were not incorporated into the rates being reflected online. Consequently, ACICS would not know of these discrepancies until a conditioning or adverse action is taken, to the possible detriment of the institution.

Licensure Pass Rate Review and Verification – 2017 and 2018

- **2017:** ACICS revised questions on the 2017 CAR to improve the collection of pass rate information and included a prompt that only rates that are required **and PUBLISHED** needed to be reported.
- **2018:** At the April 2018 meeting, the Council approved language, published in the May 2018 Memorandum to the Field as proposed for comment, that would allow ACICS to consider any conditions, including actions from the oversight agencies, in taking student achievement enforcement action. See Exhibit 5 (May 2018 Memo to the Field).

Further, the Council would account for, “...external factors, beyond the control of the campus, which severely impact its ability to maintain compliance with outcomes.”

- Prior to taking this action, the Council revisited the standards of other agencies and its initial licensure review procedures to identify best practices that it could emulate. Ongoing concerns with applying a bright-line standard without mitigating circumstances review for licensure influenced its discussion and decision at the April 2018 meeting.
- Campuses that had a previous licensure action (show-cause or compliance warning) as well as those which reported programs that were below 60%, were directed to provide additional information for the Council’s review at its subsequent meeting. See Exhibit 4 (Request for Licensure Outcomes Information Template).

Licensure Pass Rate Ongoing Discussions and Challenges

Additional discussion on the review and impact of licensure pass rates on overall student success, academic quality, and institutional accountability is expected at the August 2018 meeting following receipt of comments from all interested parties.

POLICY ACTION-DECISION OUTLINE

- COMMITTEE:** IEC/4.13/2
- DATE:** April 8, 2013
- ISSUES:** **Programs that did not meet the licensure pass rate benchmark and compliance standards in the 2012 Campus Accountability Report and/or CAR Addendum; Continuation of CAR Addendum; and Verification of Licensure Pass Rate data.**
- STAFF:** Ms. Terron King and Dr. Thomas Wickenden
- CRITERIA:** **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 requirements

ISSUE: Should the Council place programs falling below Licensure Pass Rate benchmarks and standards on Student Achievement Review?

OVERVIEW: Staff recommends placing 137 programs on student achievement review (106 below benchmark standards and 31 below compliance standards).

	Programs Without State Pass Rate Standards Below ACICS Licensure Pass Rate Benchmark (59.5%)	Programs Without State Pass Rate Standards Below ACICS Licensure Compliance Standard (39.5%)	Programs Below State Standards and Below ACICS Licensure Compliance Standard (39.5%)	Programs Below State Standard and Above ACICS Licensure Pass Rate Compliance Standard (39.5%)
Licensure Pass Rates	17- Program Improvement Plan Required	5- Program Improvement Plan Required and Compliance Warning	26- Program Improvement Plan Required and Compliance Warning	91- Program Improvement Plan Required

- OPTIONS:**
1. Accept staff recommendations
 2. Reject staff recommendations

RECOMMENDATION: Option 1

MOVED:
SECONDED:

AMENDMENTS:

MOVED:
SECONDED:

ISSUE: Should the Committee continue the CAR Addendum for collecting licensure pass rate information due in March of each year and considered at the April Council Meeting?

OVERVIEW: There were 121 programs reported in the CAR, submitted in November 2012. In addition, 57 programs indicated that they did not have data for 2012 licensure pass rates at that time. For this reason the committee decided to ask campuses to fill out the licensure pass rate questions a second time in March 2013. An additional 178 programs completed the CAR Addendum in March, for a total of 299 programs reporting. The number of programs, if any, that reported “no data” in March and the reasons for any remaining lack of data will be identified. However, based upon the 178 additional programs that were able to report licensure pass rate data in March (60% of the total), it appears that many programs do not have licensure data on the current year that they can report when the CAR is due in November.

Therefore, **it is recommended that the questions regarding Licensure Pass Rate information be permanently moved to the CAR Addendum to be submitted by March of each year and considered by the Council at the April meeting.** The other implications of this change of date are as follows:

- Evaluators will review Licensure Pass Rates and any required program improvement plans required by the Council at the April Council meeting, starting with the Spring cycle and running through the Winter cycle, whereas they review retention and placement and any required improvements plans from the Winter cycle through the Fall cycle.
- Any campus receiving a Licensure Pass Rate Warning in May, will have through the following April to meet a 12-month timeframe for compliance, through the following December to meet an 18-month time frame and through the next April to meet a 24 month timeframe.

OPTIONS:

1. Accept staff recommendations
2. Reject staff recommendations

RECOMMENDATION: Option 1

MOVED:
SECONDED:

AMENDMENTS:

MOVED:
SECONDED:

ISSUE: Should the Council direct that subject matter specialists on full evaluation team visits should check required documentation on the licensure pass rate and the licensing agency's licensure pass rate standard for any program(s) which they review that require licensure for employment in the state where the institution is located?

OVERVIEW: As of 2012, Licensure pass rates standards have been added to the student achievement standards at the program level and are applied to licensure pass rate data. In addition, if an licensing agency has a standard for the licensure pass rates that are acceptable from programs whose graduates apply to take a licensure examination, that rate is also reported in the CAR and applied to the data. The question has been raised as to how this data should be checked by ACICS.

It is recommended that the same mechanism be used to check licensure pass rate data as has been used by ACICS to check data on retention rates and placement rates, namely evaluation of documentation by program specialists serving as evaluators on site visit teams. (Of course a new, separate program has been proposed to supplement the verification of placement rates, but only the original on-site spot check is recommended for licensure pass rates).

Placement rates differ from retention and placement rates, in that at present, the rate is calculated by the licensing agency and reported to the campus and thence to ACICS. Therefore verification of licensure data is far easier since only programs for which licensure is required to be employed must be checked. Moreover, the data that must be checked is data on a program, not data on each student who has been retained or who has been graduated and placed by a program. However, just like campus data submitted in the CAR on retention and placement rates, the data submitted in the CAR Addendum on licensure pass rates and agency pass rate standards (if any) can be reported in error and therefore should be checked by reviewing the documentation from the licensing agency for the pass rate and for the pass rate standard, if any. The campus is required to maintain documentation in the form of communications from the licensing agency and would make available in the team room a file with a copy of this documentation on any program or programs for which licensure was required. The program specialists would be familiar with the licensing examination in their field of expertise and could easily and quickly review the two percentage figures in the CAR against the figures in the documentation: (1) the current pass rate for the program and (2) the agency pass rate standard.

Any campus which had reported either figure inaccurately would be cited until they revised the CAR Addendum with the correct figures. Any revised pass rates that were below the ACICS benchmark would be immediately placed on review and required to develop a Licensure Pass Rate Improvement Plan. Any program whose revised rates fell below the compliance standard would be given an official warning, with an appropriate timeframe.

SUMMARY OF REPORTING RESULTS FROM THE CAR ADDENDUM

OVERVIEW: There were 121 programs reported in the CAR, submitted in November 2012. In addition, 57 programs indicated that they did not have data for 2012 licensure pass rates at that time. For this reason the committee decided to ask campuses to fill out the licensure pass rate questions a second time in March 2013. The results were as follows:

- Additional Licensure Pass Rates - An additional 178 programs completed the CAR Addendum in March, for a total of 299 programs reporting. This represents 60% of the total and a 147% increase over the CAR
- No Data due to timing - The number of programs that reported “no data” in March was 70, but only 8 reported that 2012 rates had not been received yet, so the March reporting date appears to be optimal.

RECOMMENDATION: Retain the CAR Addendum in March of each year.

The implications of separating the determination of licensure rates from the determination of retention and placement rates include the following:

- Evaluation of requirements - Evaluators will review the documentation for Licensure Pass Rates and any required program improvement plans required by the Council at the April Council meeting, starting with the Spring cycle and running through the following Winter cycle, whereas they review retention and placement and any required improvements plans from the Winter cycle through the following Fall cycle.
- Timeframes for compliance - Any campus receiving a Licensure Pass Rate Warning in May, will have through the following April to meet a 12-month timeframe for compliance, through the following December to meet an 18-month time frame and through the next April to meet a 24 month timeframe.
- Test Takers versus Graduates – The goal of the CAR Addendum is to collect current and complete data on student success at passing required licensure exams for application of standards by the Council. To minimize the reporting burden on ACICS members, the CAR Addendum is based upon summary data reported to the campuses each year by licensure agencies. Therefore, it is based upon the cohort of students who take a required exam rather than on students who graduate from a program.
- Calendar versus Reporting Year – The CAR Addendum is based on data reported by the licensing agency during the most recent calendar year ending in December 31. Some agencies have reporting years that correspond closely to ACICS’ reporting year, but for those who include pass rate data from the calendar year, it would include students whose graduation is more recent than those reported in the CAR and could include students who graduate earlier. So, there is substantial overlap but no precise link between the cohort of graduates in the CAR and the cohort of test takers in the CAR Addendum.
- Lack of explanation - Most of the other 70 programs do not receive any data or do not receive any first-time pass rate data from the licensing agency or did not provide an explanation.

RECOMMENDATION: Require an explanation for all programs without data

- Cumulative Rates - Cumulative rates were reported by 193 programs.

RECOMMENDATION: If first-time data is not provided, use the Cumulative data for evaluating these programs. NOTE: Cumulative data is proposed for use in obtaining a waiver if the first-time rate is below compliance and the cumulative rate is above ACICS standards.

- Lack of first-time or cumulative data – Some agencies report all students who take each exam, without differentiating between first-time rates and cumulative rates.

RECOMMENDATION: Combined data could be lower than either first-time or cumulative rates, so it should not be entered.

- State Standards – Some states have standards, but the standard was written instead of numeric and therefore could not be used in calculations.

RECOMMENDATION: Allow entry of numeric data only on state standards.

RESULTS OF CAR ADDENDUM

Programs reporting 2012 Licensure Pass Rates

Reported in CAR	121
<u>New reports in CAR Addendum 178</u>	
TOTAL Reporting Data	299

Programs where data were not provided

Required hours, no exam	1
Wrong program – closed in 2011	3
No data for single campus	7
Less than 10 exam takers	8
No data provided by agency/can't determine	8
<u>Results not yet received</u>	<u>8</u>
Total technical issues	35

Programs where first-time data not provided

<u>No first time data/can't tell</u>	<u>19</u>
Total where data not provided	19

Total No explanation

TOTAL NO DATA	70
TOTAL REPORTING	369

Programs reporting Cumulative Rates

State Standards	193
Programs with State Standard	259
Standard is written & won't calculate	92
<u>No Standard</u>	<u>18</u>
Total Reporting	369

Programs preparing students for exams in other states

Misreporting of national exams and reciprocity	5
<u>Other states, with rate above standard</u>	<u>2</u>
Total Reporting	

Recommendation

- 1. Ask for pass rate from licensing agency**
 - a. If more than 1 type of rate, highest or best**
 - b. If more than 1 exam or part of exam, average, weighted by takers**
- 2. Ask for type of data, if known, but apply ACICS standard to all**
- 3. Ask for mitigating circumstances**
 - a. If incorrect, calculate based on student data and document result above ACICS standard**
 - b. If first-time or combined rate provided by agency inappropriate, document by calculating pass rate with % of students passing on any attempt (cumulative) above ACICS standard.**
 - c. If hard exam, document by 50% or more of state programs below ACICS pass rate standard**
 - d. If high standard, document by state standard below ACICS standard**
 - e. If students' fault, document by 30% or more of students taking the test who graduated before the start of last year's reporting period – July 1, 2011.**

Policy Action-Decision Outline

- COMMITTEE:** IEC/8.13/3
- DATE:** August 5, 2013
- SUBJECT:** Licensure Pass Rates
- STAFF:** Dr. Thomas Wickenden, Ms. Terron King
- ISSUE:** Should the IEC propose that the ACICS Licensure Pass Rate Standard be modified for 2013 to include only the ACICS standards of 70% for benchmark and 60% for compliance (and not combine it with any agency standards) and to utilize whatever data on pass rates the institution wishes to provide and is able to document.
- OVERVIEW:** At the December 2011 meeting, pursuant to the U.S. Department of Education interpretation of a regulation governing the recognition of accrediting agencies, the Council defined a licensure pass rate standard for programs for which licensure is required for employment. This standard included a stipulation that “programs must also meet any applicable state or national pass rate standards.”
- At the December 2012 meeting, the Institutional Effectiveness Committee (IEC) reviewed data from the Campus Accountability Report (CAR) and determined that many members offering programs for which licensure is required were not able to report data for 2012 since this data is reported by some licensing agencies after the end of the calendar year, and the submission date for the CAR was November 15th. Therefore the IEC decided to collect information on licensure pass rates for 2012 by March 15, 2013 and review the results at its April 2013 meeting.
- At the April 2013 meeting, the IEC determined that the amount of data submitted on licensure pass rates was substantially increased by moving the submission date for this information back to March, and decided to continue collecting licensure pass rate information each year through an Addendum to the CAR due by March 1st.
- The information reported to the IEC in April of 2012 was divided into four reports: Institutions without an agency standard below the ACICS standard for benchmark and below the ACICS standard for compliance, and institutions with an agency standard below the ACICS standard for benchmark and below both the agency standard and the ACICS standard for compliance. This was based upon a strict interpretation of the footnote about meeting both agency and ACICS standards to be out of compliance. Furthermore, the pass rates collected were defined as “first-time” pass

rates, although provision was made for also collecting “cumulative” pass rates, where available or where they could be “calculated” from “combined” data provided by a licensing agency. Thus it was recognized that there were potentially four different types of data that could be provided and used to calculate a program’s licensure pass rate.

The IEC decided that the data on licensure pass rates were overly complicated and should be simplified before the compliance standards were applied. They determined that only improvement letters requiring licensure pass rate improvement plans should be sent to member institutions. Those institutions below the standard for compliance would not be placed on warning but should receive an “fyi” letter for their information, informing them that programs below the compliance standards would have been placed on compliance warning if the standards had been implemented this year.

The IEC also proposed that at the August meeting, the committee revisit two issues: (1) **Source of Standards** – Since licensing agencies can administer their own standards and withdraw approval for a program without concurrence from ACICS, the standard should be simplified by focusing only upon the ACICS benchmark (70%) and compliance (60%) standard. Most agency standards are higher than the ACICS standards, so the likelihood that a campus is above the licensing agency standard and below ACICS’ compliance standard is low. Moreover, if that is in fact the case, a campus can now request a waiver from the application of the ACICS compliance standard by describing this as an “other mitigating circumstance” and uploading documentation as part of the submission of the 2013 CAR. (2) **Type of Data** – Since ACICS does not control the type of data on licensure pass rates that is provided to member institutions, the definition of pass rates should be simplified by removing references to first-time, cumulative, combined or calculated, and accepting any data showing that the percent of students who passed the exam sometime during the reporting period meets or exceeds the ACICS standard and for which they can provide adequate documentation. This documentation might be reviewed by evaluators on full-team on-site evaluations as part of the verification of the CAR.

Other Accreditors who have standards for Licensure Pass Rate also utilize this general approach.

- ABHES applies their own standards without regard to agency standards and does not differentiate between different types of data.

- ACCSC collects information about Licensure/Certification Examination Agency Pass Rates as well as numbers of graduates who take and pass the exam.
- COE also applies their own standard without regard to the agency standard and does not differentiate between different types of data.
- DETC analyses pass rate results on a case-by-case basis.
- No response was received yet from NACAS.

CRITERIA:

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 centrally controlled institution must also submit a consolidated Institutional Accountability Report (IAR) containing information and data on the institution as a whole. These reports are due on or before November 1 annually.

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. Those with campus- or institution-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.

OPTIONS:

1. Adopt the following language as proposed criteria and final changes in the Student Achievement Standards section of the web site, the 2013 CAR Addendum, and the Guidelines and Instructions for the 2013 CAR Addendum and publish it in the Memorandum to the Field for comments (additions are underlined and deletions are ~~struck out~~).

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) and, for licensure pass rate information, on the CAR Addendum for each main campus and for each additional location. A centrally controlled institution must also submit a consolidated Institutional Accountability Report (IAR) containing information and data on the institution as a whole. These reports CAR is are due on or before November 1, annually, and the CAR Addendum is due on or before March 1, annually. The IAR is due on or before September 1, annually.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR), the CAR Addendum, 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. Those with campus- or institution-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.

Student Achievement Standards – The description of the licensure pass rate standard on the ACICS web site should be changed to include only the ACICS standard and to mention the possibility of mitigating circumstances. The footnote in the table of Student Achievement Standards stipulating that “programs must also meet any applicable state or national pass rate standards,” will be interpreted to mean compliance with an agency standard considered separately from the ACICS standard.

2013 CAR ADDENDUM – The questions previously included in the CAR and now the CAR addendum should be simplified to refer only to the pass rate. The definition will be general enough to encompass any type of data. The changes below are proposed for the 2013 CAR Addendum to be submitted by March 1, 2014.

2013 CAR Addendum

Institution ID:
Institution Name:
ACICS Program Name (Code):
Institutional Program Name:
Credential Awarded:

Licensure Information

1. Is certification, licensure, or registration based upon an industry-recognized examination required to become employed in your state in this curriculum area?

Yes

No

2. Agency administering the exam:

3. What is the first-time pass rate for this program (i.e., the percent of program graduates who sat for the examination and received a passing score ~~when they first took the exam~~ some time during the reporting period) for the last three calendar years? You may enter first-time rates or cumulative rates, and rates that you have received or that you have calculated. If there is no pass rate available for one or more year(s) select "No Data" for the year(s). This question will populate the field with N/A for all blank fields.

No Data for all fields No Data for all blank fields

2013:	<input type="text" value="N/A"/> <input type="text" value="No Data"/>
2012:	<input type="text" value="N/A"/> <input type="text" value="No Data"/>
2011:	<input type="text" value="N/A"/> <input type="text" value="No Data"/>

If the pass rate for 2013 is "N/A," please explain (required).

Data not available.

4. Enter the ~~cumulative pass rate~~ for this program for 2012 (i.e., the percent of program graduates who sat for the examination and received a passing score in the first or a subsequent taking of the exam during the calendar year), if it is provided or can be calculated.

Data not available.

5. If the agency providing the certificate, license, or registration based upon an examination has a pass rate standard (i.e. the pass rate that a program must meet or exceed in order to be in good standing), please describe the following:

a. the standard (%)

6. Does the program prepare graduates to take a certification, licensure, or registration examination required to become employed in any other states (e.g., including, but not limited to, contiguous states or states served through distance education)? Do not include national exams like the NCLEX or reciprocity agreements.

Yes

No

7. Does the agency in any of these other states which provides the certificate, license, or registration examination have a pass rate standard?

Yes

No

8. Describe

	the state or states	the standard (%)	Your pass rate in this state
_____	_____	_____	_____

4. Request for a Waiver from the Licensure Pass Rate Standard based on Other Mitigating Circumstances.
Please describe any mitigating circumstances over which the campus has no control and which has brought the Licensure Pass Rate for this program below the ACICS compliance standard. [Please upload documentation and a program improvement plan addressing the issue in the "Upload Backup Document" section of the CAR.]

2013 CAR Addendum Guidelines and Instructions. Current CAR Guidelines and Instructions will be modified as follows:

Licensure Information - ACICS is collecting information about licensure pass rates in order to apply standards to these rates. Where relevant, please describe the pass rates and pass rate information you receive from the licensing agency by answering the following questions:

1. Exam Requirement - If program graduates who seek employment are required to have a certification, licensure or registration based upon an industry-sponsored examination in this field in your state, please answer "Yes." If you answer "Yes," other questions will appear and must be completed. Otherwise, please answer "No," even if your program requires or recommends that graduates take such an exam.

2. Examining Agency - Please list the state, regional or national agency which administers the required examination in the text field provided.

3. Calendar Year ~~First-Time~~ Pass Rates - If you are provided by the examining agency with a ~~first-time~~ pass rate for your program graduates who sat for the exam for each of the last three calendar years, please include these rates. You may include a first-time rate, a cumulative rate, or a rate that you calculate based upon the information you have received

from the examining agency or from your students. If you do not have pass rate information for a year, please indicate "No Data." If you have no data for 2012, please explain why in the text box below the question. The definition of a first-time pass rate is the percent of graduates or completers of your program who sat for the examination and received a passing score when they first took the exam. 4. Calendar Year Cumulative Pass Rates If you are provided with cumulative data on your program's pass rate for calendar 2012, please enter it. If not, check "Data not available." A cumulative pass rate is defined as the percent of program graduates or completers who sat for the exam and received a passing score in the first or in a subsequent taking of the exam during the calendar year. This rate may be considered as a mitigating circumstance, if the first-time pass rate is below the ACICS compliance standard.

4. Mitigating Circumstance – If there is a circumstance over which the campus has no control and which has brought the Licensure Pass Rate for this program below the ACICS compliance standard, you may request a waiver from the application of that compliance standard. Along with a description of the circumstance in response to this question, please upload documentation for the mitigating circumstance and a program improvement plan addressing the issue in the "Upload Backup Document" section of the CAR.

Instructions regarding other questions will be deleted, since those questions will be deleted.

2. Make no changes.

RECOMMENDATION: Option 1

MOVED:
SECONDED:

AMENDMENT:

MOVED:
SECONDED:



DATE

ID Code 000XXXX(M/BC)

VIA E-MAIL ONLY

campusemailaddress

CAMPUS CONTACT
TITLE
INSTITUTION NAME
ADDRESS
CITY, STATE ZIP CODE

Subject: Student Achievement Review – Licensure Outcomes Reporting

Dear Mr./Ms./Dr. CONTACT LAST NAME:

The Council has reviewed the licensure/certification information reported on the 2017 and/or 2016 Campus Accountability Report (CAR) for the NAME OF PROGRAM CREDENTIAL program. As part of its review, the Council recognized that other factors which may influence the data reported, were not previously submitted for its consideration of appropriate action.

Council Action

Therefore, the Council acted to direct the campus to provide a report of supplemental information relative to the licensure/certification data reported for its subsequent review at its August 2018 meeting. This report must include the following items, with substantive documentation as appropriate:

1. Narrative on the licensure reporting process with the appropriate oversight agency or licensing body and its impact on the ACICS CAR data. The narrative should also include the campus's assessment of its licensure performance and the subsequent impact on placement outcomes.
2. All communication from any oversight agency or licensing body, including any monitoring or reporting actions taken as a result of the program's performance.
3. Any updated licensure data since the CAR submission with appropriate narrative to explain the results.
4. A licensure pass rate improvement plan for the program, to be included in the Campus Effectiveness Plan for student learning outcomes, which includes a summary of historic data, an analysis of the program's performance over time, and the specific activities that

MAIN CONTACT

Date

Page 2 of 2

have been implemented in the past year with measurable evidence of results to improve the pass rates.

This report must be submitted electronically to reporting@acics.org no later than **July 1, 2018**. Failure to follow the Council's directive may result in the suspension or revocation of your institution's grant of accreditation.

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincerely,

Michelle Edwards
President and CEO

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov) (caseteams@ed.gov)
Mr./Ms./Dr. MAIN CONTACT, State Contact Agency (e-mail address)
[If institution has specialized accreditation:
Mr./Ms./Dr. MAIN CONTACT, Specialized Accrediting Agency (email address)]



MEMORANDUM TO THE FIELD
MAY 2018

TO: ACICS-Accredited Institutions and Interested Parties
FROM Accrediting Council for Independent Colleges and Schools
DATE: May 3, 2018

The Memorandum to the Field contains proposed criteria along with other information for ACICS-Accredited Institutions and Interested Parties

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1. Proposed Criteria Revisions

At its most recent meetings, in February and April, the Council reviewed specific areas of the ACICS *Accreditation Criteria* outlined in this section, and approved the revisions as proposed for feedback from the field (new language is underlined, deleted language is struck). Proposed changes are reconsidered for final approval and implementation at the Council’s next meeting and incorporate the perspectives shared by the field. Public comment on these revisions is requested through the ACICS Comment Survey explained at the end of the memorandum. ACICS requests comments and recommendations from a broad cross section of ACICS stakeholders, including students, faculty, school administrators, policy advocates, and other interested parties.

A. Minimum Eligibility – Programs with no enrollment

Explanation of Proposed Changes:

The Council proposes to remove procedural language regarding the minimum eligibility of an institution that may be seeking accreditation but has a program with little to no enrollment. The proposed stricken language is outdated and procedural in nature, therefore not applicable.

Section 1-2-100(e) – Minimum Eligibility Requirements

To be eligible for consideration for accreditation, an institution or entity must satisfy the following minimum requirements.

- (e) ... It shall have a sufficient number of graduates from a majority of its programs to enable ACICS to assess the educational effectiveness of those programs. ~~Programs offered at any credential level from which there are no graduates will be reviewed in accordance with Section 2-2-107.~~

B. Financial Reporting

Explanation of Proposed Changes:

The Council proposes to clarify the requirements for an institution's Annual Financial Report (AFR). The proposed language would explicitly state that the AFR dates, as well as those on other financial reports, should align with the institution's financial year.

Section 2-1-802. Annual Financial Report. The Annual Financial Report must be submitted on Council forms and be certified by an officer or stockholder of the corporation. Data reported must align with an institution's fiscal year and must be submitted separately for each campus included in the institution's grant of accreditation. It is due no more than 180 days after the end of the institution's fiscal year. Failure to submit the Annual Financial Report in a timely manner will result in the revocation of accreditation.

Section 2-1-803. Compliance Audits and Audited Financial Statements. Title IV compliance audits and audited financial statements, certified by an independent certified public accountant, are essential instruments in the determination by ACICS of an institution's compliance with Title IV requirements and financial stability. All institutions are required to submit audited financial statements within 180 days of the end of their fiscal year, and the statements must represent the institution's fiscal year. All institutions that participate in the Title IV program are required to submit the compliance audit within 180 days of the end of their fiscal year. This audit must also represent the institution's fiscal year, as required by U.S. Department of Education regulations.

C. Student Achievement

Explanation of Proposed Changes:

The Council proposes additional language to the student achievement standards, in consideration of best practices in the industry that are aligned with its expectations. The additional language gives consideration to extenuating circumstances during the review of a campus's data relevant to student achievement on the Campus Accountability Report (CAR). Recognizing that there may be external factors, beyond the control of the campus, which severely impact its ability to maintain compliance with outcomes, the Council will provide an opportunity for these campuses to submit substantive evidence of the direct relationship for its review. The campus would also have to demonstrate, through other direct and indirect indicators, that students have achieved the outcomes of the program.

In addition, the Council also proposes language which further clarifies its expectations for the review and actions on reported licensure pass rates, when needed for employment. The proposed language will defer to any action taken by the oversight agencies' in their focused review of the outcomes in the programs where licensure/registration/certification is required for employment. In its review of the differing roles of these agencies across states and industries, the Council determined that its monitoring and incorporation of licensure outcomes as part of its overarching consideration of student achievement review would be more appropriate and consistent with other accrediting agencies.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention, placement, and licensure or certification examination pass rates, if applicable. When this review indicates that the achievement of an institution's students is below benchmark, the Council at its discretion will take action consistent with the guidelines outlined in Appendix L, Student Achievement Standards and Campus Accountability Reports.

APPENDIX L

...

STUDENT ACHIEVEMENT STANDARDS

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure or certification examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure or certification examinations where applicable, and find appropriate employment. Consideration will be given to extenuating circumstances in relation to local, state, or national requirements or trends; student population; program length; graduates pending the completion of licensure or certification exams; economic or cultural factors; or any other reasonable circumstances impeding an institution's ability to meet or exceed the established compliance standard. However, the institution must also submit documented evidence of student learning through other appropriate indicators.

Campus-Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard	Benchmark*
Retention Rate	60%	70%
Placement Rate	60%	70%
Program-Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard	Benchmark*
Retention Rate		
• Program length equal to or less than one (1) year	60%	70%
• Program length equal to or more than one (1) year	60%	65%
Placement Rate	60%	70%
	60%[^]_^	70%

Licensure Examination Pass Rates, where applicable**		
--	--	--

**A campus and/or program whose rates fall below the Benchmark must develop and implement an Improvement Plan.*

***Standards apply to programs for which licensure or certification is required to practice in the specific career field. The program is required to meet any higher licensure or certification agency standards.*

^ The Council also will consider any conditions or negative actions from other oversight agencies, as well as additional student achievement indicators when taking an action.

D. Date of Revocation Following a Campus Closure

Explanation of Proposed Changes:

The Council proposes language to provide clarification that an institution's grant of accreditation or a campus' inclusion in an institution's grant of accreditation will be revoked effective the last date of academic activity/instruction, not the final day of administrative operations (the date a campus finally closes its doors), since academic activity is required for accreditation. This correlates with the date that an institution reports to the Department of Education for Title IV purposes.

The revision would also clarify that the accreditation of a summarily suspended institution would be revoked effective a date later than its actual closure, should the institution provide information (not a petition indicating that it has not closed) as to its actual closure date.

2-2-301. Closing of a Main Campus. An institution is required to notify ACICS as far in advance as possible when it plans to cease operation. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The institution's grant of accreditation will be revoked effective its final date of academic activity~~as of the effective date of closing~~.

When ACICS receives information from any source that an institution has ceased to operate, it shall immediately take steps to verify the information. If the Council believes that the institution, in fact, has ceased operations, the grant of accreditation is summarily suspended. Such action is authorized without prior notice or hearing and with immediate public notice.

The institution shall be notified of the summary suspension in writing at its address of record. Within 10 days after receipt of the suspension notice, the institution may petition ACICS for an expedited determination of whether such suspension should be withdrawn. If no petition is filed within 10 days, the suspension automatically shall become a revocation effective as of the date of notice of suspension. Alternatively, should the closed institution provide ACICS with information regarding its final date of academic activity, the suspension shall become a revocation effective as of the date provided by the institution.

2-2-302. Closing of a Nonmain Campus. An institution is required to notify ACICS as far in advance as possible when it plans to close a nonmain campus. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The nonmain campus will cease to be included in the institution's grant of accreditation effective its final date of academic activity as of the effective date of the closing.

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:

- (a) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (b) An institution or campus fails to submit a written response to a show-cause directive by the indicated due date.
- (c) An institution or campus whose accreditation has been summarily suspended does not challenge or appeal the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (d) The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801-2-1-802.)
- (e) The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

E. Voluntary Withdrawal

Explanation of Proposed Changes:

The Council proposes the addition of language on the formal process that should be employed when an institution wishes to voluntarily withdraw its accreditation or the inclusion of one of its branches from within its accreditation status from ACICS. This language provides the necessary actions to be taken by an institution or campus seeking to withdraw and the subsequent revocation action that would be taken by the Council upon withdrawal. Institutions are advised that implications may exist for the eligibility of their students for licensure or certification exams necessary for graduate employment, should they withdraw from their institutional accreditation.

2-2-700 – VOLUNTARY WITHDRAWAL

If an institution seeks to voluntarily withdraw from its grant of accreditation by ACICS, or the inclusion of one or more of its nonmain campuses from within its grant of accreditation, it must submit written notice to ACICS of its request. The notice must be signed by the chief executive or administrative officer of the institution, and indicate the requested date of effect. The institution's grant of accreditation will be revoked as of the effective date, or retroactive to the date that all outstanding obligations, including payment of fees, had previously been fulfilled by the institution.

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:

- (a) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (b) An institution notifies the Council that it is voluntarily withdrawing its grant of accreditation or the inclusion of one or more of its nonmain campuses from within its grant of accreditation.
- (c) ~~(b)~~ An institution or campus fails to submit a written response to a show-cause directive by the indicated due date.
- (d) ~~(e)~~ An institution or campus whose accreditation has been summarily suspended does not challenge or appeal the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (e) ~~(d)~~ The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801-2-1-802.)
- (f) ~~(e)~~ The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

ARTICLE VI

Membership, Fees, and Meetings

Section 2–Loss of Membership. Any member that ceases to be accredited by ACICS shall automatically, and without the necessity for further action, be deemed to be removed from membership. Members may voluntarily ~~resign~~ withdraw pursuant to the procedures described in 2-2-700, which ~~also results in a revocation~~ loss of accreditation. All obligations owed to ACICS, including payment of fees, shall be fulfilled prior to resignation. The loss of accreditation shall be retroactive to the date that all outstanding obligations had previously been fulfilled, if applicable.

2. For Information Only

A. Opportunity to Vacate Show-Cause Directive Following Continued Placements

At the April 2018 meeting, the Council approved a procedural change which will allow for institutions or programs placed on show-cause due to placement, to continue confirmation of the employment for graduates from the previous CAR period, through the PVP. The campus must comply with the directives issued from the show-cause action; however, if the campus continues to confirm, verify, and validate placements for the reporting period which resulted in the show-cause action, it may send a formal request to CAR@acics.org to have that CAR unlocked so to make revisions to the placement data. Once approved, the CAR can only be revised once, and the institution must have placed enough graduates to increase their placement rate above the compliance standard. Once the CAR has been revised and successfully approved, the campus can then make a formal request to the Council to vacate the show-cause action. Institutions are advised

that the revised rate will not replace placement rate initially reported rather, it will serve as additional data for the Council to consider during its next cycle of review.

B. Systematic Review

As ACICS continually strives to enhance its standards to remain current with the best practices in the industry, the Council continues its solicitation of feedback from all stakeholders. As previously described, the Council's 2018 Systematic Review Program includes the areas of Distance Education (Appendix H), English as a Second Language (Appendix F), and the development of standards relevant to institutions outside of the United States. The Council respectfully requests feedback from all parties in these areas, along with the proposed revisions above. Stakeholders with expertise in a particular area are especially invited to contact staff for direct involvement in the continued review and revision of these components of the *Accreditation Criteria*. Requests may be sent to Karly Zeigler, Manager Policy and Institutional Compliance at kzeigler@acics.org.

C. Learning Sites

Effective January 1, 2017, the Council approved a change in the definition of a learning site as outlined in Section 1-3-103 of the *Accreditation Criteria*, which stipulated that learning sites must be located within five miles of the oversight campus or otherwise approved by the Council on a case-by-case basis. Institutions were given until January 1, 2018 to come into compliance with the new definition.

In August 2017, an extension through December 31, 2018, was approved for institutions to re-designate, close, or provide rationale of appropriateness, for any sites located outside of the five-mile radius. This notice is to serve as a reminder and institutions are advised that ACICS will be sending communications to those identified as having active learning sites that do not meet the current definition. This communication will require institutions to respond to the Council concerning the closure, redesignation to branch status, or petition to keep the learning site active with substantive rationale.

D. Graduation Rate Guidelines

ACICS continue to collect graduation information by cohort on the quarterly Campus Accountability Report (CAR) submissions. Graduation rate guidelines were communicated in the January 2018 Memorandum to the Field and are expected to be taken into consideration in the campus's review and evaluation of graduation rates as a component of the Campus Effectiveness Plan (CEP).

E. Termination of Doctoral Programs

As communicated previously, via the Memorandum to the Field and direct correspondence to the institutions offering doctoral programs, ACICS will terminate all doctoral criteria on December 31, 2019, and all doctoral programs would have to be taught out or the institution has transitioned to another accrediting body. ACICS remains committed to this plan while supporting institutions who serve these students.

F. Renewal of Accreditation Workshop

With a number of institutions scheduled to undergo the renewal of accreditation review process, ACICS will be offering a **Renewal Accreditation Workshop** on Tuesday, July 10, 2018, at its offices in Washington, DC. Registration information will be posted on the website shortly.

G. Statement of Accreditation

In light of the recent U.S. Secretary of Education's order reinstating the recognition of ACICS back to December of 2016, institutions are advised that they may update their statement of accreditation in all publications to reflect this status.

3. Comment Survey – Proposed Criteria Revision

The Council encourages students, faculty, administrators, evaluators, employers, and other interested parties to provide feedback regarding proposed revisions to Council policies and procedures. Comments on the proposed Criteria revisions are due by **Friday, June 29, 2018**. ACICS is collecting all comments from the field on proposed Criteria revisions through an electronic survey. Please find the survey link below:
<https://www.surveymonkey.com/r/F7DGP6N>

In preparation for the scheduled AWARE Webinar on Tuesday, May 15th, 2018 to discuss these proposed changed and informational procedures, please send your questions to kzeigler@acics.org to ensure that we are able to provide as much guidance as possible.

For any other questions or to provide policy comments, please contact:

Ms. Karly Zeigler
Manager of Policy and Institutional Compliance
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Case Name: *In the Matter of Accrediting Council for Independent Colleges and Schools*

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit A-O-2

ACICS Placement Verification Report (2018)

THE ACICS PLACEMENT VERIFICATION PROGRAM

2018

MAY 30, 2018

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Context

As an accrediting agency recognized by the U.S. Department of Education, ACICS must demonstrate that it has standards that are rigorous enough to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the schools it accredits, including with respect to success in placing students in positions for which their career focused programs prepare them. 34 C.F.R. § 602.16(a)(1)(i). Further, ACICS must demonstrate that it not only has such standards, but that the agency is effective in its application of the standard to member schools. ACICS understands that this demonstration is critical not just to the Department, but to students, schools, states, taxpayers and the accrediting system as a whole.

The *Accreditation Criteria*, 2-1-809 (Student Achievement Review), provides that the Council reviews the Campus Accountability Report (CAR) to monitor performance in terms of student achievement at both the campus and program levels, including placement rates. When this review indicates that the achievement of an institution's students is below benchmark, the Council will take action consistent with the guidelines outlined in Appendix L, Student Achievement Standards and Campus Accountability Reports.

ACICS should be able to trust placement data submitted to it by schools, but must also be able to verify that data given its critical importance to the mission of the schools it accredits. Traditionally, ACICS had a process for analyzing and reviewing that data. However, as history has shown, that process was not adequate to detect "on the back end" all errors in data submission that had occurred. The development of the ACICS Placement Verification Program (PVP) system is the result of a mission-critical initiative of this agency to strengthen the oversight of placement rate data submissions at the "front end" in a manner that leverages technology and data analytics as an ally.

The PVP system did not emerge quickly, with many lessons learned along the way, and it remains a work in progress. However, this document presents a summary and analysis of the current system, including identified strengths, challenges and opportunities. ACICS is hopeful that through the development and effective implementation of the PVP system, it is serving as an important contributor to identifying best practices among accrediting agencies with regard to verification of student achievement data.

Executive Summary

The PVP relies on a custom-built application to facilitate the submission and review of graduate placement information submitted by ACICS member schools. Hosted in Amazon's cloud, the application is web-based and provides a user-friendly process for the submission of placement information for verification by the graduate and/or the employer directly prior to validation by the ACICS review team.

The value of the system hinges on the direct contact made through the system with the graduate and/or employer to validate the accuracy of the placement information provided by campuses and reported to ACICS. To prevent abuse, the respondent's IP address is captured at that time and compared against that of the submitter. This information is extremely important as it gives the location of the submitter and responders. An IP address is a 32-bit number that uniquely identifies a host on the internet (in this case). For example, the expectation is that the submitter's IP address is located within the campus. The responder's IP address should not be an exact match or within the same network (the first six numbers of the IP address) unless the graduate is placed at the campus. The PVP system also keeps these IP addresses in its database and a report is generated if the responder's IP already exists in the database (see attached Pictorial Overview of the PVP, p.15).

The objective of the system is to strengthen the integrity, reliability, and accuracy of the placement information reported and published by ACICS-accredited institutions to all stakeholders.

The PVP has been fully implemented for almost two years and has been required by all campuses for 18 months (almost two full reporting periods). To date, 91,930 placements have been submitted by 791 unique ACICS IDs. For context, this number includes institutions that are no longer part of the ACICS membership, as well as verifications conducted outside of the annual campus review periods for various purposes.

As a ground-breaking placement verification process in the career education industry, the learning curve has been tremendous for both member institutions as well as ACICS. Being cognizant of that learning curve, ACICS regularly reviews the system to identify areas in need of improvement, how the system can be strengthened, and other opportunities to incorporate the system into the accreditation process to hold the agency and the institutions accountable.

The PVP is still in its infancy and while significant successes have been realized in the areas of credibility and reliability of the data, there is room for improvement. With that in mind, the Council approved the establishment of a Focus Group to provide feedback and recommendations for the modification and enhancement of the PVP system.

Placement Monitoring and Review at ACICS Prior to PVP System

ACICS, as an institutional accreditor of institutions whose missions are to "...offer educational programs which help students develop skills and competencies to enhance their careers" has, for most of its history, emphasized and expected institutions to achieve placement outcomes as a practical reflection of meeting that mission.

Historically, as part of its annual data collection process, the Council has conducted statistical analysis of the placement outcomes of all its institutions, focusing on the average placement rate, as well as the standard deviations from the mean to determine the spread

of the outcomes across all schools and to identify trends that present “at risk” institutions. The results of this analysis have varied from year to year and are sometimes affected, in part, by external factors beyond the control of the institutions such as local economic changes (as in the Midwest) and changes in licensure/certification testing requirements. Further, more than 400 unique programs (using CIP codes) are offered across all ACICS institutions, many of which require additional qualifiers to secure employment such as apprenticeship requirements prior to testing or full-status employment, and/or licensure/registration/certification testing periods which conflict with the CAR reporting period.

In 2012, as part of its self-evaluation for re-recognition with the U.S. Department of Education, the Council took the opportunity to evaluate the appropriateness of the Council's then-existing compliance standards of 52% and 47% for retention and placement respectively. To provide additional context to its review, the standards of similar accrediting agencies were used as part of the basis for the reconsideration of these minimum expectations. As articulated in the July 2012 Memorandum to the Field,

“...the Council believes that ACICS accreditation should guarantee that a majority of students are retained, ...and a majority of graduates are able to find employment related to their fields of study. To ensure this minimum level of student success, ACICS is setting each of these standards, for both the campus and program levels, at 60%...”

The Council also visited for consideration multiple times the definition of what is considered a “placement,” given the range of skills that can be attained from a program or study, the variations in titles used in different industries, and the frequency of the pursuit of additional studies to enhance an individual's current career opportunities. Subsequent to the adoption of the revised 60% rate, feedback from institutions and other interested parties resulted in the revisions to the definition of placement (See January 2013 Memorandum to the Field for final proposed language).

The previous simplistic categories of “in-field” and “related field” were replaced with the following,

“The position is either included in the list of job titles published by the institution for which the program prepares students, 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.”

Additional revisions were made to this definition as the Council continued to gather information from its constituents including institutions, experts in the fields of study, and common practices in the industry including comparison with the current standards of other accrediting agencies. In sum, ACICS has always had and evaluated student achievement standards regarding job placement, using its traditional sampling

methodology of review during the onsite evaluation process, agency benchmarks, placement rate definition, and review processes consistent with the practices of ACCSC, ACCET, and COE, among other nationally accredited agencies. However, more needed to be done to increase public confidence by identifying additional mechanisms to strengthen the reliability of the data collected from institutions on which it could base accurate and fair agency actions.

The genesis of the ACICS “Placement Verification Program” was a survey to the membership in February 2013 to consider a mandate that all ACICS campuses utilize a third-party verification service as then required by at least one other agency. Information on the cost, services provided in the market at that time, and practicality of the service was collected along with a poll of those institutions that had their own internal, yet independent, placement division.

During 2013-2016, ACICS issued surveys, collected responses and analyzed feedback, and beta tested variations of the PVP system. This testing and assessment was critical to being able to launch the current ground-breaking Program. While the PVP system was being developed and tested, the Council took additional steps. In the spring of 2016, the Council developed specific *Accreditation Criteria* language that explicitly held institutions accountable for the integrity and reliability of all and any data reported to the ACICS for any purpose. With this new language, members were put on notice that any discrepancies in submitted data were not mere recordkeeping errors, but would call into question the integrity of the data submission as a whole and the reliability of the school for submitting accurate information to ACICS. Schools were provided clear notice that data errors could be the basis for an institution to show the Council cause why its accreditation should not be withdrawn.

At the same time, the Council also directed the inclusion of a “data integrity reviewer” on every full team site visit, the purpose of which was to focus primarily on the reliability of the placement information reported by institutions on the Campus Accountability Report. With the support of the subject matter experts on the team, the data integrity reviewer was responsible for attempting to contact, via telephone, up to 100% of all graduates reported as placed. The subject matter experts provided practical input on the appropriateness of the placement as disclosed by the campus and confirmed by the graduate or employer. It was also this individual’s responsibility to confirm that acceptable documentation was on file for all graduates classified as not available for placement on the CAR. While in most cases achieving 100% contact was feasible, in others it was not given the number of graduates reported placed by the campus in various programs (i.e., 200 – 300). Also, making phone calls was very time consuming and hit-or-miss, with most businesses available by phone within limited time windows. The ability to make successful contact was also affected frequently by common company policies that prohibit confirmation of employment over the phone or by inability of the company representative reached to

identify or maintain contact information for the appropriate individual. With these issues identified following the initial training and roll out of the program, ACICS conducted a DIR Debrief with the staff and assigned evaluators to determine how the role could achieve more success and efficiency in the Fall 2016 review cycle.

At the beginning of the 2017 CAR period (July 2016), and after years of development with the expected challenges, the Council directed all campuses to submit on a monthly basis placement information using the current PVP system.

Since the system would start with information for the coming year, the Council also directed the incorporation of PVP submissions for January 2016 – June 2016, into the onsite review of campuses on the Fall 2016 evaluation cycle. This exercise provided additional information for the Council's review and helped prepare and train campuses for the monthly submission process.

Further, the Council utilized the services of 3rd Party Verifiers to conduct reviews on historic placement data previously submitted to ACICS on the CAR but which had not gone through the PVP. The 3rd Party Verifiers were contracted by the institution, but selected by ACICS, to ensure objectivity in the selection process. Further, the service was also tasked with conducting graduate and employer satisfaction surveys as part of its verification. The cases in which the service was used helped to address data integrity concerns identified either on a site visit or from external sources. The Council was then able to compare the use of a 3rd Party Verifier against its recently launched PVP.

Development and Implementation of the Placement Verification Program (PVP)

Initially, the system focused on verifying a sample of placement data from randomly selected campuses, particularly those that exhibit increased risks (outcomes, complaints, external information). It also required staff to initiate phone calls to graduates and employers. While this would have been practical with the sampling methodology used by third parties and other accreditors, ACICS determined that an attempt to make contact with 100% of all graduates reported as placed was critical to its ability to rely on the placement data reported by its institutions and overcome lost confidence in its placement review.

As previously outlined, the path to a fully developed PVP system included the use of the onsite data integrity reviewer to focus on placement and third-party verification services. The practices of other agencies, as were readily available, were also reviewed to determine best and most effective practices in the area of placement verification. While beyond the scope of this document, ACICS stands ready to provide more information to the Department, NACIQI, or other stakeholders about the extent of its review of "industry practice" among accrediting agencies regarding placement verification.

To begin its research for development, ACICS conducted an initial survey of the membership in February 2013 (see Appendix A) to evaluate the current use of 3rd Party and Independent Placement Verification services by institutions and to get feedback on the factors that may influence consideration of such services by institutions. From the feedback received, the Council, at its April 2013 meeting, decided to utilize its internal resources, at least for the first phase of the program. Further, the Council asked that the sampling plan be randomized to foreclose any opportunity for manipulating timing of reporting of placements.

The independent verification program was to be performed by a new verification unit to be developed within ACICS. A Member Advisory Committee was established to develop the data submission formats and protocols; define appropriate frequency and intervals for independent verification of each campus's CAR data; set procedures for reconciling differences between submitted and verified placement data; and integrate site-visit verification of back-up documentation with the independent performance audit.

Subsequent to multiple meetings and discussions of the Advisory Committee over a six-month period, its recommendations were forwarded to the membership in October 2013 in the form of another survey to obtain more reaction on how ACICS can best and most effectively obtain the placement information directly from the campuses' student management systems (see Appendix B).

With more than 150 responses received, ACICS hired a consulting firm to assist with the development of the PVP system's requirements. The firm observed visits, reviewed program outcomes and employment options, and held focused meetings with accreditation staff to better understand the complexities of placement review. At its December 2013 meeting, the Council received a report of the current development activities, which included the following excerpt:

Alpha Test (Appendix C of the System)– The Staff Technical Advisory Group is conducting an internal test of the documents and requirements affecting member campuses. These documents will be revised and included in a Rollout of Requirements, scheduled for First Quarter, 2014. Improvements have already been incorporated based on feedback from participants and from our new consultants.

Consultants and Staffing – Due to changes in personnel assigned to lead roles on this project, ACICS has engaged the services of an external consultant to provide interim continuity while a permanent, full-time PVP manager is recruited, hired and on-boarded.

Call Center and Visit Team Roles – The PVP program will build upon and strengthen the placement verification process already provided through the on-site team visit process. The program will have both a call center and a visit team

component, which will be aligned to ensure coordination, consistency and complementarity, while eliminating duplication and discrepancy.

Possible Policy-Related Issues – The PVP program is designed to restore confidence in the promise of career education, which is manifest in the validity of data on the placement of students in jobs related to their field of study. The Council’s new definition includes a significant expansion of the traditional concept of job placement beyond traditional employment in a new, full-time permanent job. This expansion is necessary in order to recognize all the legitimate and demonstrable benefits of career education at a time when the nature of employment is changing in response to economic and political forces. However, other policy makers such as the U.S. Department of Education are considering alternative definitions of placement which differ in some respects from that developed by ACICS. There is no telling whether or not the Department will at some future time mandate that all accreditors utilize this as a common definition. However, it is important that the Council be aware of these differences and related issues.

Armed with a better understanding of the scope of the Program and the system requirements for development, a Request for Proposal (RFP) was sent out in February 2014 with responses from many vendors. Following multiple stages of interviewing and needs assessment, a contract was awarded in April 2014 and development work started in May 2014.

After two months of design production, beta testing began in July 2014, using the member advisory committee institutions as the first pilot. Beta testing was targeted to conclude by June 2014, in order to launch the system on July 1, 2014, for the randomly selected campuses’ submission of placement to begin verification August 1, 2014. This schedule was presented at the December 2013 meeting. However, changes in personnel and necessary revisions to technical requirements impeded that aggressive schedule. Consequently, with beta testing not occurring until spring 2014, the Program was not ready for this initial full-scale launch date.

For the remainder of 2014 and most of 2015, ACICS immersed in an intensive cycle of testing, review, revision, and enhancement, including the drafting of placement documents, training materials, and webinar sessions of the development team and advisory committee. Additionally, visits were conducted to independent verification divisions of member institutions and 3rd party processes reviewed to garner best practices for final testing of the PVP. Critical changes were made to the system including the decision to not connect the campus’s system to ACICS’ in-house review given the variations in systems used, cost to create alignment of systems, and the additional burden to make that model work.

Using the random selection of campus methodology, the system launched in July 2015 for the 2016 CAR period. The system used was an earlier version of the current system, utilizing a spreadsheet for the submission of the data instead of a direct connection between campuses' and ACICS' systems. Campuses were notified the month prior to their selection of that decision and webinars were conducted on a monthly basis to provide training on the use of the system and the submission process. In-house staff managed the calls to and from graduates and employers as well as the validation of placements that were verified by email.

The decision to require the use of the PVP for verification and validation of **all** placement information was made in Winter 2016 for implementation against the 2017 CAR. That is, data from placements reported in July 1, 2017 had to be reported in August 2017, and every month thereafter, for the graduate/employer verification, and subsequent ACICS validation. Informational webinars and guidelines were provided to all campuses in addition to individual consultations to prepare campuses for the transition.

Accessing the PVP System

To access the application, campus representatives simply log into a secure website using information specific to the campus to access the placement data submission template, PVP guidelines, and FAQs. Campuses are required to use the PVP template (see attached Pictorial Overview of the PVP, p.2) to submit their placement data. The template asks for specific data points including graduate name, student ID, program information, placement information, and employer information. Once completed, the user uploads the template into the PVP system, with an option to select a language for the confirmation emails. Languages available represent the breadth of ACICS-accredited institutions and include Spanish, Croatian, Italian, Danish, Chinese, Vietnamese, and English (see Pictorial Overview of the PVP, p.3).

System Review

Upon submission, the system conducts an internal audit to determine if the graduate had not already been submitted to the PVP system. If they have, the system will notify the user that this is a duplicate record and ask if the record should be overwritten with this new information. This review allows for the resubmission of a graduate whose placement was previously incorrect or needed to be revised with more accurate contact information. It also provides campuses with an opportunity to achieve placement standards by resubmitting placement data for graduates whose placements could not be confirmed.

Next, the system checks for any errors in the spreadsheet (data not as expected) relative to data needed for the verification and will reject (and notify the user) any rows with errors. The key data points include full graduate name and ID, graduate e-mail address, placement classification, and any information required for that placement classification.

Once the error-checking has been completed, the system will notify the user as to how many successful entries were added to the database. Data entries with errors are not accepted and would need to be resubmitted. At this point, the system also records the submitter's IP address for future comparison and review (more details in the section below).

Mechanics of Placement Verification – Graduate and Employer

Once the placement data have been successfully uploaded to the system, emails are automatically and instantaneously sent to the graduates and employers using a unique template depending on the language and placement type selected that requests verification of the information provided by the campus ([see Pictorial Overview of PVP, pp.4-6](#)).

The email templates are viewable on any device and designed to not take up more than a single screen. The email recipient is asked to select one of the following responses - confirm the placement information, reject the placement information and provide a correction, request a call back, or leave a comment about the placement. The respondent's IP address is captured at that time and compared against that of the submitter to prevent abuse. As previously noted, an IP address is like a fingerprint. Each IP address is unique to a given location. As such, it is another layer of identity management that ACICS uses to verify that the responders are who they say they are and located where we expect them to be located. The system will attempt to get a response from the graduate OR employer every two weeks up to three attempts. Once the graduate or employer has responded, no additional emails will be sent except if that record is resubmitted and overwritten.

The campus is able to monitor the verification and validation of each record, with the option to contest a negative decision by ACICS ([see Pictorial Overview of the PVP, pp.7-9](#)).

Mechanics of Placement Verification - Administrator

The PVP application functions like a customer service application (a request queue, internal and external comments, escalation workflow, track calls, and uploading of additional documentation). The ACICS Staff Analyst logs into the application with individual ID so that their interactions with the system can be recorded and used for management/ training purposes. The analyst dashboard presents a number of functionalities ([see Pictorial Overview of the PVP, p.8](#)) one of which is the ability to sort verified placement information by campus or by date for review and action. The application also allows the analyst to forward a placement record to a supervisor for guidance when there are questions on the validity of the placement information provided by the campus. These interactions are recorded in the system for training as well as to achieve consistency with the review process.

The placement is marked as *UNABLE TO VERIFY* if there is a response, generally from the employer, that they are unable to verify due to HIPAA or company policy.

Monthly Placements:

This feature allows for the admin staff to review any and all institutions' submitted placements, by month or collectively ([see Pictorial Overview of the PVP, p.11](#)). In 'Monthly Placements,' by clicking on an individual campus, the administrator can view all of the individual graduates submitted by the campus, to include: contact information, the date they were submitted, the graduate cohort, program name and credential level, employer name and contact info, placement date and title, as well as whether the placement was verified and by whom.

Contested Placements:

This is a queue which allows the admin staff to review all of the placements for which the campus has contested the ACICS staff review decision ([see Pictorial Overview of the PVP, p.14](#)). The home screen provides a listing of all those awaiting a final review. There are buttons located at the top through which the admin can view all of those previously reviewed, as well as export the information for a data analysis in Excel.

Upon entering each individual submission, the admin can review the information from the original submission, as well as the explanation and documentation submitted by the campus to evidence the validity of the placement.

Needs Assistance and Response Queue:

The Needs Assistance queue is for any placement review that require additional discussion and consideration by management for consistency. These entries are then reviewed by the manager of the PVP, comments provided, and either back to the Response Queue where the first reviewer can review the guidance and take appropriate action; or the final review may be completed by the manager.

Call Requests:

This feature displays any requests for a phone call that have been submitted by graduates or employers in response to the email verification email. One of the options is for them to request a call from ACICS staff to verify their employment. They choose a date and time that is suitable and upon submission, that is logged here. There is a list view as well as a calendar view. Once the call has been completed, it is marked as verified or unverified, and then marked as 'completed' in the queue.

Fraud Check:

This view allows staff to comparison the IP addresses from the campuses that uploaded the submissions against the IP addresses of the graduate/employer that responded ([see Pictorial Overview of the PVP, p.15](#)). This feature allows ACICS to detect any systemic abuse

of the system through possible fraudulent responses (by the campus on behalf of graduates or employers).

Reports:

This feature allows admin staff to run numerous reports for data collection, to include the following (see Pictorial Overview of the PVP, p. 16):

1. **ACICS Reviewer Activity** – This feature shows an analysis of the actions completed by ACICS staff. The data includes the staff name, action taken, the unique placement ID number, and the date of the action.
2. **ACICS Verification** – This feature is a queue that is utilized by admin staff to review placements that have recently been verified or otherwise responded to by the graduate or employer and are awaiting verification by ACICS. The view is the same as that in Monthly Placements, however it is a compilation of all campuses. It can be filtered and sorted in several ways, as well as exported to Excel for further data management.
3. **ACICS Totals** – The report provides summary totals for the placements that have been submitted. The header provides overall totals for submissions, submissions verified by ACICS, submissions verified by the employer or graduate but not yet by ACICS, as well as the total number of submissions marked invalid by ACICS. The page also lists all of the campuses, with the following data for each: total placements submitted, those that have been verified, the percentage of verified placements, the number of invalid placements, the percentage that are invalid, the number of submissions that have not yet been verified, and the percentage of placements not yet verified.
4. **Institution Submission History** – This report provides the number of placements submitted by a campus every month. The campus ID is entered in the search box and the monthly totals are populated.
5. **Contested Placements Report** – This report is similar to that for the ACICS Totals except the content consists of only placements that have been or are being contested. The header provides overall totals for contested placements, placements contested successfully, placements contested unsuccessfully, and placements awaiting review. The list contains each campus and can be filtered and sorted to view how many have been contested successfully or unsuccessfully and in what category (title, skills, or benefit).
6. **Corrections Report** – This report lists out ever change that a graduate, employer, or ACICS has made to the original information in a campus submission.

7. **Contradictions Report** – This report lists all contradictions in responses between the graduate and the employer (i.e. the graduate verified, but the employer made a correction to some of the information).
8. **Comments Report** - Similarly to the last two, this report is a compilation of all responses where the graduate or employer has included a comment.
9. **Last Upload Report** – This is a basic report which lists the campuses and shows when they last submitted any placements to the PVP as well as the last time they submitted and selected that they had no placements for that month.

Evaluation of the Integrity of the Placement Information

One of four actions can be taken on the review of each placement record:

1. If only one, or both parties, state that the placement information is incorrect, the placement is marked as *INVALID* by ACICS staff.
2. If one, or both parties confirm the placement but it does not meet the definition of a valid placement, it will be marked as *INVALID* by ACICS staff.
3. If only one, or both parties, confirm the placement, and it meets the requirements of a valid placement, as outlined in the Guidelines, ACICS staff mark the placement as *VALID*.
4. If the graduate or employer have conflicting responses, the placement is marked as *INVALID*. Neither party's response is given more weight and since ACICS does not know why the responses conflict (one negative, one positive), it becomes the campus's responsibility to justify the accuracy of the data.

Once an action has been taken on a placement record, it is recorded for the campus's review and follow up. In the cases where the submission is deemed to be *INVALID*, the campus can "contest" that action through the system. To contest the placement decision, the institution must complete a web form and submit backup documentation. The PVP Review team evaluates the substance of the information, which must address the reason(s) identified for rejection, to make a final determination on the acceptability of the placement.

The PVP – CAR Relationship

The CAR, Campus Accountability Report, is the ACICS student matriculation report which tracks every enrollment, by program, into a campus on an annual, and now quarterly basis. Three of the most critical functions of the CAR are the reporting of retention, placement, and more recently graduation rates, at the program and campus levels. Previously, placement information was self-reported by the campus with the expectation that all documentation to support the classification of graduates as placed would be available onsite for ACICS review and verification at any point in time but more specifically during the renewal of accreditation visit. With the successful implementation of the PVP, only

those graduates that have been validated by ACICS can be reported as placed on the CAR. That is, ACICS had to have deemed the placement as appropriate and acceptable for it to be counted into the program 's and campus's placement outcome.

Following the annual submission of the CAR in November, and now on a daily basis for the quarterly report, CAR/PVP error reports are generated by the system to capture, for follow up, those graduates that have been classified as placed but not recorded as a valid placement in the PVP. In these instances, ACICS staff provides the campus with the errors via email and time is given to allow the campus to make the necessary corrections to the report. The Council has taken a conditioning action (Show-cause Directive) against a campus that did not correct such errors as it called into question the integrity of the data submitted to ACICS (Appendix D: Show-Cause Directive to Manhattan School of Computer Technology).

Application of the PVP to Accreditation Review

1. Student Achievement Outcomes Evaluation

The 2017 CAR was the first annual report that included placement information that was linked directly to the PVP. Campuses were advised in various communication about the relationship and their inability to categorize any graduate as placed on the CAR who was not verified and validated in the PVP system. Based on an internal review of PVP submissions and Council actions, there was a direct correlation between the PVP and the placement data on the CAR.

For this reporting period, the Council withdrew the accreditation of two institutions and the approval of three campuses from within the accredited status of their institution for placement outcomes. More than 20 institutions were directed to show-cause why their accreditation, or the continued approval of a campus, should not be withdrawn. With compliance warning being a conditioning action, more than 30 campuses were warned that their underperformance in placement could result in the loss of accreditation and immediate improvements were needed.

Further, more than 500 programs were withdrawn, show-caused, or placed on compliance warning following the Council's review of the 2017 CAR data which were based on the PVP system.

2. Placement Outcomes for the Consideration of Substantive Changes

The Executive Committee, which serves as the Council's substantive change committee, considers placement information submitted to, and validated in the PVP, as part of its review of substantive change applications. Campuses that are unable to demonstrate success in placing students, as verified by the student/graduate and

validated by ACICS, in other programs or similar programs at a lower credential, the Committee will either defer action pending receipt of updated PVP information or deny application if the campus is unable to evidence substantive success in this area.

3. Complaint Reviews

Complaints that are received from students, former students, or graduates concerning the provision of placement services include the review of PVP submissions as part of ACICS' investigation of the merit of the complaint.

Cost and Staffing

The PVP relies on a custom-built application to facilitate the submission and review of graduate placement information that is submitted to ACICS by ACICS member schools. Hosted in Amazon's cloud, the application is web-based and provides a user-friendly process for the submission of placement information for verification by the graduate and/or the employer directly prior to the validation by the ACICS review team.

Using the Amazon Web Services (AWS) cloud allows ACICS to scale and innovate, while maintaining a secure environment. ACICS pays only for the services used. As such, we can have the security and compute power we need, but without the upfront expenses, and at a lower cost than in an on-premises environment. AWS is used by all agencies of the Federal Government and is compliant with many the security standards (including but not limited to CSA, ISO 27001, ISO 27018, SOC2, FISMA and FIPS). For more information on AWS's security compliance, please click [here](#). The PVP application itself uses rights based security to separate data access from individual ACICS members, ACICS analysts, and ACICS supervisors.

The original scope and budget for the program, drafted in 2015 was almost \$50,000. However, to date, almost \$160, 000 has been used for the continued enhancement and development, including staffing, of the system. More specifically, resources were committed to offering the system in six additional languages, and enhancing work flows, data collection mechanisms, and tools within the system. As the system continues to evolve and mature, additional financial resources will be made to facilitate development and quality.

While initial estimations included the use of dedicated staff to the PVP, internal staffing changes at ACICS necessitated reassignment of the PVP responsibilities. This included expanding the scope of the Manager of Policy and Institutional Development to manage the process (previously held by the Vice President of Accreditation Operations); and utilizing the knowledge of an accreditation coordinator to conduct the daily verification and monitoring (previously a Placement Verification Analyst).

A Strategic Analysis of the PVP

The PVP has been fully implemented for almost two years and has been required by all campuses for 18 months (almost two full reporting periods). To date, 91,930 placements have been submitted by 791 unique ACICS IDs. For context, this number includes institutions that are no longer part of the ACICS membership as well as verifications conducted outside of the CAR review periods for various purposes.

As a ground-breaking placement verification process in the career education industry, the learning curve has been tremendous for both institutions as well as ACICS. Being cognizant of that growth, ACICS has included a system of regular review of the system to identify areas in need of improvements, ways the system can be strengthened and other ways it can be incorporated into the accreditation process to hold the agency and the institutions accountable.

STRENGTHS:

1. Confirmation of placement is dependent on the graduate and employer, the two important parties in the process. This information comes directly to ACICS, not through a 3rd party. As a result, ACICS is able to obtain additional information from these two stakeholders including the use of skills, the placement services provided, and any conflicts in the verification (disagreement between the two).
2. ACICS is more efficiently able to identify placement errors including the reporting of placements for unacceptable positions as well as responses from graduates and employers about the accuracy of the placement information. More than 5000 placements were marked as invalid by ACICS because of this. A number of institutions received communication from ACICS and the Council (Appendix E: Letter to Camelot College) concerning its classification of graduates as placed in positions that are not appropriate. In one particular case, the campus's placement rate on the 2017 CAR was 19%.

Further, through the system, staff is able to monitor the verifications by one particular employer or individual, especially if the graduates deny the validity of the placement. This would raise questions on the objectivity of the employer and possible collusion with the campus.

3. ACICS has validated 73,307 or 80% of placements submitted to the PVP. In order for ACICS to validate any placement, it must first be verified by the graduate and/or the employer. Data points that had conflicting verification would not be validated. Onsite, conflicting information would only be obtained if both the graduate and employer were contacted as part of the sample for verification, decreasing the probability of identification. Even with the DIR attempting to make 100% contact,

identifying conflicting placement information between graduate and employer would have been limited.

4. Campuses can electronically submit documentation to contest results for the review of the team. Previously, this was done via email and very time-consuming to review. With an enhancement to the system, the team is able to share their review of the contested placement to make decisions that are consistent with ACICS expectations.

CHALLENGES:

1. Initially, emails were only sent in the English language and did not consider those areas (in the US) and other countries where the primary or most comfortable form of communication was not English. Other languages were added with an option by the campus to select its preference. Formal translation services were secured as well as the involvement from campus administrators in those countries to ensure the substance of the email communication was not lost in translation.
2. Given the interaction between the PVP and the CAR, the alignment of information between the two systems was critical to ensure that ACICS could determine when campuses were not reporting accurate placement information for subsequent action. ACICS has since made changes to the PVP template to ensure it closely aligns with the CAR. The email templates have also been through a few different revisions to ensure the questions to the graduates/ employers were clear and that they had specific and relevant responses to select from.
3. With the breadth and depth of programs at ACICS-accredited institutions, the need for expertise to determine the appropriateness of skills in some areas is challenging. While ACICS staff has the accreditation expertise, the subject-matter experts are volunteer evaluators so there is a current need to expand the pool of PVP Evaluators to ensure accurate review of those programs which include unique skills for placement. The PVP manager is developing a Placement Review Team for this purpose and will continue to refine as needs evolve.
4. For the 2017 CAR, campuses were advised of discrepancies after their submission of the report which was a herculean task for their staff as well as for ACICS. Since then, ACIS has changed the process for comparing the CAR and PVP data so that campuses are notified of any placements that should not be on the CAR. Weekly error reports are generated and communication sent, with details, to the campus on correcting the information (Appendix F: Email communication on CAR/PVP Errors). The goal of this new process is to ensure that only verified placements are used to calculate campus and program level placement rates.

5. While the system boasts an 80% response rate, with some campuses realizing 100% responses from their graduates and employers, ACICS recognizes that email communication is a challenge in some areas for some demographics. This challenge may be beyond the control of the campus if the graduate and/or employer does not use email, or privacy laws, or cultural nuances limit responsiveness. Currently, non-responders are treated as invalid placements, and therefore cannot be considered a placement on the CAR. This adversely affects the program and campus level placement rates. However, ACICS is gathering data on non-responders to develop a sound statistical data model.
6. Changes in personnel at campuses impacted their ability to commit resources and remain up-to-date on the changes and communication from ACICS. To ensure that institutions always had access to the information, regardless of the individual tasked with the responsibility, ACICS created a PVP Resources section in its Member Center which includes FAQs, Guidelines, copy of the spreadsheets, and webinar training sessions. Administrators also always have a point of contact for PVP or CAR related issues.

OPPORTUNITIES:

1. To incorporate the assessment of graduate and employer satisfaction - two requirements of campus effectiveness. With campuses already having to submit to the system, providing an efficient means of collecting satisfaction information at the same time from these two groups would alleviate the campus's need to do another outreach. The results, along with statistical analysis would be easily incorporated into the Campus Effectiveness Plan and stored for historic responses.
2. ACICS believes its PVP system is cutting edge for accrediting agencies and stands willing and able to share lessons learned and its experience with the Department, NACIQI, policy makers, and other agencies.

The Future of the PVP

The PVP is still in its infancy and significant successes have been realized in the areas of credibility and reliability of the data, however there is room for improvement. With that in mind, the Council approved the establishment of a Focus Group to provide feedback and recommendations for the modification and enhancement of the Program.

Appendices

Appendix A: Survey to Membership – February 2013

Request for Feedback: Third-Party & Independent Placement Verification

ACICS is implementing a program to verify campus placement data. This verification may be conducted by a campus' own verifier or, for those campuses that do not conduct their own verification, ACICS will contract with a third-party vendor to conduct the verification.

The purpose of this survey is to identify possible third-party vendors, the factors that might be used to vet them, and the extent to which ACICS institutions are already utilizing third-party and independent verification of their placement data.

If independent verification is provided for your campus at the corporate level, please forward this survey to the appropriate corporate office.

We appreciate your time and feedback. Thank you.

Request for Feedback: Third-Party & Independent Placement Verification

1. Have you considered contracting with a vendor to verify your campus' placement information?

Yes

No

2. If so, which vendors did you consider?

3. If you have contracted with a vendor for this purpose, which vendor are you currently using?

4. Please describe the nature of the services provided by the vendor.

5. What are the main factors you considered in selecting a vendor to provide verification of placement information (e.g., understanding of our sector, organizational capacity, experience with verification, flexibility in working with the school, cost, etc.)?

6. Are there any other factors you believe ACICS should consider in selecting a competent and effective vendor to provide verification of placement information?

7. In addition, do you have an independent, internal process for verification of placements?

Yes

No

8. If so, please describe the job verification process and how it is independent of the campus' job placement process.

Appendix B: Survey to Membership – October 2013

Placement Verification: Membership Feedback

Dear ACICS valued member:

ACICS is developing a verification program based on the definition of placement that was posted and effective as of January 2013. In order to minimize the effort involved for campuses to provide information for this program, please tell us how you prefer to collect and report placement information by completing this brief survey.

Kindly respond by Friday, October 25, 2013. Thank you for your time and valuable feedback.

Recording Placement Information

1. Please describe your internal verification process, if any, prior to recording a completer/ graduate as placed in the ACICS Campus Accountability Report (CAR).

2. What student information system/ database do you use to collect completer/ graduate job placement information?

Placement Verification: Membership Feedback

Collecting Graduate Job Placement Data

In collecting job placement data, please consider the following:

3. How do you collect this information (i.e. in-person meetings, phone, email, social media, etc.)

4. How soon after graduation do you contact the graduate?

5. What day/time elicits the highest response rate?

	Morning	Mid-Day	Evening
Week			
Weekend			

6. Do you ask for the completer/ graduate's specific job responsibilities?

Yes

No

7. If yes to Question 6, how do you collect this information (i.e. from a job description or verbal explanation from the former student)?

8. If yes to Question 6, do you record the job responsibilities in your database?

Yes

No

9. If No to Question 6, how difficult would it be for you to record the job responsibilities in your database?

1- Already in Process

2- Feasible

3- Very Difficult

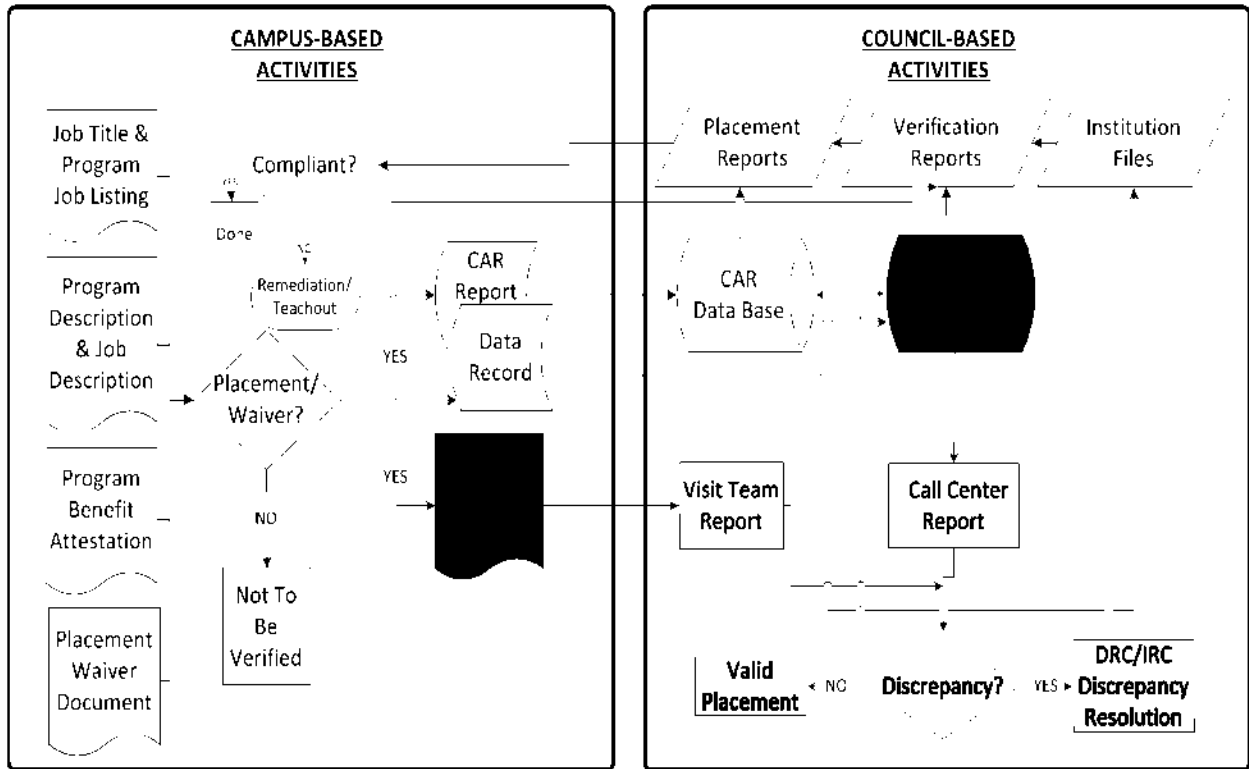
Placement Verification: Membership Feedback

ACICS Collection of Campus Placement Data

10. If ACICS requested that your campus collect and transfer data from your database to us on each completer/ graduate you report as "placed," please rate the feasibility of each of the following:

	Likely	Possible	Unlikely
Transferring the data on each placement within 1 month of internally verifying that placement			
Transferring the monthly placement data in a prescribed Excel spreadsheet or similar report			
Providing the monthly placement data on an ongoing basis			

Appendix C: PVP System 2013



Appendix D: Show-Cause Directive



April 18, 2018

ID Code 00012511 (MC)

VIA E-MAIL AND REGULAR MAIL

info@manhattanschool.edu

Ms. Galina Shumskaya
Director
Manhattan School of Computer Technology
931 Coney Island Avenue, 2nd Floor
Brooklyn, NY 11230

**Subject: Institutional Show-Cause Directive for Unreliable Placement Data on Campus
Accountability Report (CAR)**

Dear Ms. Shumskaya:

The Council, at its February meeting, reviewed the institution's placement data recently resubmitted on the 2017 Campus Accountability Report (CAR) and provided a detailed outline of the inaccuracies that were to be corrected within ten (10) business days following the receipt of the communication. This communication was sent on Monday, March 5, 2018; and to date, after multiple communications, guidance, and attention provided by ACICS staff, the corrected Report has not been submitted. Consequently, the Council is unable to evaluate the institution's placement outcomes for compliance with its standards.

Council Action

Therefore, the Council directs the institution to **show cause at its next scheduled meeting** why its accreditation should not be withdrawn or otherwise suspended for failing to correct the inaccuracies previously identified and accordingly, reporting unreliable placement data.

The institution is reminded that all show-cause reviews are in writing except if specifically directed by the Council to appear in person. Hence, the institution must provide the appropriate notification and fee, as outlined in the Hearing section of the "Schedule of Fees" on the ACICS website, of its intent to respond in writing, within ten (10) business days of receipt of this notice (**May 2, 2018**). Failure to do so will be considered a deviation from the directive of ACICS and result in a withdrawal by suspension action of the institution's accreditation in accordance with Section 2-3-402 of the *Accreditation Criteria*.

In response to this directive, the institution must successfully submit its revised 2017 Campus Accountability Report (CAR) to the ACICS CAR system no later than **May 2, 2018**, at which time the Council will consider vacating the show-cause directive.

Ms. Galina Shumskaya

April 18, 2018

Page 2 of 2

The \$500 CAR revision fee will be invoiced separately and is due upon receipt but no later than the deadline for the submission of the CAR.

The Council is obligated to take adverse action against any institution that fails to come into compliance with the Accreditation Criteria within the established time frames without good cause. Please consult the Introduction of Title II, Chapter 3 of the *Accreditation Criteria* for additional information.

Please contact Ms. LaToya Boyd at lboyd@acics.org or (202) 336-6777 if you have any questions or need assistance with the revision process.

Sincerely,

(b)(6)

Michelle Edwards
President and CEO

c: Ms. Cathy Sheffield, U.S. Department of Education, Accreditation and State Liaison
Dr. Richard Rose, New York State Education Department (richard.rose@nysed.gov)

Appendix E: Communication to Campuses



December 16, 2016

ID Code 00011311(MC)

VIA E-MAIL ONLY

Rev. Ronnie L. Williams
President
Camelot College
2618 Wooddale Boulevard, Suite A
Baton Rouge, LA 70805

home@camelotcollege.com

Subject: Appeal to Council of ACICS Staff PVP Review Decisions/Rejections

Dear Rev. Williams:

The Council has reviewed and considered the institution's appeal of the ACICS staff's decision to consider invalid the placements of Advanced Medical Assistant (AMA) graduates in phlebotomy, mental health tech, and certified nursing assistant positions; and Cosmetology graduates in Mary Kay positions, as placed by skills. While much of a curriculum argument was not provided for the Cosmetology program, according to the institution, "...the above three disciplines are major training components in our Advanced Medical Assistant program".

However, the Council's review of the AMA curriculum provided in the institution's request indicate that Phlebotomy is an 80-hour, 2 credit course; Nurse Aid Training is an 80-hour, 4-credit course; and Mental Health Tech is another 80-hour, 4-credit course. Hence, these "disciplines", independently, are not major training components of the AMA curriculum.

The Council also considered the institution's argument that during its most recent renewal of accreditation visit the ACICS review team accepted these placements as appropriate. While the Council empathizes with the institution on the confusion that this may cause, it is important that the institution recognizes that the Council has purposefully strengthened and clarified in numerous webinars and memoranda to the field its heightened expectations on placements since that review cycle.

As a result of its thorough consideration of the institution's request, including the attestations from graduates and employers, the Council has determined that the staff's analysis and review are consistent with its expectations on the interpretation of the placement definition and the institution must submit the following to the Council:

- I. The placement documentation to support all graduates classified as placed on the 2016 Campus Accountability Report (CAR) along with documents to support those classified as not available for placement.

December 16, 2016

Rev. Williams

Page 2 of 2

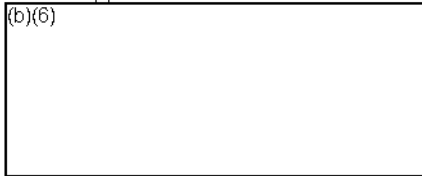
2. Revised publication and advertising materials, including the catalog, web site, and brochures, to accurately reflect the objectives of the Advanced Medical Assistant and Cosmetology programs, removing all references to careers in those areas identified as inappropriate – Mary Kay Consultant, Phlebotomy, Mental Health Tech, and Certified Nurse Assistant.

Further, the institution needs to address the serious disconnect between statements of concern for its students in the context of comparative high costs and length of training for enrollees in the AMA program being routed into low-level paying jobs for CNAs, by example, when shorter and cheaper options would have better served their interest relative to the outcome.

The requested information must be submitted to the Council's office via car@acics.org no later than **February 28, 2017**. Failure to submit the information as requested may result in an adverse action against the institution. If you have any questions, please contact me at pwgilliam@acics.org.

Sincerely,

(b)(6)



Perliter Walters-Gilliam

Vice President – Accreditation

- c. Mr. Roger J. Williams, Interim President (rjwilliams@acics.org)
Dr. Terron King, Senior Manager, Institutional and Program Review (tking@acics.org)

From: Perliter Walters-Gilliam
To: "ccpresid@aol.com"
Cc: [Roger J Williams](mailto:Roger_J_Williams)
Subject: RE: PVP (Camelot College-00011311)
Date: Wednesday, October 19, 2016 3:18:00 PM

Dear Pastor Williams:

This is to follow up on our telephone call on Monday concerning your response to Mr. Williams, relative to the placement of CNAs and Mental Health Techs from the Advanced Medical Assistant (AMA) program. To ensure that we are clear, it is necessary that I reiterate ACICS' position. We do not consider these placements to be appropriate, and the campus has been invited to submit, for the Council's consideration, documentation to support its position that these placements justify the \$13,897.81 investment in the AMA program. However, the monthly PVP submissions will be validated from ACICS' position. Please email these materials Mr. William's attention and we will process them accordingly. Thank you.

Ms. Perliter Walters-Gilliam

Associate Vice President - Accreditation

Accrediting Council for Independent Colleges and Schools

750 First Street, NE Suite 980 Washington, DC 20002

www.acics.org 202.336.6769 - p 202.421.5935 - c

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From: "ccpresid@aol.com" <ccpresid@aol.com>

Date: Sunday, October 16, 2016 at 4:19 PM

To: Roger J Williams <rjwilliams@acics.org>

Subject: Fwd: PVP (Camelot College-00011311)

Mr. Roger Williams,

Thank you for your guidance in your October 12, 2016, letter. I sincerely apologize for giving the perception that we were resisting the guidance of the organization [ACICS] that initially gave us the opportunity twenty-six years ago to help thousands of graduates to have successful career jobs. Please know that we would never resist the guidance of our Accrediting Commission and we are fully aware of the pending ACICS Petition for Re-recognition with the Department of Education. My letter to [REDACTED] was only intended to inform our Commission that some of our graduates who were classified as CNA's are performing Medical Assistant tasks such as Computerized Patient Charting, Initial Patient Assessments, Vital Sign Checks and other Medical Assistant tasks also on their jobs

as we identified in our recent survey. **We inadvertently classified them by Title Match in the PVP system instead of placing them by Skills Match.** I am referring to the guidance we received in the Placement Verification Program Guidelines on ACICS website. Respectfully, we know that students who graduated from a six week or short term CNA school could not perform the Medical Assistant skills that our graduates perform. Again, respectfully, this is the reason why The Baton Rouge General approached Camelot with the concept of adding more skill sets to the Medical Assistant program in an effort to hire more qualified health care professionals. These skills can be validated by speaking with our graduates or their employers. Also, I would love to have an opportunity to speak with you more on this issue and to speak with you on our outreach efforts to our Louisiana Congressional Delegation with regards to the pending decision by the Secretary of Education. Please call me at 225-907-3310 or give a time that you could be available for me to call you.

Again respectfully,

Pastor Ronnie L. Williams

From: [PVP review](#)
To: ccopt@hunterbusinessschool.edu
Cc: [PVP review](#); [Perlter Walters-Gilliam](#); [Roger J Williams](#)
Subject: RE: PVP Submission Concerns
Date: Thursday, February 16, 2017 4:45:18 PM
Attachments: [image001.png](#)
[image002.png](#)

Dear Mr. Copt,

The PVP review committee as well as an additional subject specialist reviewed the information that you submitted regarding the PVP submissions for the Medical Office Administration and Medical Assistant programs. Upon review the committee has determined the following:

The Medical Office Administration placements are suitable placements based on the skills presented. Based on the curriculum reviewed, predominant skills from the program are utilized in the positions. However, please be advised that the question of the appropriateness of the CIP code remains and will be addressed in the renewal of accreditation review at the Council's April meeting.

For the phlebotomy placement of the medical assistant graduates, the committee affirms the staff decision regarding the phlebotomy placements as invalid. Although graduates in such placements may be using some skills from various courses, the assessment is that the placement does not require the use of predominant skills from the program as a whole. Secondly, while employers may prefer graduates of a medical assisting program due to the additional skills they attain, these additional skills, for which the graduate invested extra resources to obtain, may be utilized in positions that more closely align with the training received.

Regards,

Karly Zeigler

Manager, Institutional Compliance
Accrediting Council for Independent Colleges and Schools

From: Perlter Walters-Gilliam
Sent: Thursday, January 26, 2017 9:25 AM
To: chuck copt
Cc: Karly Zeigler; Corrisa Barker; Roger J Williams
Subject: RE: PVP Submission Concerns

Good morning Mr. Copt

Thank you for your detailed response. The PVP Review Team will meet to discuss and I will follow up at my earliest opportunity.

Ms. Perlter Walters-Gilliam
Vice President Accreditation
Accrediting Council for Independent Colleges and Schools
750 First Street, NE Suite 980 Washington, DC 20002
www.acics.org 202.336.6769 p

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From: chuck copt [mailto:ccoapt@hunterbusinessschool.edu]
Sent: Wednesday, January 25, 2017 5:21 PM
To: Perliter Walters-Gilliam
Subject: FW: PVP Submission Concerns

Dear Ms. Walters-Gilliam:

As indicated in my previous email, I received the letter that you submitted to [REDACTED] on January 13, 2017 concerning the "PVP" criteria. Your response left our management team with several questions and concerns that we would like to address.

General Office Placement for Graduates from the Medical Office Administration program:

In your response you indicate that we should change the program description in our catalog, on our website, and any other publication to no longer make reference to the "business environment". If we remove the wording "business environment" from the program description found in our catalog and published on our website and replace it with the wording "general office skills", will this then meet the criteria that ACICS uses thereby allowing our institution to place students in a "general office" setting outside of the health care field providing the student is utilizing a predominant number of skills that were acquired in the courses that focus on "general office" skills? Please advise.

Placements Pertaining to Phlebotomy:

We were initially waiting for a letter from LabCorp which is a national laboratory testing company. The letter was to support the need for trained Medical Assistants from Hunter as a requirement to work as a phlebotomist. We have been waiting for the Regional Field Supervisor to forward the letter to their Corporate Human Resources department for approval before sending it on to Hunter Business School. We decided to submit the following supportive information and then forward the letter from [REDACTED] Regional Supervisor, LabCorp in a separate email.

As you point out, there must be predominant use of skills from the program in the position to make it a valid placement, however in your letter you consider Phlebotomy one skill learned as part of the larger set of skills obtained from the program. Our students are only placed as phlebotomists at two National Laboratories who typically only hire employees with more than 1 year of work experience. In their job postings LabCorp advertises for PST Patient Services Technician (*see attached posting*) and Quest Diagnostics uses the title Phlebotomy Services Rep I (*see attached posting*). We used the job title phlebotomist as an easy way to identify the type of work the students do. Would it help if we change the titles that we have been using for these two organizations to match the title in the job postings? Both LabCorp and Quest Diagnostics make an exception for our students because of their education and training at our institution, in which our Medical Assistant program has programmatic accreditation by the Commission on Accreditation of Allied Health Education Programs since 2013 (*letter from LabCorp to follow in a separate email*).

In your letter you stated that phlebotomy is covered in two courses along with Laboratory Procedures (120) hours. This is 120 hours in a 910-hour program which represents 13% of the program. It is our assertion that the phlebotomy placements that we state as placements are skills-based and utilize 73% of the total curriculum. If you look at the job description found below from Quest Diagnostics, 667 hours out of the 910 hours offered in our Medical Assistant program are actually utilized within the job description. They

require students to utilize skills that have been taught within the following courses:

- MA101A: Asepsis & Assisting with Minor Surgery (27) hrs
- MA102: Communication & Human Relations (60) hrs
- MA201 Urinalysis & Microbiology (60) hrs
- MA202: Keyboarding with Microsoft Word (60) hrs
- MA301 Phlebotomy & Laboratory Procedures I (60) hrs
- MA401: Phlebotomy & Laboratory Procedures II (60) hrs
- MA501: Clinical skills (60) hrs
- MA502: Medical Administrative & Business Practices (60) hrs
- MA602 Computerized Medical Billing & EMR (60) hrs
- MA801: Externship (160) hrs

Below is the job description from Quest Laboratories that we've used in determining that our placements meet the skills-based requirements set forth by ACICS, which is: "Any graduate or completer of a program that was placed based upon the required use of skills learned in the student's program as a predominant component of the job. These skills must be those listed in the institution's published program description and a majority of these skills must be documented in the employer's job description as required or desired skills, duties or responsibilities".

Quest Diagnostics Job Description Job Title:	Phlebotomy Services Rep I	Job Family:	Laboratory
Reports To:	Field Operations Manager	Grade	

Basic Purpose:

Under the direction of the area supervisor, perform daily activities of the Patient Service Center /Mobile/In-office Phlebotomy accurately and on time. Maintain a safe and professional environment. Performs with confidence, both the forensic and clinical specimen collection and processing duties following established practices and procedures. Maintains required records and documentation. Demonstrates organizational commitment and promotes a positive image to patients, clients, employees and the public in general.

Duties and Responsibilities:

- 1 Greet customers appropriately. Treat all customers in a courteous manner
- 2 Ensures all field phlebotomy and PSC specimens are collected accurately and on time.
 - a. Collects specimens according to established procedures.
 - b. Responsible for completing requisitions accurately.
 - c. Call clients to confirm handwritten orders, verify test(s) ordered, obtain accurate billing information, i.e. Diagnosis codes, UPIN information, etc.
 - d. Research test/client information utilizing lab computer system or Directory of Service.
 - e. Label, centrifuge, split, and freeze specimens as required by test order.
 - f. Package specimens for transport.
 - g. Administers glucose, lactose and d-xylose oral solutions according to established training.
- 3 Maintains required records and documentation.
 - a. Reads, understands and complies with departmental policies, protocols and procedures: (i.e. Procedure Manuals, Safety Manual, Compliance Manual, Automobile policies and procedures, Employee Handbook, Quality Assurance Manual).
 - b. Maintains all appropriate PSC/Phlebotomy logs.
 - c. Assist with compilation of monthly statistics and data. Submits data on time monthly.
 - d. Perform basic clerical duties, i.e. filing, faxing, preparing mail. Will be required to perform electronic data entry.
 - e. Submits accurate time and travel logs as directed by management and on time.
 - f. Submits accurate expense forms, if applicable, on the required day.
- 4 Demonstrates organizational commitment.

- a. Adheres to departmental and company code of grooming and dress code and lab coat policies, appearing neat and clean at all times.
 - b. Reports on time to work, following attendance guidelines.
 - c. Answers the telephone in a friendly and helpful manner, by incorporating the company name, self-identification and a helpful statement
 - d. Communicates appropriately with clients, patients, coworkers and the general public.
 - e. Communicates all unresolved problems immediately to the appropriate Manager, Supervisor, Group Leader or PSR II for resolution. Remains polite and courteous at all time.
- 5 Miscellaneous duties and responsibilities.
- a. Keeps work area neat and clean. Disposes of biohazard containers when scheduled.
 - b. Help with inventories and other tasks as assigned.
 - c. Stock supplies as needed.
 - d. Performs other department-related clerical duties when assigned.
 - e. Answers phone and dispatch calls when assigned.
 - f. Participates on teams and special projects when asked.

Qualifications:

Education Preferred:	BS with DMLT/B.Sc (MLT)
Work Experience:	1 year phlebotomy experience. Customer service in a service environment.
Other:	Must be flexible and available based on staffing requirements: weekends, holidays, on call and overtime. Excellent phlebotomy skills to include pediatric and geriatric. Demonstrates good organization, communication, and interpersonal skills, is able to manage concerns of patients and employees in a professional manner. Capable of handling multiple priorities in a high volume setting Ability to perform data-entry .

Additionally, we encourage our students to certify themselves through the American Medical Technologists as a Registered Medical Assistant which is one of the leading certifying organizations for Medical Assistants. This exam, encompasses Medical Assisting, EKG Technician and Phlebotomist. If they want to be certified only in Phlebotomy (especially after obtaining a job offer from Quest), below is the content of the American Medical Technologists Phlebotomy Exam.

**AMT Registered Phlebotomy Technician (RPT)
Certification Examination Construction Parameters**

Number of items in category

Category, Sub-category, and Competency

I. Obtaining Blood Samples (41.5% of test)

- A. Identify correct patient properly
- B. Select appropriate containers for specimens and know requirements for container identification
- C. Know physiological aspects of blood collection
- D. Prepare patient for various tests
- E. Select proper venipuncture site
- F. Perform venipunctures
- G. Collect specimen in proper tube-draw sequence
- H. Perform skin punctures
- I. Perform heel punctures on infants
- J. Provide proper post care of venous, arterial, & skin puncture sites
- K. Handle blood samples to maintain specimen integrity

L. Label transfusion services (blood bank) specimens according to proper Protocol

Hunter's Courses in which above is learned:

- a. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- b. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- c. *MA:801 Externship (160 hrs)*

II. Specimen Collection and Processing (15.5% of test)

- A. Properly handle non-blood specimens to maintain their integrity
- B. Properly collect and handle specimens with time/temperature requirements
- C. Properly collect and handle specimens for blood cultures
- D. Select proper station for specimen delivery
- E. Process specimens for shipping
- F. Instruct patient in the collection of urine specimens
- G. Instruct patient in the collection of other specimens
- H. Collect and process point-of-care testing (POCT) specimens

Hunter's courses in which the above is learned

- a. *MA:201 Urinalysis and Microbiology (60 hrs)*
- b. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- c. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- d. *MA:801 Externship (160 hrs)*

III. Time Management and Assignment Organization (8.0% of test)

- A. Read physician orders and requisitions
- B. Set priorities for specimen collection
- C. Schedule time intervals for tolerance tests
- D. Schedule time intervals for drug-dependent tests
- E. Refer problems to supervisor appropriately
- F. Cooperate with co-workers in the completion of assignments

Hunter's Courses in which the above is learned

- a. *MA:502 Medical Administrative and Business Practices (60 hrs)*
- b. *MA: 102 Communication and Human Relations (60 hrs)*
- c. *MA:101B Pharmacology (33 hrs)*
- d. *MA:801 Externship (160 hrs)*

IV. Professional Communications (4.5% of test)

- A. Develop and use proper and professional communication skills with staff, patients, and families
- B. Use proper technique and etiquette for answering the telephone
- C. Inform patients of special test requirements

Hunter's courses in which the above is learned

- a. *MA: 102 Communication and Human Relations (60 hrs)*
- b. *MA:801 Externship (160 hrs)*

V. Clerical Skills and Duties (5.5% of test)

- A. Chart or file laboratory-generated reports properly
- B. Enter, retrieve, and verify patient collection data and special notations using appropriate sources
- C. Maintain inventory levels, order and restock supplies
- D. Employ computer skills

Hunter's courses in which the above is learned

- a. *MA:202 Keyboarding with Microsoft Word (60 hrs)*
- b. *MA:602 Computerized Billing*
- c. *MA:102 Communication and Human Relations (60 hrs)*
- d. *MA:801 Externship (160 hrs)*

VI. Safety Standards and Procedures (10.0% of test)

- A. Identify appropriate regulatory and standard-setting agencies
- B. Know the use of material safety data sheets
- C. Employ Universal/Standard precautions
- D. Employ infection control and isolation techniques
- E. Recognize patient problems related to syncope, nausea, and other complications

Hunter's courses in which the above is learned

- a. *MA:102 Communication and Human Relations (60 hrs)*
- b. *MA:101A Asepsis (27 hrs)*
- c. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- d. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- e. *MA:801 Externship (160 hrs)*

VII. Legal, Ethical, and Professional Considerations (6.0% of test)

- A. Know principles of liability regarding the practice of phlebotomy
- B. Perform duties professionally, ethically, and legally, adhering to criminal justice and civil rights acts
- C. Employ professional conduct and appearance in the performance of duties

Hunter's courses in which the above is learned

- a. *MA:102 Communication and Human Relations (60 hrs)*
- b. *MA:801 Externship (160hrs)*

VIII. Terminology, Anatomy, and Physiology (9.0% of test)

- A. Employ basic terminology including suffixes, prefixes, and root words
- B. Know basic anatomy
- C. Know basic physiological systems

Hunter's courses in which the above are learned

- a. *MA:302 A&P I with Medical Terminology (60 hrs)*
- b. *MA:402 A&P II with Medical Terminology (60 hrs)*
- c. *MA:801 Externship (160 hrs)*

As you can see, even if you do not include the externship, our students must learn 65.9% of the total Medical Assistant Program in order to pass the AMT Phlebotomy Exam.

We are looking to resolve these issues as quickly as possible so that we may continue to support our students in finding them employment that meets their career aspirations and the criteria set forth by ACICS. Thank you in advance for you time, we look forward to your response.

Sincerely,

Chuck Copt

Chuck Copt

Director of Education & Evening School Director



Hunter Business School

Brookhaven Executive Center

3247 Route 112 Bldg. 3

Medford, NY 11763

(631) 736-7360 Ext. 116

www.hunterbusinessschool.edu



From: Perliter Walters-Gilliam
To: [Ms. Tibby Loveman](mailto:Ms_Tibby_Loveman)
Cc: [Roger J Williams](mailto:Roger_J_Williams); [PVP review](#)
Subject: FW: PVP Submission Concerns
Date: Tuesday, February 07, 2017 1:44:00 PM
Attachments: [PST Specialist - Flushing Queens - NY at LABORATORY CORP OF AMERICA HOLDINGS.pdf](#)
[Quest phlebotomy job description.pdf](#)
[RPT Content Outline detail.pdf](#)
[image002.png](#)
[image003.png](#)

campus response below...

From: chuck copt [mailto:ccopt@hunterbusinessschool.edu]
Sent: Wednesday, January 25, 2017 5:21 PM
To: Perliter Walters-Gilliam
Subject: FW: PVP Submission Concerns

Dear Ms. Walters-Gilliam:

As indicated in my previous email, I received the letter that you submitted to [REDACTED] on January 13, 2017 concerning the "PVP" criteria. Your response left our management team with several questions and concerns that we would like to address.

General Office Placement for Graduates from the Medical Office Administration program:

In your response you indicate that we should change the program description in our catalog, on our website, and any other publication to no longer make reference to the "business environment". If we remove the wording "business environment" from the program description found in our catalog and published on our website and replace it with the wording "general office skills", will this then meet the criteria that ACICS uses thereby allowing our institution to place students in a "general office" setting outside of the health care field providing the student is utilizing a predominant number of skills that were acquired in the courses that focus on "general office" skills? Please advise.

Placements Pertaining to Phlebotomy:

We were initially waiting for a letter from LabCorp which is a national laboratory testing company. The letter was to support the need for trained Medical Assistants from Hunter as a requirement to work as a phlebotomist. We have been waiting for the Regional Field Supervisor to forward the letter to their Corporate Human Resources department for approval before sending it on to Hunter Business School. We decided to submit the following supportive information and then forward the letter from [REDACTED] Regional Supervisor, LabCorp in a separate email.

As you point out, there must be predominant use of skills from the program in the position to make it a valid placement, however in your letter you consider Phlebotomy one skill learned as part of the larger set of skills obtained from the program. Our students are only placed as phlebotomists at two National Laboratories who typically only hire employees with more than 1 year of work experience. In their job postings LabCorp advertises for PST Patient Services Technician (*see attached posting*) and Quest Diagnostics uses the title Phlebotomy Services Rep I (*see attached posting*). We used the job title phlebotomist as an easy way to identify the type of work the students do. Would it help if we change the titles that we have been using for these two organizations to match the title in the job postings? Both LabCorp and Quest Diagnostics make an exception for our students because of their education and training at our institution, in which our Medical Assistant program has programmatic accreditation by the Commission on Accreditation of Allied Health Education Programs since 2013 (*letter from LabCorp to follow in a separate email*).

In your letter you stated that phlebotomy is covered in two courses along with Laboratory Procedures

(120) hours. This is 120 hours in a 910-hour program which represents 13% of the program. It is our assertion that the phlebotomy placements that we state as placements are skills-based and utilize 73% of the total curriculum. If you look at the job description found below from Quest Diagnostics, 667 hours out of the 910 hours offered in our Medical Assistant program are actually utilized within the job description. They require students to utilize skills that have been taught within the following courses:

- MA101A: Asepsis & Assisting with Minor Surgery (27) hrs
- MA102: Communication & Human Relations (60) hrs
- MA201 Urinalysis & Microbiology (60) hrs
- MA202: Keyboarding with Microsoft Word (60) hrs
- MA301 Phlebotomy & Laboratory Procedures I (60) hrs
- MA401: Phlebotomy & Laboratory Procedures II (60) hrs
- MA501: Clinical skills (60) hrs
- MA502: Medical Administrative & Business Practices (60) hrs
- MA602 Computerized Medical Billing & EMR (60) hrs
- MA801: Externship (160) hrs

Below is the job description from Quest Laboratories that we've used in determining that our placements meet the skills-based requirements set forth by ACICS, which is: "Any graduate or completer of a program that was placed based upon the required use of skills learned in the student's program as a predominant component of the job. These skills must be those listed in the institution's published program description and a majority of these skills must be documented in the employer's job description as required or desired skills, duties or responsibilities".

Quest Diagnostics Job Description Job Title:	Phlebotomy Services Rep I	Job Family:	Laboratory
Reports To:	Field Operations Manager	Grade	

Basic Purpose:

Under the direction of the area supervisor, perform daily activities of the Patient Service Center /Mobile/In-office Phlebotomy accurately and on time. Maintain a safe and professional environment. Performs with confidence, both the forensic and clinical specimen collection and processing duties following established practices and procedures. Maintains required records and documentation. Demonstrates organizational commitment and promotes a positive image to patients, clients, employees and the public in general.

Duties and Responsibilities:

- 1 Greet customers appropriately. Treat all customers in a courteous manner
- 2 Ensures all field phlebotomy and PSC specimens are collected accurately and on time.
 - a. Collects specimens according to established procedures.
 - b. Responsible for completing requisitions accurately.
 - c. Call clients to confirm handwritten orders, verify test(s) ordered, obtain accurate billing information, i.e. Diagnosis codes, UPIN information, etc.
 - d. Research test/client information utilizing lab computer system or Directory of Service.
 - e. Label, centrifuge, split, and freeze specimens as required by test order.
 - f. Package specimens for transport.
 - g. Administers glucose, lactose and d-xylose oral solutions according to established training.
- 3 Maintains required records and documentation.
 - a. Reads, understands and complies with departmental policies, protocols and procedures: (i.e. Procedure Manuals, Safety Manual, Compliance Manual, Automobile policies and procedures, Employee Handbook, Quality Assurance Manual).
 - b. Maintains all appropriate PSC/Phlebotomy logs.
 - c. Assist with compilation of monthly statistics and data. Submits data on time monthly.

- d. Perform basic clerical duties, i.e. filing, faxing, preparing mail. Will be required to perform electronic data entry.
- e. Submits accurate time and travel logs as directed by management and on time.
- f. Submits accurate expense forms, if applicable, on the required day.
- 4 Demonstrates organizational commitment.
 - a. Adheres to departmental and company code of grooming and dress code and lab coat policies, appearing neat and clean at all times.
 - b. Reports on time to work, following attendance guidelines.
 - c. Answers the telephone in a friendly and helpful manner, by incorporating the company name, self-identification and a helpful statement
 - d. Communicates appropriately with clients, patients, coworkers and the general public.
 - e. Communicates all unresolved problems immediately to the appropriate Manager, Supervisor, Group Leader or PSR II for resolution. Remains polite and courteous at all time.
- 5 Miscellaneous duties and responsibilities.
 - a. Keeps work area neat and clean. Disposes of biohazard containers when scheduled.
 - b. Help with inventories and other tasks as assigned.
 - c. Stock supplies as needed.
 - d. Performs other department-related clerical duties when assigned.
 - e. Answers phone and dispatch calls when assigned.
 - f. Participates on teams and special projects when asked.

Qualifications:

Education Preferred:	BS with DMLT/B.Sc (MLT)
Work Experience:	1 year phlebotomy experience. Customer service in a service environment.
Other:	Must be flexible and available based on staffing requirements; weekends, holidays, on call and overtime. Excellent phlebotomy skills to include pediatric and geriatric. Demonstrates good organization, communication, and interpersonal skills, is able to manage concerns of patients and employees in a professional manner. Capable of handling multiple priorities in a high volume setting Ability to perform data-entry.

Additionally, we encourage our students to certify themselves through the American Medical Technologists as a Registered Medical Assistant which is one of the leading certifying organizations for Medical Assistants. This exam, encompasses Medical Assisting, EKG Technician and Phlebotomist. If they want to be certified only in Phlebotomy (especially after obtaining a job offer from Quest), below is the content of the American Medical Technologists Phlebotomy Exam.

**AMT Registered Phlebotomy Technician (RPT)
Certification Examination Construction Parameters**

Number of items in category

Category, Sub-category, and Competency

I. Obtaining Blood Samples (41.5% of test)

- A. Identify correct patient properly
- B. Select appropriate containers for specimens and know requirements for container identification
- C. Know physiological aspects of blood collection
- D. Prepare patient for various tests
- E. Select proper venipuncture site

- F. Perform venipunctures
- G. Collect specimen in proper tube-draw sequence
- H. Perform skin punctures
- I. Perform heel punctures on infants
- J. Provide proper post care of venous, arterial, & skin puncture sites
- K. Handle blood samples to maintain specimen integrity
- L. Label transfusion services (blood bank) specimens according to proper Protocol

Hunter's Courses in which above is learned:

- a. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- b. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- c. *MA:801 Externship (160 hrs)*

II. Specimen Collection and Processing (15.5% of test)

- A. Properly handle non-blood specimens to maintain their integrity
- B. Properly collect and handle specimens with time/temperature requirements
- C. Properly collect and handle specimens for blood cultures
- D. Select proper station for specimen delivery
- E. Process specimens for shipping
- F. Instruct patient in the collection of urine specimens
- G. Instruct patient in the collection of other specimens
- H. Collect and process point-of-care testing (POCT) specimens

Hunter's courses in which the above is learned

- a. *MA:201 Urinalysis and Microbiology (60 hrs)*
- b. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- c. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- d. *MA:801 Externship (160 hrs)*

III. Time Management and Assignment Organization (8.0% of test)

- A. Read physician orders and requisitions
- B. Set priorities for specimen collection
- C. Schedule time intervals for tolerance tests
- D. Schedule time intervals for drug-dependent tests
- E. Refer problems to supervisor appropriately
- F. Cooperate with co-workers in the completion of assignments

Hunter's Courses in which the above is learned

- a. *MA:502 Medical Administrative and Business Practices (60 hrs)*
- b. *MA: 102 Communication and Human Relations (60 hrs)*
- c. *MA:101B Pharmacology (33 hrs)*
- d. *MA:801 Externship (160 hrs)*

IV. Professional Communications (4.5% of test)

- A. Develop and use proper and professional communication skills with staff, patients, and families
- B. Use proper technique and etiquette for answering the telephone
- C. Inform patients of special test requirements

Hunter's courses in which the above is learned

- a. *MA: 102 Communication and Human Relations (60 hrs)*
- b. *MA:801 Externship (160 hrs)*

V. Clerical Skills and Duties (5.5% of test)

- A. Chart or file laboratory-generated reports properly
- B. Enter, retrieve, and verify patient collection data and special notations using appropriate sources
- C. Maintain inventory levels, order and restock supplies
- D. Employ computer skills

Hunter's courses in which the above is learned

- a. *MA:202 Keyboarding with Microsoft Word (60 hrs)*
- b. *MA:602 Computerized Billing*
- c. *MA:102 Communication and Human Relations (60 hrs)*
- d. *MA:801 Externship (160 hrs)*

VI. Safety Standards and Procedures (10.0% of test)

- A. Identify appropriate regulatory and standard-setting agencies
- B. Know the use of material safety data sheets
- C. Employ Universal/Standard precautions
- D. Employ infection control and isolation techniques
- E. Recognize patient problems related to syncope, nausea, and other complications

Hunter's courses in which the above is learned

- a. *MA:102 Communication and Human Relations (60 hrs)*
- b. *MA:101A Asepsis (27 hrs)*
- c. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- d. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- e. *MA:801 Externship (160 hrs)*

VII. Legal, Ethical, and Professional Considerations (6.0% of test)

- A. Know principles of liability regarding the practice of phlebotomy
- B. Perform duties professionally, ethically, and legally, adhering to criminal justice and civil rights acts
- C. Employ professional conduct and appearance in the performance of duties

Hunter's courses in which the above is learned

- a. *MA:102 Communication and Human Relations (60 hrs)*
- b. *MA:801 Externship (160hrs)*

VIII. Terminology, Anatomy, and Physiology (9.0% of test)

- A. Employ basic terminology including suffixes, prefixes, and root words
- B. Know basic anatomy
- C. Know basic physiological systems

Hunter's courses in which the above are learned

- a. *MA:302 A&P I with Medical Terminology (60 hrs)*
- b. *MA:402 A&P II with Medical Terminology (60 hrs)*
- c. *MA:801 Externship (160 hrs)*

As you can see, even if you do not include the externship, our students must learn 65.9% of the total Medical Assistant Program in order to pass the AMT Phlebotomy Exam.

We are looking to resolve these issues as quickly as possible so that we may continue to support our students in finding them employment that meets their career aspirations and the criteria set forth by ACICS. Thank you in advance for your time, we look forward to your response.

Sincerely,

Chuck Copt

Chuck Copt

Director of Education & Evening School Director



Hunter Business School

Brookhaven Executive Center
3247 Route 112 B dg. 3
Medford, NY 11763
(631) 736 7360 Ext. 116
www.hunterbusinessschool.edu



From: Perliter Walters-Gilliam
To: jnyx@hunterbusnessschool.edu
Cc: [Robert W. Williams](mailto:Robert.Williams@hunterbusnessschool.edu); [Latoya Boyd](mailto:Latoya.Boyd@hunterbusnessschool.edu); [Kerly Zeiger](mailto:Kerly.Zeiger@hunterbusnessschool.edu); [Connie Barker](mailto:Connie.Barker@hunterbusnessschool.edu)
Subject: PVP Submission Concerns
Date: Friday, January 13, 2017 9:55:00 AM
Importance: High

Dear Ms. Nyx:

Latoya shared your email below for my review and follow up concerning placements deemed invalid for Medical Assistants graduates in Phlebotomists positions. Consistent with guidance previously provided, this is considered to be invalid and all previously accepted submissions will be revised. The rationale is as follows:

Phlebotomy is one skill learned as part of the larger set of skills obtained from the program. Per our requirement, there must be predominant use of skills from the program in the position to make it a valid placement. According to the program outline on page 14 of the 2016/2017 catalog, Phlebotomy is covered in two courses along with Laboratory Procedures (120 hours). This is 120 hours in a 910-hour program (13%).

I have also reviewed the general office placements for graduates from the Medical Office Administration program. While a predominant number of courses in the program (11/16 = 68.75%) are focused on general office, thereby justifying these classifications, the reference to "business environments" in the position description is inappropriate given that the CIP code description of the Medical Office Administration (51.0710) reads as follows:

A program that prepares individuals, under the supervision of office managers and other professionals, to perform routine administrative duties in a medical, clinical, or health care facility/system office environment. Includes instruction in general office skills, data processing, office equipment operation, principles of medical record-keeping and business regulations, medical/clinical office procedures, and communications skills. A program that prepares individuals, under the supervision of office managers and other professionals, to perform routine administrative duties in a medical, clinical, or health care facility/system office environment. Includes instruction in general office skills, data processing, office equipment operation, principles of medical record-keeping and business regulations, medical/clinical office procedures, and communications skills.

(<https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=55&cip=51.0710>)

Hence, the institution is advised that the program description, in its catalog, web site, and any other publication must be revised to no longer make reference to the business environment, or it should revise the program description along with the CIP Code designation accordingly. I note that the institution recently hosted the onsite evaluation team which had serious concerns in this regard, with serious resistance by the campus. Hence, the institution is advised that it may respond to this assessment as part of its response to the Council's deferred Renewal of Accreditation action for the Council's consideration at its April 2017 meeting.

Please advise if the changes will be made or if the institution will respond to Council in appeal.

Ms. Perliter Walters-Gilliam
Vice President - Accreditation
Accrediting Council for Independent Colleges and Schools
750 First Street, NE Suite 980 Washington, DC 20002
www.acics.org 202.336.6769 - p

CONFIDENTIAL NOTICE:

This communication is only intended for the persons or entities to which it is addressed or copied and may contain information that is confidential and or privileged in some way. Distribution or copying of this communication or the information contained herein is not expressly authorized. ACICS reserves the right to disclose this communication as required by law without the consent of the persons or entities to which this communication is addressed.

From: Jennifer Nyx <jnyx@hunterbusnessschool.edu>
Sent: Thursday, January 12, 2017 4:26:59 PM
To: LaToya Boyd
Subject: RE: Hello LaToya

Hello LaToya~

I do have a few questions.

As you can see below, we have a few placements that are stated as invalid.

4 of them are phlebotomists – which is not an accepted title but the skill sets are in alignment with the placement. ACICS is stating that it is invalid. In the past, when I have submitted Phlebotomists as placements, it has been accepted, except for these last 4 from this past month.

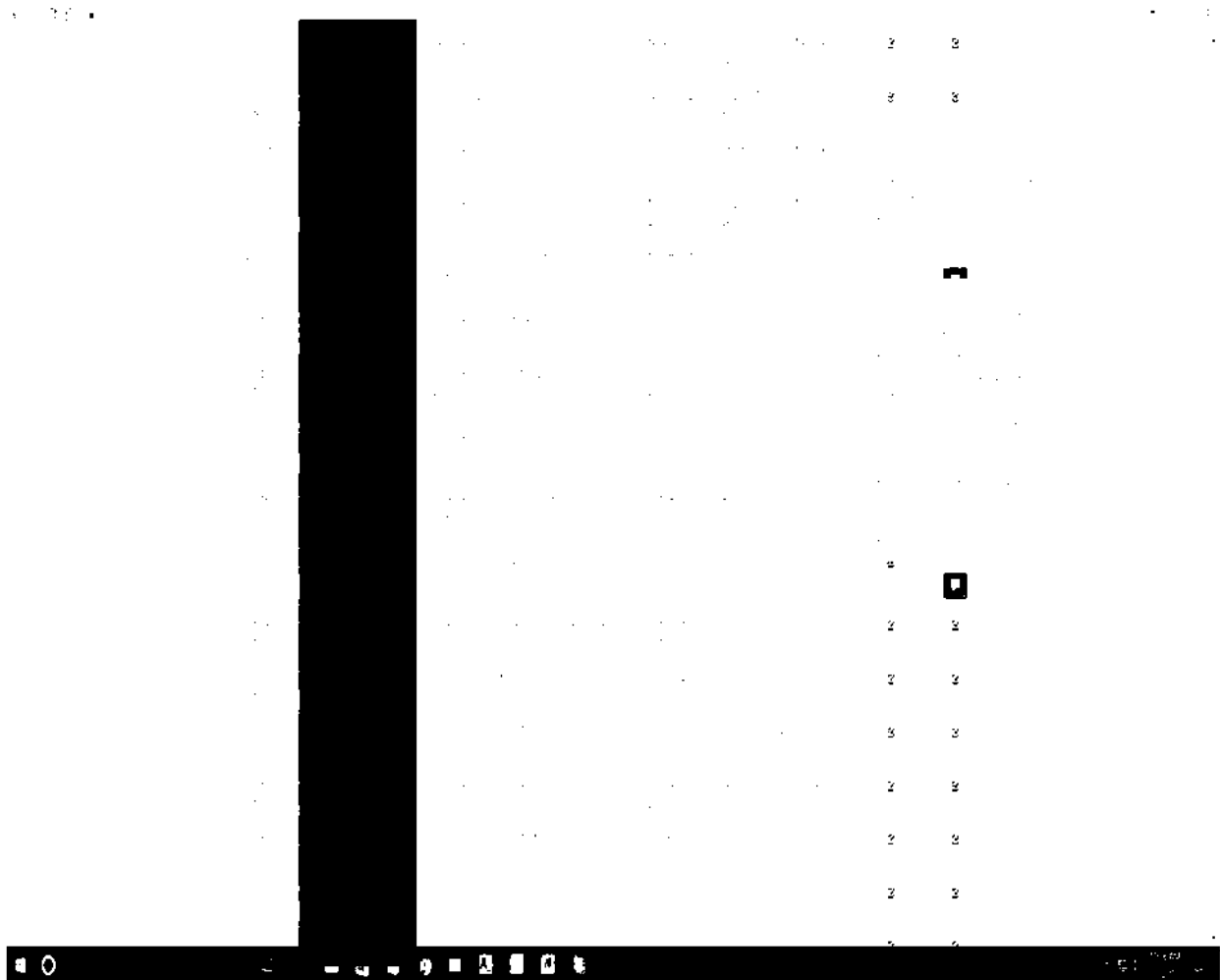
The other placement, [REDACTED] is a Medical Office Administration graduate. Her skill set is also in alignment with the placement. Please see listed on our website:

The Medical Office Administration program prepares students with the skills necessary to provide excellent administrative support while working and playing a key role in running an efficient, productive office in a variety of medical and business environments.

<http://www.hunterbusinessschool.edu/programs/long-island-medical-office-administration-program/>

We have had a few Medical Office Administration graduates who take jobs in a business environment, like [REDACTED]

Please let me know what the next steps are to get this rectified. Thank you. ☺



Jennifer A. Sipe
Director Of Career Services
Hunter Business School

3247 Route 112, Building 3
Medford, NY 11763
631-569-7707 - Tel
631-736-7310 - Fax



From: LaToya Boyd [mailto:LBoyd@acics.org]
Sent: Thursday, January 12, 2017 8:05 AM
To: Jennifer Nyx
Subject: RE: Hello LaToya

Hello Jennifer and happy New Year to you too!

What type of question do you have? Is it an "I" question or is it about your placement verification?

Regards,

LaToya Boyd, MNML
Accreditation Coordinator
Accrediting Council for Independent Colleges and Schools
750 First Street, N.W. Suite 980 - Washington, DC 20002
www.acics.org 202.336.6777 - p

From: Jennifer Nyx [mailto:jnyx@hunterbusinessschool.edu]
Sent: Wednesday, January 11, 2017 6:57 PM
To: LaToya Boyd
Subject: Hello LaToya

Hello LaToya~

Happy New Year!
I was hoping that you could steer me in the right direction.
Who would I contact about the PVP as I have a few questions.
Thank you. ☺

Director Of Career Services

Hunter Business School

3247 Route 112, Building 3
Medford, NY 11763
631-569-7707 - Tel
631-736-7310 - Fax



Appendix F: Email Communication to Campuses on PVP/CAR Errors

From: Steven Gelfand <sgelfand@acics.org>

Date: torsdag den 8. marts 2018 kl. 15:50

Til: Claus Villumsen <c.villumsen@acics.org>

Emne: Errors in your 2018 CAR

Good Morning Claus

In reviewing the 2018 Q1 CAR data we found the following errors.

The following student was shown as placed on the CAR, but not completing the program

00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
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The following students were shown as graduating or completing the program but there is no placement information

00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]
00171290	Niels Brock Copenhagen Business College	28744	Post-Secondary Business Vocational And Educational Training	Certificate/Diploma	[REDACTED]

High Level Overview of PVP Supplement to PVP Report

PVP Excel Template

Microcode/Competency Data	Candidate Information							Program Information			Employment Status	Placement (Select only 1 of the 3 types of placement)			Employee Information							
												<u>EMPLOYED</u> Employee is currently employed with the organization and is currently performing the job for which the program is being completed.	<u>PLACEMENT</u> Employee is currently employed with the organization and is currently performing the job for which the program is being completed.	<u>UNEMPLOYED</u> Employee is currently unemployed and is seeking employment with the organization.								
AP/BS/BA	Candidate First Name	Candidate Last Name	Candidate ID Number (6 Digits)	Candidate Address (Street and City)	Phone Number	Email Address	Personal Email Address (Mandatory)	Program Name	Alt Code	Academy	Current Title	Alt Code	Alt Title	Shift	Workstation and Learning Center	State	Location	Contract ID	Start of Contract Period	End of Contract Period	End of Contract Term	



PVP Submission Page



ACICS Placement Verification

00010001 LOG OFF

1. If you need a copy of the PVP template, please download it here.

[Download PVP Template](#)

2. Prepare your Excel file with your placement activity, if you have no placements this month please check the box below.

No Placements March, 2012

3. Select your language and upload your monthly placements below. Please note graduates and employers will be automatically be contacted via email upon upload.

Language	Select File
English	<input type="text" value="Browse"/>
Spanish	
Chinese	
Japanese	
Arabic	
Dutch	
Vietnamese	

Employment Verification Status



Email Communications



The Accrediting Council for Independent Colleges and Schools (ACICS), the accrediting agency of **ACICS Test Org**, from where you graduated in **02/18** or completed coursework in **test program**, needs to confirm that the credential or training has been beneficial to you in maintaining or advancing in your current position due to the following:

[Make a Correction](#)

[Request a Phone Call](#)

If you have any issues with the links above please respond to this message with your answer.



The Accrediting Council for Independent Colleges and Schools (ACICS), the accrediting agency of **ACICS Test Org** is sending this communication in an effort to verify that graduates are provided with career opportunities that utilize the skills obtained from their training. Therefore, we ask that you confirm that the credential or training received by **John Smith** with a **test program** who is working or has previously worked as **tester** aided the graduate in maintaining or advancing their career with your company.

[Make a Correction](#)

[Request a Phone Call](#)

If you have any issues with the links above please respond to this message with your answer.

Email Communications



The Accrediting Council for Independent Colleges and Schools (ACICS), the accrediting agency of **ACICS Test Org**, from where you graduated in **02/18** or completed coursework in **test program**, needs to confirm that you are using or have used the knowledge and skills learned from the program as a predominant component of your current position or position previously held, as reported by the institution: **tester at John**.

Skills Used: testing

Make a Correction

Request a Phone Call

If you have any issues with the links above please respond to this message with your answer.



The Accrediting Council for Independent Colleges and Schools (ACICS), the accrediting agency of **ACICS Test Org** in its efforts to verify that graduates are provided with career opportunities that utilize the skills obtained from their training, needs to confirm: **John Smith**, with a **test program**, is currently working or has previously worked as **tester** at your company, using the following skills listed as a predominant component of the job

Skills Used: testing

Make a Correction

Request a Phone Call

If you have any issues with the links above please respond to this message with your answer.

Email Communication



The Accrediting Council for Independent Colleges and Schools (ACICS), the accrediting agency of **ACICS Test Org**, from where you graduated in **02/18** or completed coursework in **test program**, needs to confirm that you are, or have been previously, employed in the following position, as reported by the institution: **tester** at **John**

[Make a Correction](#)

[Request a Phone Call](#)

If you have any issues with the links above please respond to this message with your answer.



The Accrediting Council for Independent Colleges and Schools (ACICS), the accrediting agency of **ACICS Test Org** in its efforts to verify that graduates are provided with career opportunities that utilize the skills obtained from their training, needs to confirm that **John Smith** is or has been previously employed as **tester** at your company.

[Make a Correction](#)

[Request a Phone Call](#)

If you have any issues with the links above please respond to this message with your answer.



Campus Management View of PVP Data

EXPORT PLACEMENTS

Submitted For	Graduate Name	Graduate ID	Date Submitted	Employer Name	Placement Date	Program Name	Graduate/Employer Verified	ACICS Verified	Date Reviewed	Contest Results	Remove
March 2016	John Fets	939483 CHANGE	April 4 2016	XYZ Co	January 18 2016	Test Program					X
December 2017	Bob Bulber	32132 CHANGE	January 31 2018	Bulber Inc	January 12 2018	Building		✘ Invalid		CONTEST RESULTS	X
November 2017	John Fets	1234577 CHANGE	January 22 2018	Jim Jones	October 18 2017	Test		✔ Verified	February 27th 2018		🔒
November 2017	John Fets	9394929 CHANGE	November 16 2017	Upload Tests	December 1 2016	Test Program		✘ Invalid		Denied	X
November 2017	John Fets	1334929 CHANGE	November 13 2017	Test Name	November 1 2017	Test Program					X
November 2017	Tester	99999 CHANGE	January 21 2018	Sesame	December 19 2017	Learning		✘ Invalid	December 8th 2017	Timeframe has exceeded 30 days from ACICS review and can no longer be contested	X
September 2017	Retesting Simultaneous	456 CHANGE	October 23 2017	Boss	October 20 2017	Sesame					X
September 2017	K Ziggs	123456 CHANGE	October 6 2017	Weavers INC	May 20 2017	Underwater Basket Weaving		✔ Verified	October 18th 2017	Approved	🔒
June 2017	Duton Ian	434343 CHANGE	June 2 2017	The man	June 1 2017	Duton	✔	✘ Invalid	January 22nd 2018	Timeframe has exceeded 30 days from ACICS review and can no longer be contested	X



Campus Management View of PVP Data

June 2017	Dutchman	434343 CHANGE	June 2 2017	The man	June 1 2017	Dutchman
May 2017	Dutchman	387654 CHANGE	June 6 2017	The man	June 1 2017	Dutchman

The graduate noted that this placement is incorrect. Please review and revise accordingly or resubmit with documentation clarifying the placement of this graduate.



Timeframe has exceeded 30 days from ACICS review and can no longer be contested



CONTEST RESULTS



Campus Management View of PVP Data

December 2017 Bob Builder 32132 CHANGE January 30, 2018 Bob Builder January 12, 2018 Building **✖ Invalid**



Contest Result

If a placement has been deemed invalid by ACICS, the institution may contest the decision by submitting supporting documentation to the PVP review panel. The panel will complete a contest review, and their decision will be final. Documentation should include the following:

Title classification: evidence that the title identified is aligned with the program of study and may be unique to a field, employer, etc.

For a placement by skills: written evidence to demonstrate that the graduate is utilizing a predominant number (majority) of skills they obtained from their program on a regular basis in the position. Documentation should consist of program description/course listings, and a position description from the employer or attestation(s) from the graduate and/or employer identifying the skills utilized in the position.

For a placement by benefit: written evidence that the graduate received a promotion, pay raise, or that the completion of the program enabled them to keep their current position. Documentation should include an attestation written by the employer/student identifying the benefit gained, comparative pay stubs which shows an increase, change in employment status or position (from non-ordinator to supervisor, etc.).

**Note: Submissions are only for placements that have been verified but marked invalid. Questions regarding placements that have not been verified should be submitted to the institution's advisor.*

Notes to PVP Review Panel:

Attach up to 3 files:

File 1:  **BROWSE**

File 2:  **BROWSE**

File 3:  **BROWSE**

SUBMIT DATA **CLOSE**

Administrator Dashboard

ACICS

begin typing to search

- User Access
- Monthly Placements
- Upcoming Visits Placements
- Archived Placements
- Contested Placements 127
- Need Assistance 1
- Response Que
- Call Requests 4
- Reports
- Active Institutions
- Fraud Check
- Update Excel Template

ACICS

begin typing to search

- User Access
- Monthly Placements
- Upcoming Visits Placements
- Archived Placements
- Contested Placements 127
- Need Assistance 1
- Response Que
- Call Requests 4
- Reports
- Active Institutions
- Fraud Check
- Update Excel Template

Monthly Placements

ACICS

begin typing to search

- User Access
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- Upcoming Visits Placements
- Archived Placements
- Contested Placements 127
- Need Assistance 1
- Response Que
- Call Requests 4
- Reports
- Active Institutions
- Fraud Check
- Update Excel Template



Placement Month: May 2016 ▼

Institution Name:

Filter:

Archive Export

Search:

ACICS ID	Institution
00040607	Eastern Technical College
00040627	Delaware University
00040610	Florida College of Technology
00040619	Lehigh Valley College
00040679	Lehigh Valley College of Culinary Arts
00040680	Lehigh Valley College of Culinary Arts
00040682	Lehigh Valley College of Culinary Arts
00040684	Lehigh Valley College of Culinary Arts
00040686	Lehigh Valley College of Culinary Arts
00040688	Lehigh Valley College of Culinary Arts
00040690	Lehigh Valley College of Culinary Arts
00040692	Lehigh Valley College of Culinary Arts
00040694	Lehigh Valley College of Culinary Arts
00040696	Lehigh Valley College of Culinary Arts

Institution	Date Uploaded	Number of Placements	Email Responded		ACICS Verified		Response Rate	% Verified	View
			Graduate	Employer	Contact	Email			
	May 4, 2016	No Placements							
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	May 8, 2016	No Placements							
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	
	Not Submitted Yet	0	0	0	0	0	0%	0%	



Placement Review and Validation

All Placements for 00010001

Search

PLACEMENT PERIOD	GRADUATE			DATE		EMPLOYER					PLACEMENT					VERIFICATION					VIEW	REMOVE	
	Name (ID) ↓	Phone	Email	Submitted	Cohort	Name	Contact	Phone	Email	URL	Placement Date	Program Name	Placement Title	Placement Category	Credential	Graduate Call Count	Employer Call Count	Student	Employer	ACICS			
December 2017	Bob Eulder 10111 change id		✉	January 01, 2017	2017	Eulder, Bob	John		✉	🌐	January 01, 2017	Building	Eulder, Bob	SE	Associate's	0	0				🗨️	✖️	
June 2017	Dutch, Jan 494749 change id	994-749-999	✉	June 21, 2017	2017	The man			✉	🌐	June 12, 2017	Dutch	the man	TE	2	0					🗨️	✖️	
May 2017	Dutch, Jan 997-54 change id	994-749-999	✉	June 8, 2017	2017	The man			✉	🌐	June 12, 2017	Dutch	the man	SE	2	0					🗨️	✖️	
November 2017	John Feltz 1034779 change id	601-600-1118	✉	January 22, 2018	2018	Feltz, John	Verny Jones	110-600-1118	✉	🌐	October 22, 2017	Test	Teacher	SE	Master's	0	0					✖️	
November 2017	John Feltz 1834709 change id	111-111-1111	✉	November 08, 2017	2017	Feltz, John	Test Person	111-111-1111	✉	🌐	November 2, 2017	Test Person	Test Title	TE	None	0	0					✖️	
May 2017	John Feltz 5555 change id	111-111-1111	✉	June 21, 2017	2017	Feltz, John	John	111-111-1111	✉	🌐	December 2, 2017	Exam Test	Test Person	SE	Test	0	0					✖️	
March 2017	John Feltz 1334739 change id	111-111-1118	✉	April 3, 2017	2017	Feltz, John	John	111-111-1118	✉	🌐	January 1, 2018	Test Person	Test Person	TE	Master's in Teaching	0	0					✖️	
November 2017	John Feltz 9334709 change id	111-111-1118	✉	November 06, 2017	2017	Feltz, John	John	111-111-1118	✉	🌐	December 2, 2017	Test Person	Test Person	TE	Associate's	0	0					🗨️	✖️
March 2017	John Feltz Feltz, 10001 change id	601-600-1118	✉	April 17, 2017	2017	Feltz, John	John	601-600-1118	✉	🌐	April 17, 2017	Test Person	Test Person	TE	High School Youth Librarian	0	0						✖️



ACICS COMMENTS AND FILES

ADD NEW COMMENT

START TO END

FILE UPLOAD

Upload

INFORMATION SUBMITTED

DATE	TIME
04/27/2012	11:31
Student info	
Student	12345
Program	PROGRAM
Course	12345678
Employer	
Employer	12345678
Address	12345678
City	12345678
State	12345678
Zip	12345678
Phone	12345678
Website	12345678
Employer	12345678

CORRECTION

Placement:

Placement	12345678
Employer	12345678
Address	12345678
City	12345678
State	12345678
Zip	12345678
Phone	12345678
Website	12345678
Employer	12345678
Address	12345678
City	12345678
State	12345678
Zip	12345678
Phone	12345678
Website	12345678
Employer	12345678

Placement Review

Unable to Verify **Mark Invalid**

Contested Placements Review



PLACEMENT PERIOD	GRADUATE			DATE	EMPLOYER					PLACEMENT					VERIFICATION			VIEW	CONTESTED
	Name (ID)	Phone	Email		Submitted	Name	Contact	Phone	Email	URL	Placement Date	Program Name	Placement Title	Placement Category	Credentialed	Student	Employer		
Apr 2016	Janeiro Brito 4497007	727-2077324	✉	Apr 24 2016	Pericon Diagnosis	essaia Rales	813-222-0421 en500	✉	✓	February 2017	Medical Assisting	Scout24Tech	Dr	Diocese			✉		
Mar 2017	Therese 4497074	305-489-0947	✉	Apr 08 2017	Amelia DeMatteo	Maria Lore	305-340-8818	✉	✓	March 6 2017	Medical Assistant	Medical Assistant	The	Diocese			✉		
Mar 2016	Tyler 4497081	341-642-0101	✉	Apr 27 2016	11200 Per Center Hospital	Heather Carpenter	341-710-1817	✉	✓	March 2016	Medical Assistant	Pericon Diagnosis	Dr	Diocese			✉		
Mar 2016	Vanessa 4497090	784-410-0474	✉	Apr 07 2016	Trinidad Diaz	Leandro Diaz	407-224-0100	✉	✓	Jan 14 2016	Self-Direct Operations and Management	Customer Assistant	The	Associate			✉		
Mar 2016	Joseph 4497091	407-354-3434	✉	Apr 07 2016	Phyllis Diaz	Raymond Diaz	407-354-3434	✉	✓	March 22 2016	Self-Direct Operations and Management	Diaz	The	Associate			✉		
Mar 2016	Erin 4497092	305-203-0117	✉	Apr 01 2016	Trish Diaz	Gerardo Diaz	305-203-0117	✉	✓	Jan 14 2016	Master of Business Administration	System Administrator	The	Master's Degree			✉		
December 2016	William 4497093	305-439-7103	✉	December 21 2016	Jose Ramos	Ramon Ramos	305-249-6601	✉	✓	November 27 2016	Self-Direct Operations and Management	Self-Direct Assistant	The				✉		
Apr 2017	Angela 4497094	305-328-4108	✉	Apr 01 2017	Rafael Diaz	Yolanda Diaz	305-328-4108	✉	✓	Apr 08 2017	Parent Care Technician	Parent Care Technician	Dr	Diocese			✉		
Apr 2016	William 4497095	874-078-0370	✉	Mar 3 2016	Theresa Hess	Harold Hess	874-808-0310	✉	✓	Apr 19 2016	ASD Degree Self Management	Self-Direct Assistant	Dr	Associate Degree			✉		
Apr 2016	Vanessa 4497096	214-617-1471	✉	Mar 3 2016	Amelia Diaz	Theresa Diaz	214-617-1471	✉	✓	March 2016	Medical Assistant	Self-Direct	The	Diocese			✉		
March 2016	Bergel 4497097	813-210-8038	✉	March 21 2016	Edgar Diaz	Theresa Diaz	813-210-8038	✉	✓	February 1 2016	Health Administrative Technician	Warehouse Associate	The	Diocese			✉		



Fraud Checking



Placement Date	ACICS ID	Upload IP	Graduate IP	Graduate Name (ID)	Employer IP	Employer Name
Apr 10, 2016	00001491	714034226		Daniel Reuter (1610014091)	1043316101	Perkins Elve
Apr 18, 2016	00011491	714034226	187.190.216.49 warning	Adnan Brass/Monica (1610379304)	187.190.216.49 warning	Don Pacific TV
Apr 10, 2016	00011491	714034226	714154226 warning	Hjara Nathan (1602453227)		Dave Sinto
Apr 16, 2016	00011491	714034226	184.93.97.250	Ridambharant, Divyansu/John		Grand Priemore
Apr 18, 2016	00011491	714034226	407.140.44	D'Angelo, Matthew (1611445407)	149.225.34.41	Mining Future Company
Apr 10, 2016	00071541	0000712940	117.77.251.12	Darius Durr (1691005)		North Florida Legal Associates
Apr 18, 2016	00012794	10040034188	7103369242	Darcy Fournier (1170389)		Dr Solomon's Office
Apr 18, 2016	00012794	10040034188	7104748106	Sayantika Singh (7494804)		Dr. Kiana Tolson/Office
Apr 16, 2016	00012794	10040034188	172.56.20.226	Kevin Liu/Rey (1794054)		AAJPA Records
Apr 17, 2016	00012408	708497102	66.87.219.47	Roderick Bruce (0000283470)		Appelbees
Apr 17, 2016	00012408	98101034	71076211207	Shirley Jones (164105)	170.90.100.254	Therapeutic Orthopedic & Sports Medicine
Apr 17, 2016	00019410	24148144101	174.104.81.25	Jane M. Puccio/John	194.115.40.41	US Security
Apr 17, 2016	00019410	24148144101		Joseph Hayward (0000244870)	194.115.40	SAIC
Apr 17, 2016	00019410	24148144101	69.20.40.1	Tanya Hayes (000004137)		USGAIL
Apr 17, 2016	00019410	24148144101	174.104.81.63	Nicholas Cowan (000041604)		US Government
Apr 17, 2016	00019410	24148144101	67.17.119.77	Kaylene/Max (0000101)		USG Transitions
Apr 17, 2016	00019410	24148144101	172.56.13.20.1	Alexandra/Lindsey/John	64.160.100.14	El Centro Dental
Apr 17, 2016	00019410	24148144101		Jamie O'Peck (00010372)	74.127.171.34	Jamie O's Reflection of Reflection
Apr 17, 2016	00019410	24148144101		Josephine Morris (0000247)		Equi-Lite D-Throat Centre
Apr 17, 2016	00019410	24148144101	98.206.194.75	Shirley Jackson (4404020)		Sam's Tech Solutions
Apr 17, 2016	00019410	24148144101		Alexis/Sean (00000443)		Agape Care Farm
Apr 17, 2016	00019410	24148144101	99.200.225.104	Karen/LeDevi (160279205)	99.240.100.100	Northwest Louisiana Health Care



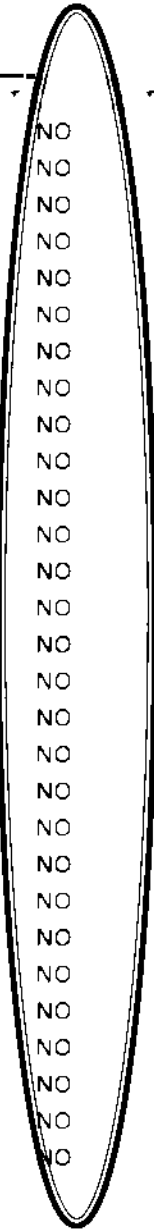
Managing the PVP - Reports

- ▬ Reports
 - ▬ ACICS Reviewer Activity
 - ▬ ACICS Verification
 - ▬ ACICS Totals
 - ▬ Institution Submission History
 - ▬ Contested Placements Report
 - ▬ Company Call List
 - ▬ Corrections Report
 - ▬ Contradictions Report
 - ▬ Comments Report
 - ▬ Invalid Student ID Report
 - ▬ Last Upload Report

Linking PVP data with CAR data

Comparing Placements Reported on the CAR to PVP

30879	00010408	Trinity College of Puerto Rico		Nursing	51.3801	NO
8920	00010408	Trinity College of Puerto Rico		Technical Practical Nurse	51.3901	NO
8729	00010487	South Coast College		Paralegal Studies	22.0302	NO
8729	00010487	South Coast College		Paralegal Studies	22.0302	NO
8737	00010487	South Coast College		Medical Assistant	51.0801	NO
8728	00010487	South Coast College		Legal Administrative Assistant	22.0301	NO
8737	00010487	South Coast College		Medical Assistant	51.0801	NO
8737	00010487	South Coast College		Medical Assistant	51.0801	NO
22569	00010582	Virginia College		Medical Assistant	51.0801	NO
7105	00011105	National Latino Education Institute		BMA	51.0801	NO
7105	00011105	National Latino Education Institute		BMA	51.0801	NO
6734	00011162	Instituto de Banca y Comercio		Advanced Hairstyling and Design	12.0407	NO
6734	00011162	Instituto de Banca y Comercio		Advanced Hairstyling and Design	12.0407	NO
6734	00011162	Instituto de Banca y Comercio		Advanced Hairstyling and Design	12.0407	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		MOS	31.9092	NO
2714	00012511	Manhattan School of Computer Technology		MOS 1500	51.071	NO
2714	00012511	Manhattan School of Computer Technology		MOS	31.9092	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		MOS	31.9092	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	NO



Comparing Placements Reported on the CAR to PVP

9634	00010101	Everest University - Brandon		Business AS	52.9999	YES
30879	00010408	Trinity College of Puerto Rico		Nursing	51.3801	YES
30879	00010408	Trinity College of Puerto Rico		Nursing	51.3801	YES
8737	00010487	South Coast College		Medical Assistant	51.0801	YES
6331	00010934	Fortis Institute		Heating, Ventilation, Air Conditioning and Refrigeration	47.0201	YES
3789	00011194	McCann School of Business & Technology		Criminal Justice	43.0199	YES
2714	00012511	Manhattan School of Computer Technology		Medical Office Specialist	51.0801	YES
2714	00012511	Manhattan School of Computer Technology		MOS	31.9092	YES
19269	00012797	Golf Academy of America		Golf Complex Operations and Management	31.0302	YES
4692	00015747	Ridley-Lowell Business & Technical Institute		Medical Assistant	51.071	YES
4692	00015747	Ridley-Lowell Business & Technical Institute		Medical Assistant	51.071	YES
20109	00015747	Ridley-Lowell Business & Technical Institute		HVAC Installation Technician	15.0501	YES
4692	00015747	Ridley-Lowell Business & Technical Institute		Medical Assistant	51.0801	YES
16778	00015747	Ridley-Lowell Business & Technical Institute		Cosmetology	12.0401	YES
16778	00015747	Ridley-Lowell Business & Technical Institute		Cosmetology	12.0401	YES
16778	00015747	Ridley-Lowell Business & Technical Institute		Cosmetology	12.0401	YES
20109	00015747	Ridley-Lowell Business & Technical Institute		HVAC Installation Technician	15.0501	YES
16778	00015747	Ridley-Lowell Business & Technical Institute		Cosmetology	12.0401	YES
24378	00015747	Ridley-Lowell Business & Technical Institute		Electrical Systems Technician	46.0302	YES
24378	00015747	Ridley-Lowell Business & Technical Institute		Electrical Systems Technician	46.0302	YES
16952	00015747	Ridley-Lowell Business & Technical Institute		Esthetics	12.0409	YES
24378	00015747	Ridley-Lowell Business & Technical Institute		Electrical Systems Technician	46.0302	YES
4692	00015747	Ridley-Lowell Business & Technical Institute		Medical Assistant	51.071	YES
20109	00015747	Ridley-Lowell Business & Technical Institute		HVAC Installation Technician	15.0501	YES
16778	00015747	Ridley-Lowell Business & Technical Institute		Cosmetology	12.0401	YES
16778	00015747	Ridley-Lowell Business & Technical Institute		Cosmetology	12.0401	YES
5326	00023927	Fortis Institute		Medical Assisting	51.0710	YES
5326	00023927	Fortis Institute		Medical Assisting	51.0801	YES
16644	00023927	Fortis Institute		Medical Laboratory Technology	51.1004	YES
5326	00023927	Fortis Institute		Medical Assisting	51.0710	YES

Case Name: *In the Matter of Accrediting Council for Independent Colleges and Schools*

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit A-O-3

ACICS Accreditation Criteria

Publication Date: May 10, 2018

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

750 First Street, N.E. • Suite 980 • Washington, DC 20002-4223

202.336.6780 – telephone • 202.842.2593 – facsimile • www.acics.org

Accreditation Criteria Policies, Procedures, and Standards

Accrediting Council for Independent Colleges and Schools

750 First Street, N.E.
Suite 980
Washington, DC 20002-4223
(202) 336-6780 (telephone)
(202) 842-2593 (facsimile)
acics@acics.org
www.acics.org

Publication Date: May 10, 2018

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INTRODUCTION

The Accrediting Council for Independent Colleges and Schools (“ACICS” or “Council”) supports the concept that periodic evaluation entered into voluntarily by institutions and their peers enhances the quality of the educational process and demonstrates that self-regulation of a profession is superior to outside regulation. This has been the philosophy of ACICS since 1912 when the first association of business schools was formed.

ACICS is incorporated as a non-profit education organization in the Commonwealth of Virginia and maintains offices in the District of Columbia. It has been recognized by the Council of Higher Education Accreditation (CHEA) since 2001. CHEA is an association of degree-granting colleges and universities and recognizes institutional and programmatic accrediting organizations; and it serves as a primary national voice for accreditation in the U.S. and as a representative of the U.S. accreditation community to international audiences.

To help institutions and peer evaluators meet their responsibilities in conducting the process, ACICS developed and periodically has revised a set of policies, procedures, and standards governing the activity. Collectively, they comprise the *Accreditation Criteria* which, when complied with by institutions, results in the awarding of accreditation. This document incorporates all changes agreed to by the institutions since the last published edition, as well as organizational modifications.

Embodied in these criteria is the belief by ACICS that accredited institutions should at all times demonstrate a high standard of professional conduct involving educational practices and business ethics. Accreditation is not a regulatory process in the legal sense. The Council encourages not just conformity to standards but a continuous striving for excellence. Only those institutions that believe in this tenet should seek accreditation.

TITLE I GENERAL POLICIES

Chapter 1 An Overview of the Council

STATEMENT OF MISSION

The mission of the Accrediting Council for Independent Colleges and Schools is to advance educational excellence at independent, nonpublic career schools, colleges, and organizations in the United States and abroad. This is achieved through a deliberate and thorough accrediting process of quality assurance and enhancement as well as ethical business and educational practices.

DEFINITION OF ACCREDITATION

Accreditation is an independent appraisal of an institution during which the institution's overall educational quality (including outcomes), professional status among similar institutions, financial stability, and operational ethics are self-evaluated and judged by peers. It is a voluntary activity separate and distinct from business licensing, authority to award educational credentials, and eligibility to administer student financial assistance.

DEFINITION OF ACADEMIC QUALITY

ACICS defines academic quality as the overall performance of the institution in the context of its mission and as measured by the extent to which the institution achieves its intended student learning and student success outcomes.

Student learning outcomes involve assessment of skill and competency attainment. Student success outcomes include student retention or persistence; employment or placement; and student, graduate and employer satisfaction.

The effectiveness of the institution is demonstrated by its compliance with accreditation standards as well as its continuous striving for enhancement of quality. ACICS assesses academic quality in the following areas: mission and objectives; campus effectiveness planning; student outcomes; financial stability; recruitment and admission practices; organizational structure and administration; student services; academic program and curriculum; quality of faculty and instruction; physical facilities; library and learning resources; and publication and disclosure of student achievement.

1-1-100 – BYLAWS

The Bylaws of the Accrediting Council for Independent Colleges and Schools (“ACICS” or “the Council”) are an integral part of the *Accreditation Criteria* and are incorporated herein by reference. The Bylaws are contained in Appendix A.

1-1-200 – RECOGNITION

ACICS is a national institutional accrediting agency that is a reliable authority regarding the quality of education and training provided by the institutions that it accredits. It has been recognized by the Council on Higher Education Accreditation (CHEA) since 2001. Any proposed change in the policies, procedures, or accreditation criteria that might alter ACICS's scope of recognition or ACICS's compliance with the requirements for recognition will be submitted to the membership and other appropriate agencies.

The Council adopts the following statements regarding ACICS and the manner in which it carries out its accreditation function:

- (a) The Council grants accreditation for an established period of time, as described more fully in these

criteria. Prior to the expiration of the grant of accreditation, each institution must seek a renewal of accreditation. The Council maintains complete and accurate records for each accredited institution that cover the current and the prior periods of accreditation.

- (b) The Council conducts ongoing and comprehensive reviews of its accreditation criteria and its policies and procedures to ascertain their appropriateness and effectiveness. Proposed changes to the criteria or the Council's policies and procedures may be initiated by the Council or submitted by member institutions or other interested parties, and substantive proposed changes approved by the Council will be circulated to member institutions, appropriate governmental agencies, and other interested parties for comment. The Council will consider all comments before it adopts any final changes.

1-1-300 – PUBLIC PARTICIPATION

Visitors to Council policy meetings will be seated as space permits. They should notify the President or the Chair of the Council in advance if they wish to address specific agenda items. Individuals may request that items be placed on the agenda by writing to the President at least 45 days before each meeting.

Chapter 2 Eligibility Criteria

INTRODUCTION

The Council fulfills an evaluative and accrediting function for a particular sector of postsecondary education. This function has been deemed appropriate by the U.S. Department of Education and by the Council for Higher Education Accreditation (CHEA) through the recognition of ACICS.

The mission of the Accrediting Council for Independent Colleges and Schools is to advance educational excellence at independent, nonpublic career schools, colleges, and organizations in the United States and abroad. This is achieved through a deliberate and thorough accreditation process of quality assurance and enhancement as well as ethical business and educational practices.

1-2-100 – MINIMUM ELIGIBILITY REQUIREMENTS

To be eligible for consideration for accreditation, an institution or entity must satisfy the following minimum requirements.

- (a) It shall be either an institution of postsecondary education (as herein defined) primarily offering certificates or diplomas and postsecondary institutions offering associate's, bachelor's, or master's degrees in programs designed to educate students for professional, technical, or occupational careers; or a noninstitutional entity offering professional enhancement education.

An institution is presumed to be an institution of postsecondary education if it (1) enrolls a majority of its students in one or more programs, the content of which is on a postsecondary academic level and which leads to a postsecondary academic credential (such as a certificate, diploma, or degree) or an occupational objective; (2) enrolls students who possess a high school diploma or its equivalent, or who are beyond the age of compulsory school attendance and demonstrate through valid assessment an ability to benefit from the educational experience; and (3) offers at least one program which is a minimum of 300 clock hours in length.

A noninstitutional entity must enroll a majority of its students in one or more programs, the content of which is on the postsecondary level or at a level which prepares the student for immediate enrollment into a postsecondary program. A noninstitutional entity is ineligible to participate in federal student aid programs or to award degrees.

- (b) It shall be legally organized; licensed by (1) the appropriate state education agency for postsecondary institutions or (2) the appropriate state agency for authorizing the conduct of business in that state for noninstitutional entities; and have offered its educational services to the general public for at least two years immediately prior to consideration of the application by ACICS.
- (c) Its mission shall be to offer educational programs which help students develop skills and competencies to enhance their careers.
- (d) Its residential enrollment and enrollment in each program shall be sufficient both to support coursework and learning experiences that, separately or in combination, constitute measurable and defined educational programs, and to enable ACICS to assess the educational effectiveness of those programs.

Institutions that are considered distance education institutions may be considered on a case-by-case basis provided they require a residential component.

- (e) It shall have a sufficient number of graduates from a majority of its programs to enable ACICS to assess the educational effectiveness of those programs. Programs offered at any credential level from which

there are no graduates will be reviewed in accordance with Section 2-2-107.

- (f) It shall be in compliance with all applicable laws and regulations.
- (g) It shall be organized as a corporation, as a limited partnership with a corporate general partner, or as a limited liability company.
- (h) Its evaluation for accreditation shall be authorized by the chief executive officer.
- (i) Its owners or managers shall not have been debarred by ACICS. (See Section 2-3-900.)

Chapter 3 Classification of Campuses and Institutions

INTRODUCTION

ACICS is an institutional accrediting body that accredits entire institutions. It does not separately accredit individual campuses or programs. All approved locations and programs are included within the institution's grant of accreditation. Therefore, all campuses must meet the standards established by the Council and must be evaluated accordingly. The specific method by which compliance with these standards is evaluated and accreditation is conferred depends upon the classification of campuses and the institutions they comprise.

1-3-100 – CLASSIFICATION OF CAMPUSES

The Council classifies campus activities into two categories: main and branch campus.

1-3-101. *Main.* A main campus is the primary location of an institution to be accredited by ACICS. This campus is expected to meet fully all applicable standards set forth in the *Accreditation Criteria*.

1-3-102. *Branch Campus.* A branch campus is a location of an institution that is geographically apart and independent of the main campus of that institution, but under the same corporate structure as the main campus (i.e., part of the main campus corporation or a wholly owned subsidiary). The branch campus is permanent in nature, offers courses in educational programs leading to a degree, certificate, or other recognized educational credential, and has its own budget, faculty, administrative staff, and supervisory organization.

Full disclosure must be made in the catalogs of the main campus and/or branch campus as to the credentials and programs offered at each location. A branch campus may publish its own catalog.

1-3-103. *Learning Site.* A learning site is a classroom extension of a main or branch campus that is within a five-mile radius of the managing campus and maintains academic quality by providing sufficient academic and administrative oversight and access to all student services and instructional resources. Learning sites that are greater than five miles from the managing campus and offer student transportation to the managing campus or are used for delivery of distance education activity or collaborative arrangements with other entities for specific on-site educational activity must be approved by the Council on a case-by-case basis and are subject to a quality assurance visit as specified by the Council. All learning sites are subject to an on-site evaluation visit during the managing campus renewal of accreditation evaluation visit.

1-3-200 – CLASSIFICATION OF INSTITUTIONS

1-3-200. *Classification of Institutions.* The Council classifies institutions into two categories: single-campus and multiple-campus.

1-3-201. *Single-Campus Institution.* A single-campus institution is an institution that provides educational programs at one main campus. Accreditation is granted to the institution.

1-3-202. *Multiple-Campus Institution.* A multiple-campus institution is an institution that provides educational programs at one main campus and one or more branch campuses. Compliance with the *Accreditation Criteria* of the main campus and its branch campuses is reviewed separately. Accreditation is granted to the institution at the main campus, with the specific inclusion of each of the branch campuses.

TITLE II GENERAL PROCEDURES

Chapter 1 Gaining and Maintaining Accreditation

INTRODUCTION

This chapter outlines the steps that institutions must follow and the procedures utilized by ACICS leading to and following the award of accreditation status. Accreditation is a deliberate and thorough process and is entered into for purposes of quality assessment and institutional enhancement. When an institution applies for and receives a grant of accreditation, it is committing itself to operate in accordance with the standards and policies established by the Council throughout the term of the grant.

Inasmuch as accreditation is given for a specified period of time not to exceed six years, ACICS uses the term “initial grant” to connote the first time an institution is accredited. The term “renewal of accreditation” indicates a continuing status with ACICS after an institution has reapplied, has been reevaluated, and, in effect, has been reaccredited.

2-1-100 – ACCREDITATION WORKSHOP REQUIREMENTS

The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops, Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials, which are due two weeks prior to an on-site visit. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple-campus institutions are required to attend.

2-1-200 – INITIAL ACCREDITATION

All communications concerning initiation of the accrediting process for an institution should be sent to the ACICS office. The accrediting process proceeds in distinct phases, each of which must be satisfactorily completed by the institution before the next can occur. Each phase must be authorized by the chief executive officer of the institution, who also can authorize voluntary withdrawal from the process at any time prior to final action by ACICS.

When considering whether to award an initial grant of accreditation to an institution, ACICS will take into consideration the actions of other recognized accrediting agencies that have denied accreditation to the institution, placed the institution on probationary status, or revoked the accreditation of the institution. If an institution’s accreditation was withdrawn or denied previously by ACICS, its initial application will be considered only after at least two years have elapsed.

2-1-201. *Preliminary Review.* The institution must request in writing a preliminary review and receive a determination as to whether it is eligible to apply for accreditation as a single campus institution or a multiple campus institution. Such a preliminary review does not constitute an application.

To be eligible for accreditation, the institution must meet the eligibility criteria outlined in Title I, Chapter 2, and the definitions of campuses and institutional types outlined in Title I, Chapter 3. In addition, it must have graduated at least one class at each credential level it offers. Programs offered at any credential level from which there are not graduates will be reviewed as required in Section 2-2-107.

2-1-202. Application. The institution, after receiving a favorable preliminary review, shall submit a formal application for accreditation on forms supplied by ACICS. By submitting an application for an initial grant of accreditation, the institution agrees to be bound by the standards contained herein, including the ACICS Bylaws contained in Appendix A.

The institution shall certify that the requirements covered in Title I, Chapter 2, "Eligibility Criteria" have been met. The application forms, eligibility certification, supporting documents required in the application form, and the nonrefundable application fee shall be submitted to ACICS.

Once an institution has been determined to be eligible for evaluation, filed a formal application, and remitted the application fee, the application is kept active for a period of one year.

2-1-203. Resource Visit. Following a determination by staff of the completeness of the application materials, a resource visit will be made to the institution, at the institution's expense, to determine if it is ready to begin the self-evaluation. ACICS, at its discretion, may waive a resource visit if that institution has maintained a satisfactory standing with another recognized accrediting agency. A report of the resource visit will be made available to the school and to ACICS and will be used for advisory purposes only.

Initial applicants must submit audited financial statements certified by an independent certified public accountant for the institution's most recent fiscal year before a resource visit will be scheduled.

2-1-204. Self-Evaluation. Self-evaluation is the most important part of the accreditation process, requiring full involvement by administration, staff, and faculty. The Council publishes separate guidelines and materials to help institutions with the process.

2-1-205. Scheduling the Evaluation Visit. Council staff will schedule dates for the visit or visits to evaluate compliance of an institution at all of its locations. It is the responsibility of the institution to agree to dates for the visit(s) when classes are in session, faculty is teaching, administrative staff is available, and other operations are functioning normally.

2-1-300 – RENEWAL OF ACCREDITATION

It is the responsibility of the institution to file an application and remit the appropriate fees for a renewal of accreditation three months prior to the start of the assigned review cycle. This also involves submission of the institution's renewal self-study, with supporting documents. Institutions that have not submitted a renewal self-study at least two months prior to the start of the assigned review cycle, and have not requested and received an appropriate extension or notified the Council of intent to voluntarily withdraw its accreditation, will be subject to late fees and may be issued a show-cause directive. The accreditation previously granted to an institution expires automatically with the passage of time unless extended by an action taken by ACICS. An extension of the previous grant cannot exceed one year, and not more than one extension may be given except for extraordinary circumstances over which the institution has no control.

2-1-301. Application. The process of application for a renewal of accreditation is the same as for initial accreditation except that institutions are not required to undergo another resource visit. No substantive changes shall be made to the institution once the application has been submitted, leading up to the campus site visit. Multiple campus institutions that are applying for renewals of accreditation will be required to submit a separate self-study for each branch campus.

The Council will not consider an application for a renewal of accreditation unless all reports are current and all fees are paid. (See Sections 2-1-801 and 2-1-802.)

2-1-302. Withholding of Accreditation. A decision by ACICS, based upon the application and evaluation for a renewal of accreditation, not to award accreditation for a new period is considered to be the withholding of

accreditation, not the withdrawal of the previous grant of accreditation. The previous grant expires automatically with the passage of time unless the Council affirmatively extends the previous grant while it is considering the renewal of accreditation application. The Council always will give written reasons for withholding accreditation, and the matter from that point will be governed by procedures later described in Title II, Chapter 3, Council Actions.

ACICS will not award a renewal of accreditation to an institution that is subject to an interim action by another recognized institutional accrediting agency or a state agency that could lead to the suspension, revocation, or termination of that institution's accreditation or authority to provide postsecondary education. Further, a renewal of accreditation will not be awarded to an institution that has been notified by its state licensing agency of a threatened suspension, revocation, or termination by the state of the institution's legal authority to provide postsecondary education, and the due process rights required by the action have not been exhausted.

2-1-400 – VISITING TEAMS, SELECTION AND COMPOSITION

When an institution has submitted a satisfactory self-study and other required documentation, the office of the President will appoint a team to visit and evaluate the institution. The institution is notified of the composition of the visiting team and may request that team members be replaced for cause.

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 is experienced in management and is responsible for assuring that the visit is conducted fairly and thoroughly.

Appropriate state licensing and approval bodies are routinely notified of forthcoming visits and invited to participate in the visits as observers. They do not participate in team deliberations or in preparing the team report.

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. Full-team on-site evaluation visits will consist of individuals serving as academic, administrative, public, or member representatives as defined in Appendix A, Bylaws.

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.

2-1-403. *Evaluation of Separately Accredited Programs.* If, in compliance with Section 3-1-515, an attestation and documentation have been provided to ACICS that a program at an institution has been separately accredited by a specialized accreditor recognized by the U.S. Department of Education, or the Council for Higher Education Accreditation, or, for foreign institutions, the government or appropriately recognized organization providing specialized accreditation, ACICS at its sole discretion may accept those documents as evidence that the accredited program meets an acceptable level of quality.

2-1-404. *Staff Member on Visit.* A member of the ACICS staff accompanies teams on 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.

2-1-405. *Fees.* A fee will be assessed for this visit. Failure to remit payment for the visit fee may result in an adverse action.

2-1-500 – TEAM FUNCTIONS AND PROCEDURES

An institution is expected to be performing according to what it reported in its self-study and to be in compliance with the *Accreditation Criteria* at the time of 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 branch campuses are subject to evaluation, either in conjunction with the main campus or separately.

2-1-502. *Functions.* The functions of the evaluation team are to verify information in the institution's self-study and to report all facts observed during the visit as to how the institution is accomplishing its stated mission, or failing to do so, in compliance with the criteria.

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.

During the visit, institutions are expected to make provisions for adequate consultation between team members and the faculty, administrative staff, students, and chief on-site administrative officer.

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 recommendations for institutional improvement. The visiting team is not a decision-making body.

2-1-600 – POST-VISIT PROCEDURES

After the evaluation visit, the following post-visit procedures and reviews occur.

2-1-601. *Opportunity to Respond.* The ACICS office sends a copy of each evaluation team report to the designated representative at the main campus or to the chief on-site administrator of the respective multiple- or single-campus institution. These individuals are invited to respond 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), and any official reports from state or federal regulatory bodies.

The Intermediate Review Committee (IRC), upon intensive review of institutional files, makes recommendations to the Council of possible accreditation action.

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

2-1-700 – COUNCIL ACTIONS

Action by ACICS to accredit or renew accreditation or not to do so, or to limit or otherwise condition the grant of

accreditation, is determined only following review of the self-evaluation report prepared by the applicant institution, the report of the visiting team, the response of the institution to that report, the institution's financial condition, and the recommendations (if any) of the interim reviewers. At each level of review, the number and seriousness of any deficiencies are taken into account, as well as the institution's indicated willingness and capability to overcome them. The Council may, at its discretion, direct an institution to submit a teach-out agreement, as described in Section 2-2-303. Specific Council actions are discussed in Title II, Chapter 3.

2-1-701. *Maximum Length of Grants of Accreditation.* The Council determines the grant lengths of each institution that is accredited by ACICS. The maximum length of an initial grant of accreditation is three years. If an institution can demonstrate a record of having been in good standing with another institutional accrediting agency recognized by the United States Department of Education, the Council may award an initial grant of up to four years. The maximum length of a renewal grant of accreditation is six years.

2-1-800 – MAINTAINING ACCREDITATION

An institution, by successfully completing the process, inherently agrees to keep ACICS fully informed of activities at the institution. The Council requires an annual report from each main and branch campus, where appropriate. Institutional changes that must be reported to ACICS are described in Title II, Chapter 2.

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 branch campus. These reports are due on or before November 1 annually. Failure to submit the Annual Accountability Reports in a timely manner will result in the revocation of accreditation.

2-1-802. *Annual Financial Report.* The Annual Financial Report must be submitted on Council forms and be certified by an officer or stockholder of the corporation. Data must be submitted separately for each campus included in a grant of accreditation. It is due no more than 180 days after the end of the institution's fiscal year. Failure to submit the Annual Financial Report in a timely manner will result in the revocation of accreditation.

2-1-803. *Compliance Audits and Audited Financial Statements.* Title IV compliance audits and audited financial statements, certified by an independent certified public accountant, are essential instruments in the determination by ACICS of an institution's compliance with Title IV requirements and financial stability. All institutions are required to submit audited financial statements within 180 days of the end of their fiscal year. All institutions that participate in the Title IV program are required to submit the compliance audit within 180 days of the end of their fiscal year.

2-1-804. *Payment of Fees.* Institutions are required to pay all annual sustaining fees, user fees, evaluation visit deposits and expenses, and other assessed costs by the established deadlines. Non-payment of any fees or expenses subjects a member to revocation of accreditation without a hearing. (See Appendix A, Bylaws, Article VI, Section 5.)

2-1-805. *Unannounced Visits.* The Council, at its discretion, may direct an unannounced visit to occur at an institution, at any time. Procedures for unannounced visits are described in Appendix B.

2-1-806. *Denoting Accreditation.* Only after accreditation is granted by ACICS may an institution so denote its status in official publications or in advertising. The form of notice is prescribed by ACICS, and specific permissible language is set forth in Institutional Publications Requirements in Appendix C.

2-1-807. *Program Length and Tuition and Fees.* ACICS will determine average program lengths and tuition and fees annually based on information collected in the Annual Accountability Reports and will provide these data to all accredited institutions. Institutions with program lengths that are more than one standard deviation from the average will be required to submit an explanation for the deviation. If the Council does not accept the explanation,

it may require a consultation between ACICS and the institution, direct an on-site evaluation, issue a compliance warning, or withhold inclusion of the program from the institution's current grant of accreditation.

In assessing these relationships, the Council will consider institutional mission, program objectives and content, types and locations of instructional delivery, knowledge and skills necessary for students to reach competence, and additional requirements that may be placed upon a graduate for employability, including, if applicable, certification or licensure.

2-1-808. *Financial Review.* The Council reviews the Annual Financial Report, audited financial statements, and other relevant information to monitor each institution's financial condition. When this review indicates that an institution's financial condition may be weak or deteriorating, the Council will require the institution to furnish Quarterly Financial Reports, a Financial Improvement Plan, or other interim narrative reports that demonstrate the actions the institution is taking to improve its financial condition. If the Council determines the institution no longer complies with the Council's requirements for financial stability, the Council will issue a compliance warning, issue a show-cause directive, or otherwise take negative 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 financial stability. Institutions that are required to submit interim financial reports or that are determined to be out of compliance with the Council's standards for financial stability are considered to be on financial review and are subject to additional restrictions regarding the initiation of branches and learning sites.

2-1-809. *Student Achievement Review.* The Council reviews the Campus Accountability Report (CAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention, placement, and licensure or certification examination pass rates, if applicable. When this review indicates that the achievement of an institution's students is below benchmark, the Council will take action consistent with the guidelines outlined in Appendix L, Student Achievement Standards and Campus Accountability Reports.

2-1-810. *Student Loan Cohort Default Rates Review.* The Council will monitor an institution's student loan cohort default rates. An institution may be subject to additional reports or actions based upon these rates.

TITLE II GENERAL PROCEDURES

Chapter 2 Institutional Changes

INTRODUCTION

Approval by ACICS is required before substantive changes are published, advertised, and implemented, and institutions must notify ACICS of other changes. The material in this chapter explains the evaluation procedures that ACICS will follow for approving substantive and non-substantive changes.

2-2-100 – SUBSTANTIVE CHANGES

2-2-101. *List of Substantive Changes.* The following institutional changes will be considered substantive and require Council approval before they can be included in the institution's scope of accreditation:

- (a) any change in the established mission or objectives of the institution as described in Section 2-2-103;
- (b) any change in the legal status, form of control, or ownership of the institution as described in Section 2-2-400;
- (c) the addition of programs that are considered to be out of scope. Programs considered out of scope are those that represent a significant departure from existing programs that were offered when the agency last evaluated the institution as described in Section 2-2-105;
- (d) the addition of courses or programs that represent a significant departure from the existing delivery method utilized when the agency last evaluated the institution as described in Section 2-2-106;
- (e) the addition of programs of study at a degree or credential level different from that which is included in the institution's current scope of accreditation as described in Section 2-2-107;
- (f) a change from clock hours to credit hours as described in Section 2-2-108;
- (g) a 25 percent or greater change in the number of clock or credit hours awarded for successful completion of a program as described in Section 2-2-109;
- (h) the acquisition of any other institution (See Section 2-2-104(a) and 2-2-400) or any program (See Section 2-2-10 and 2-2-107) or location of another institution;
- (i) the addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study;
- (j) the entering into a contract under which an institution or organization not certified to participate in the Title IV, HEA programs offers more than 25 percent of one or more of the accredited institution's educational programs as described in Standard 2-2-505;
- (k) the establishment of a branch campus or learning site geographically apart from the main campus at which the institution offers at least 50 percent of an educational program as described in Standard 2-2-104; and
- (l) the proposed addition of a direct assessment competency-based program as described in Standards 2-2-111, 3-1-505, and Appendix H, Section 1.

It is required that the change occur within one year of approval. If the institution does not implement the change in this time frame, it shall notify the Council, and reapply for the change if it still seeks implementation. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

2-2-102. *Effect of Extensive Substantive Changes.* The Council shall conduct a comprehensive on-site evaluation

of the institution if substantive changes that have been made or are proposed are sufficiently extensive that the institution's capacity to maintain compliance with accreditation standards requires an immediate assessment. Substantive changes are defined by Council as "extensive" when the types and/or number of changes are so substantial that the nature and scope of the accredited institution will no longer be the same since last evaluated and in its place a new institution has evolved.

2-2-103. Change of Institutional Mission. It is the responsibility of the institution to secure approval from the Council prior to implementing any change in the mission or objectives of the institution.

2-2-104. Initiation of Additional Campus Activity. An additional activity includes any ongoing instructional activity offered at a site away from the main facility of an institution. Activity at a site that meets the Council's definition of a "Branch" is described in Section 1-3-100, Classification of Campuses. Activity at a site that does not meet the definition of a Branch Campus is referred to below as a "Learning Site." Reporting requirements are as follows:

- (a) *Branch Campus.* It is the responsibility of the institution to secure approval from ACICS of the intention to initiate a branch campus before the branch begins classes. If approved, activity must be initiated at the branch campus within one year of the proposed start date. A branch campus must be approved by the Council before advertising, recruiting, and enrollment may take place. Failure to secure approval from ACICS prior to the initiation of a branch campus may call into question the accreditation of the institution.

The institution shall provide, on Council forms, the rationale for initiation of the branch and other information about the educational programs, credentials to be awarded, faculty, learning resources, physical and financial resources, strength in supporting fields, admission and graduation requirements, compliance with state law and authority to operate, number of students, and administrative arrangements. An acceptable catalog which identifies the branch campus also shall be included as part of the application.

The Council will monitor the number of branch applications submitted for each main campus and main campuses under common ownership based on a demonstration of sound administrative and financial capabilities. The Council reserves the right to limit the number of branches based on its review of demonstrated administrative and financial capabilities.

Any institution which (1) is required to submit a financial improvement plan to the Financial Review Committee, or which (2) is under a deferral action by the Council must request and receive prior permission from ACICS for the initiation of any branch campuses. An institution under a show-cause directive or a negative action will not receive approval from ACICS for the initiation of any branch campus while the action is in effect.

- (b) *Learning Site.* It is the responsibility of the institution to secure approval from ACICS prior to initiation of any new educational activity which is under the direct control of the on-site administration of a main campus or branch campus and at a site that is apart from the primary location of that campus. In addition, if that activity involves 50% or more of an academic program, the learning site must be approved by the Council before advertising, recruiting, and enrollment may take place. If approved, activity must be initiated at the learning site within one year of the proposed start date. The institution shall provide, on Council forms, the location of the activity, its educational purpose, the programs offered, the number of students involved, and any additional information ACICS may request. A catalog for the campus which identifies the learning site also shall be included as part of the application.

Any institution which has a campus that (1) is under review by the Financial Review Committee of ACICS, (2) shows either a net loss or a negative net worth on its most recent financial report, (3) is required to report placement and/or retention data to the Institutional Effectiveness Committee, or (4) is under a deferral action by the Council must request and receive prior permission from ACICS for the initiation of any additional campus activity at which 50% or more of an academic program is provided. An institution under a show-cause directive or a negative action will not receive approval for the initiation

of any such additional campus activity while the action is in effect.

2-2-105. *Addition of Programs Out of Scope.* It is the responsibility of the institution to secure approval from the Council of the intention to initiate the addition of programs that represent a significant departure or are out of scope from existing educational programs that were offered when the agency last evaluated the institution. The institution or campus must initiate the approval process through the submission of a new program application and required documents for Council review and approval before being included in the institution's scope of accreditation.

2-2-106. *Initiation of Distance Education (Online) or New Instructional Delivery Method.* It is the responsibility of the institution to secure approval from the Council of the intention to initiate online delivery if all courses and programs within the institution are currently approved for residential or face-to-face instructional delivery method. Any significant change in instructional delivery method requires prior Council approval.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation information for Council review and approval before being included into the institution's current scope of accreditation.

2-2-107. *Expansion of Program Offerings to Higher Credential Level.* It is the responsibility of the institution to secure approval from the Council of the intention to initiate a program at a higher credential level.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation for Council review and approval before being included into the institution's scope of accreditation.

2-2-108. *Initiation of Change from Clock to Credit Hour Offering.* It is the responsibility of the institution to secure approval from the Council of the intention to initiate a change from clock to credit hours in its program offering through the submission of an application and required documentation.

2-2-109. *Increasing the Number of Clock or Credit Hours.* It is the responsibility of the institution to secure approval from the Council of the intention to initiate a change of 25 percent or greater in the number of clock or credit hours awarded for successful completion of a program. If the percentage is less than 25 percent but results in a change in the credential level, the credential level will be evaluated to be within the institution's scope of accreditation.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation for Council review and approval before being included into the institution's scope of accreditation. The institution shall notify the Council if it does not implement the changes within one year of approval. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

2-2-110. *Evaluation, Approval, and Monitoring of Substantive Change Activity.* All activity for which approval is sought will be evaluated by ACICS before approval is granted. Following is a description of those evaluations.

- (a) *Branch Campus.* Initial inclusion of a branch campus within the scope of the accreditation of the institution may be granted upon receipt of all required information. An institution proposing the initiation of a new location must follow the procedures as outlined by the Council and disclosed on its website. A new location must receive initial inclusion before advertising, recruiting, or enrolling students at the proposed location. The Council reserves the right to require a preliminary visit to any potential branch campus prior to the granting of initial inclusion.

A branch campus that is granted initial inclusion will be required to undergo a verification visit within six months after the initial class start date. Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

Only after a determination of acceptability and notification to the institution of the decision, may the institution consider a branch campus to be included within the scope of the institution's grant of accreditation. If approval is withheld, the withholding may be treated as a deferral or a denial, based on circumstances, and the institution may exercise its due process rights as outlined in Title II, Chapter 3.

- (b) *Learning Site*. The Council must evaluate and approve additions to a main or branch campuses that are apart from the primary location of that campus. Educational activities at a learning site are eligible to be evaluated for inclusion within the scope of the accreditation of the managing campus provided that the learning site has been established to meet a specific educational need or condition and is authorized by the appropriate governmental education authority, if applicable.

The managing campus proposing the initiation of a learning site must submit a Learning Site Application. The managing campus must assure the Council that the educational activities at the learning site complement the overall objectives of the institution. Based on its review of the application materials, ACICS may (1) grant inclusion of the learning site or (2) deny the application.

A learning site that is granted inclusion will be required to undergo a verification visit within six months after the initial class start date if 50% or more of a program will be offered at the site. Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

All additions to the campuses of an institution are evaluated during an institution's regular evaluation for a renewal of accreditation.

- (c) *New Programs of Study*. Changes to an institution's scope of accreditation resulting from the proposed initiation of a new program of study, must be approved by the Council following a comprehensive review of supporting materials specific to the substantive change. Only upon approval of the substantive change to the institution's scope of accreditation is the institution or campus authorized to advertise, recruit, and enroll students for the new program.

To further monitor the institution or campus which initiated the substantive change to the institution's scope of accreditation, an on-site evaluation visit will be conducted as directed by the Council.

Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

2-2-111. Addition of a Direct Assessment Competency-based Program. It is the responsibility of the institution to submit the required application for Council review and approval. The initial Council approval allows the institution to apply for submission of an application for approval of that competency-based program to the United States Department of Education for Title IV Federal student financial aid. (See also Standard 3-1-505 and Appendix H, Section I.)

2-2-120 – INITIATION AND EVALUATION OF CHANGES WITHIN CURRENT SCOPE

All programs and delivery methods must be within the institution's scope of accreditation and receive ACICS approval before recruiting or enrolling students. Programs offered by the institution are appropriately evaluated during the institution's initial grant of accreditation and renewal of accreditation evaluations.

The initiation of a new program, or a change in the overall objective of a currently approved program or in the credential level of an existing program, requires approval prior to implementation. The initiation of courses and programs offered via an online modality also requires approval prior to implementation. An application form and any additional documentation specified by ACICS must be submitted. Programs that have not started within one year of the proposed start date and programs that have been inactive for at least three years must be surrendered as defined in Section 2-2-503, *Termination of Programs*. Institutions or campuses must have demonstrated compliance with ACICS standards at a lower credential level before requesting a new program at a higher credential level.

Any institution or campus 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 or campus under a compliance warning, a show-cause directive or a negative action must obtain prior approval to apply for a new program. Additionally, any institution or campus 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.

2-2-121. *Changes to Existing Programs.* Changes to existing or currently approved programs fall under (a) extensive changes and (b) non-substantive changes.

- (a) *Extensive Changes.* An extensive change to existing program application process must be initiated and approval received prior to implementation. Failure to do so will result in a compliance warning for offering an unapproved program. The following changes will be considered substantive changes to the institution's scope of accreditation and require approval per Section 2-2-100 - Substantive Changes:
 - 1) a 25 percent change in the number of clock or credit hours awarded for successful completion of an existing program; and
 - 2) a change from clock hours to credit hours.
- (b) *Non-substantive Changes.* These include minor changes to existing programs which do not substantially alter the scope, objectives and nature of the programs as described in Section 2-2-151.

2-2-122. *Substantial Changes to Nonmain Campus Operations.* Prior notification to ACICS is required when an institution decides to make substantial changes to the operation of a nonmain campus. Notice shall be made in writing to the President, who is authorized to act on behalf of ACICS in approving such changes. Failure to notify and receive approval prior to substantial change of activity may call into question the accreditation of the institution, and further evaluation may be required.

2-2-151. *Non-Substantive Program Changes.* Institutions and campuses are required to notify the Council of all non-substantive changes to existing program prior to implementation. The following non-substantive changes will be acknowledged:

- (a) less than 25 percent change in existing contact hours; credits awarded, curriculum content (courses offered), or program length of a currently approved program within a 12-month period;
- (b) a change in the name of an existing program that does not change the overall objective of the program; and
- (c) a change from semester to quarter credit hours or vice versa.

If the institution applies for acknowledgment of non-substantive program changes prior to implementation but chooses not to implement the changes within one year of approval, it must notify the Council. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

2-2-152. *Non-Substantive Changes to Campus Operations.* As a condition for maintaining its accreditation status, the institution is expected to keep ACICS informed of changes affecting campus operations.

2-2-200 – REDESIGNATION OF CAMPUSES

2-2-201. *Branch-to-Main Campus Reclassification.* A branch is eligible for evaluation as the freestanding main campus of a separately accredited, single campus institution only if it has been operating as an approved branch for at least two years. Branches seeking main campus status must submit the appropriate application, and audited financial statements certified by an independent certified public accountant for the institution's most recent fiscal year. The Council reserves the right to conduct an on-site quality assurance monitoring visit at any time as it deems necessary.

2-2-202. *Reassignment and Consolidation of Campuses.* Institutions seeking to reassign the classification of a campus or campuses or to consolidate groups of campuses must submit the appropriate application and

documentation, including the rationale to the Council. The Council will consider the institution's requested grant expiration date for the newly formed group of campuses and assign modified or full-team evaluation visits as necessary to bring the grant lengths of the various groups of campuses into alignment. The scope and timing of these visits will be based on the length of the grant of accreditation for each group being reassigned or consolidated, as well as a review of determining factors such as retention and placement rates, reporting status, complaints and adverse, and any other pertinent information. No campus will be given an extension of its current grant longer than one year for purposes of the consolidation, and new campuses moving through the branch inclusion process will be visited as part of that process, regardless of the consolidation proposal. The Council reserves the right to assign an on-site evaluation visit at either the main campus or branch campuses at any time as it deems necessary.

2-2-300 – CLOSING OF A CAMPUS

In all instances of termination of activity at either main or nonmain campuses, ACICS must be assured that provision is made for presently enrolled students to complete the program of instruction for which they have enrolled, either at that institution or at another acceptable institution. In addition, ACICS must be assured that student academic transcripts are safely stored and protected and that the transcripts will be accessible to students and alumni indefinitely. ACICS and the appropriate regulatory agency must be notified of the arrangements made in this regard.

2-2-301. *Closing of a Main Campus.* An institution is required to notify ACICS as far in advance as possible when it plans to cease operation. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The institution's grant of accreditation will be revoked as of the effective date of closing.

When ACICS receives information from any source that an institution has ceased to operate, it shall immediately take steps to verify the information. If the Council believes that the institution, in fact, has ceased operations, the grant of accreditation is summarily suspended. Such action is authorized without prior notice or hearing and with immediate public notice.

The institution shall be notified of the summary suspension in writing at its address of record. Within 10 days after receipt of the suspension notice, the institution may petition ACICS for an expedited determination of whether such suspension should be withdrawn. If no petition is filed within 10 days, the suspension automatically shall become a revocation effective as of the date of notice of suspension.

2-2-302. *Closing of a Nonmain Campus.* An institution is required to notify ACICS as far in advance as possible when it plans to close a nonmain campus. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The nonmain campus will cease to be included in the institution's grant of accreditation as of the effective date of the closing.

2-2-303. *Teach-out.* The Council will require an institution to provide a teach-out plan in the following instances:

- (a) The Secretary of Education notifies ACICS that it has initiated an emergency action against an institution or an action to limit, suspend, or terminate participation in Title IV programs, and that a teach-out plan is required;
- (b) ACICS acts to deny or withdraw the accreditation of an institution;
- (c) The institution notifies ACICS that it intends to cease operations or close a location that provides 100% of at least one program;
- (d) A state licensing or authorizing agency notifies ACICS that an institution's license or legal authorization to provide educational programs has been or will be revoked; or

- (e) A result of adverse information, high cohort default rate(s), low retention and/or placement rate(s), financial instability, or other concerns that may call into question the institution's ability to continue to serve the educational needs and objectives of its students or to continue as an on-going concern.
- (f) At the discretion of the Council, the teach-out plan may include a formal teach-out agreement with another institution.

If an institution closes or announces its intent to close, the Council will work to the extent feasible with the U.S. Department of Education and the appropriate state regulatory agencies to ensure that students are given reasonable opportunities to complete their education without additional charge. An institution that closes without completing its contractual training obligations to students must refund all unearned revenue.

Should an institution enter into a teach-out agreement with another accredited institution, the signed agreement must be submitted to and approved by the Council prior to implementation. In addition to general information on the institutions entering into the teach-out agreement, the agreement must demonstrate the following:

- (a) that students will be provided, without additional charge, all of the instruction promised but not yet provided by the closing institution; and
- (b) that the teach-out institution is geographically proximate to the closing institution or otherwise can provide students with reasonable access to its programs and services, and that it has the necessary experience, resources, and support services to provide an educational program that is of acceptable quality and is reasonably similar in content, structure, and scheduling to that provided by the closing institution.

2-2-400 – OWNERSHIP OR CONTROL

The Council at all times must know who is in control of an accredited institution. The transfer of ownership or a change in the control of an institution is a substantial change that must be approved by the Council before continuation of accreditation can occur. Any institution or owning corporation that is contemplating a transaction that may result in a change of ownership/control must submit the appropriate application and supporting documentation to the Council for approval 30 days prior to consummating the proposed change. Failure to provide this notification in a timely manner may negatively impact the continuation of accreditation. Transactions that constitute a change of ownership/control vary depending on the structure of the entity that owns or controls the institution.

Accredited institutions are owned or controlled by one of several types of corporations, by a limited partnership with a corporate general partner, or by a limited liability company, each of which is defined in the following subsections. In cases where the entity that directly owns or controls the institution is a subsidiary of another entity, the Council requires information on and monitors the ownership of the controlling entity, the parent entity, and any entities in the chain between those two.

- (a) *Privately held corporation.* A privately held corporation is one that operates for profit in which one or more stockholders own the voting stock of the corporation. The stock is marketable, but a majority of the voting stock is not traded on public markets overseen by governmental agencies such as the Securities and Exchange Commission in the United States. The control of a privately held corporation is vested in those in control of a majority of the voting stock of the corporation.
- (b) *Publicly traded corporation.* A publicly traded corporation is one that operates for profit in which a majority of the voting stock is traded on public markets overseen by governmental agencies such as the Securities and Exchange Commission in the United States. The control of a publicly traded corporation is vested in the voting members of the board of directors of the corporation.
- (c) *Not-for-profit corporation.* A not-for-profit corporation is one that has been determined by a governmental agency to be tax exempt for reasons the same as or similar to those set forth in Section 501 of the Internal Revenue Code of the United States. The control of a not-for-profit corporation is vested in

the voting members of the board of directors of the corporation.

- (d) *Limited partnership with corporate general partner.* A limited partnership is one that is organized in accordance with the partnership laws of its home jurisdiction. The control of the limited partnership is vested in the general partner, which must be a corporation as defined in subsection (a), (b), or (c) above.
- (e) *Limited liability company.* A limited liability company is one that has been granted a certificate of approval under the laws of the state corporation office or other appropriate regulatory body in its home jurisdiction. A limited liability company may or may not issue certificates of ownership. The control of a limited liability company is vested in the members, whose ownership interests are defined in the limited liability company operating agreement or other such governing document, who are in control of a majority of the direct or beneficial ownership interest in the company.

2-2-401. Change of Ownership or Control. A change of ownership or control generally means that a transaction has occurred whereby a new person, combination of persons, or entity can exercise control of a corporation or limited liability company as described in Section 2-2-400. The following subsections outline the typical changes of ownership or control of the three types of corporations that own accredited institutions, including corporate general partners in limited partnerships, and limited liability companies. Transactions other than those outlined below, however, may constitute a change of ownership or control, and the Council reserves the right in its discretion to make the determination of whether a change of ownership or control has occurred in all cases. Institutions, therefore, must keep the Council informed of all substantive changes in the ownership of stock and the composition of the board of directors.

In addition to the transactions outlined below, any change from one type of entity to another as defined in Section 2-2-400 constitutes a change of ownership or control. Institutions also are reminded that nonmain campuses cannot be bought or sold independently of their main campus.

- (a) *Privately held corporation.* A change of ownership or control of a privately held corporation occurs as a result of any of the following transactions:
 - (i) the transfer of 50% or more of the total outstanding voting stock from one party or parties to another party or parties;
 - (ii) a transfer of voting stock that results in the ownership of 50% or more of the total outstanding voting stock by any party other than any previous owner of 50% or more of the total outstanding voting stock;
 - (iii) a transfer of voting stock whereby a stockholder's ownership of outstanding voting stock decreases from more than 50% to 50% or less, or from 50% to less than 50%; or
 - (iv) any other transaction whereby a stockholder or group of stockholders who previously could not exercise control of the corporation as described in Section 2-2-400(a) now can exercise control.
- (b) *Publicly traded corporation.* A change of ownership or control of a publicly traded corporation occurs as a result of any of the following transactions or events:
 - (i) the change of 50% or more of the voting members of the board of directors in any rolling, 12-month period;
 - (ii) a change in the number of voting members of the board of directors in any rolling, 12-month period that will allow a group of directors to exercise control who could not exercise control before the change;
 - (iii) the acquisition of outstanding voting shares by any entity whereby that entity owns 50% or more of the total outstanding voting shares; or
 - (iv) any other transaction that is deemed by an appropriate governmental agency to constitute a change of control, including but not limited to a transaction that requires the corporation to file Form 8-K with the Securities and Exchange Commission of the United States.
- (c) *Not-for-profit corporation.* A change of control of a not-for-profit corporation occurs as a result of any of

the following occurrences:

- (i) the change of 50% or more of the voting members of the board of directors in any rolling, 12-month period; or
- (ii) a change in the number of voting members of the board of directors in any rolling, 12-month period that will allow a group of directors to exercise control who could not exercise control before the change.
- (d) *Limited partnership with corporate general partner.* A change of ownership or control of a limited partnership with a corporate general partner occurs when the corporate general partner has undergone a change of ownership or control as defined in subsection (a), (b), or (c) above.
- (e) *Limited liability company.* A change of ownership or control of a limited liability company occurs as a result of any of the following transactions:
 - (i) the transfer of 50% or more of the direct or beneficial ownership interest from one member or members to another member or members;
 - (ii) a transfer of direct or beneficial ownership interest that results in the holding of 50% or more of the total direct or beneficial ownership interest by any member other than any previous member who owned 50% or more of the total direct or beneficial ownership interest;
 - (iii) a transfer of direct or beneficial ownership interest whereby a member's direct or beneficial ownership interest decreases from more than 50% to 50% or less, or from 50% to less than 50%; or
 - (iv) any other transaction whereby a member or group of members who previously could not exercise control of the company as described in Section 2-2-400(e) now can exercise control.

A change of ownership or control also occurs when ownership or control of the primary assets of an institution or the authority to operate an institution is transferred from the controlling corporation, limited partnership, or limited liability company to another corporation, limited partnership, or limited liability company. A change of ownership or control, however, has not occurred when there is a transfer of assets among wholly owned subsidiary corporations or between a wholly owned subsidiary corporation and its parent corporation; a transfer of assets from a subsidiary corporation to its parent corporation where the parent corporation owns a majority of the outstanding stock of the subsidiary corporation; or a transfer of assets among subsidiary corporations where the common parent owns a majority of the outstanding stock of the subsidiary corporations.

The Council, for purposes of determining ownership or control, views married couples as a single entity, and it views closely related family groups as a single entity in most cases where all of the present and future relevant stockholders actively participate in the management of the corporation. No change of ownership occurs when stock is transferred to a close family member by operation of law or inheritance upon the death of one of the stockholders.

2-2-402. *Contingent Sales.* The Council will not grant reinstatement of accreditation after a change of ownership or control if the sale of the stock or assets triggering the change of ownership is contingent on approval of the transaction by the Council. If the transaction is rescinded as a result of a condition subsequent to the change of ownership or control of an institution, then the previous owner must apply to the Council for reinstatement.

2-2-403. *Change of Ownership or Control Review Procedures.* Institutions must submit Part I of the change of ownership/control application 30 days prior to the transfer of ownership or change in control occurs. Part II of the change of ownership/control application must be submitted within five business days after the transaction. The following procedures govern the Council's review of change of ownership/control:

- (a) *Automatic Discontinuation.* Any change of ownership or control results in the immediate and automatic discontinuation of an institution's grant of accreditation. The grant of accreditation may be reinstated only upon application to and approval by the Council. Because the discontinuation results without action or prior approval on the part of the Council, this change in status does not constitute withdrawal of accreditation and is not a negative action.

- (b) *Reinstatement.* After the grant of accreditation has been discontinued, it may be reinstated at the discretion of the Council within 30 days of the change in ownership/control. Those terms and conditions of the reinstatement process are set forth in policy statements issued to the field and in the change of ownership/ control application document that institutions must file to initiate the reinstatement process. The Council will conduct a quality assurance monitoring visit within six months of the effective date of a change of ownership/control. The new owner(s) and the chief on-site administrator must provide evidence of attending an ACICS Accreditation Workshop within one year of the change of ownership or attend an Accreditation Workshop prior to the quality assurance monitoring visit.
- (c) *Effect.* Until the Council approves a reinstatement of the grant of accreditation, the accreditation of the institution remains in abeyance. If approval of the application for reinstatement is withheld, the matter will be treated procedurally as a deferral or a denial, as the case may be. (See Title II, Chapter 3, Council Actions, for further information.)

2-2-500 – PROGRAMS OF STUDY REGULATIONS

2-2-501. *Evaluation of Programs for Purposes of Federal Financial Aid.* As part of its evaluation of an institution for initial accreditation or renewal of accreditation, ACICS will review the institution's policies and procedures for determining credit hour assignments for purposes of awarding federal financial aid. ACICS will evaluate the reliability and accuracy of the institution's assignment of credit hours, as defined by federal requirements, to courses and programs and will determine whether this assignment conforms to commonly accepted practice in higher education.

- (a) *Credit Hours for Credit-Hour Programs.* The evaluation of credit hour programs, as defined by federal requirements, for purposes of financial aid is based on the following federal definition of a credit hour:
Except as provided in federal regulations, a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—(1) 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, or the equivalent amount of work over a different amount of time; or (2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.
- (b) *Credit Hours for Programs that are neither Credit-Hour nor Clock-Hour Programs.* Clock hour programs as defined in federal regulations may not assign credit hours for the purpose of awarding federal financial aid. However, undergraduate degree programs of less than two years in length and non-degree programs that are not fully transferrable to degree programs of at least two years in length (with at least two graduates) at the same institution are eligible to convert clock hours to credit hours for purposes of awarding federal financial aid. In doing so, these programs may seek to combine a minimum number of hours in a range of hours of student work outside of class with a required minimum number of hours of instruction alone to meet or exceed a total number of clock hours of instruction. The evaluation of these clock-to-credit hour programs is based upon the following federal conversion formulas:

The institution's student work outside of class combined with the clock hours of instruction meet or exceed the following numeric requirements:

- (i) A semester hour must include at least 37.5 clock hours of instruction;
- (ii) A trimester hour must include at least 37.5 clock hours of instruction; and
- (iii) A quarter hour must include at least 25 clock hours of instruction; and

The clock hours of instruction alone meet or exceed the following numeric requirements:

- (a) A semester hour must include at least 30 clock hours of instruction;
- (b) A trimester hour must include at least 30 clock hours of instruction; and

- (c) A quarter hour must include a least 20 hours of instruction.

2-2-502. Program Show-Cause or Compliance Warning. When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure or certification examination pass rates, the institution will be provided in writing with a show-cause or compliance warning regarding the alleged deficiency in accordance with the guidelines outlined in Appendix I, Student Achievement Standards and Campus Accountability Reports.

2-2-503. Termination of Programs. The withdrawal of approval for a program following the issuance of a program show-cause or compliance warning or a decision by an institution to terminate any program voluntarily must be appropriately communicated to all interested publics. These publics include, but are not limited to, students, governmental agencies, the local community, and ACICS.

All institutions subject to the withdrawal of approval for a program or who voluntarily terminate an approved program will be directed to submit a program termination plan that conforms to the following requirements. New students may not be enrolled in any program which cannot be completed prior to the termination date for which public notice has been given. Moreover, the institution is obligated to continue to offer appropriate courses, including prerequisites, so that currently enrolled students will be able to complete the program and receive the credential which was their designated educational objective. For this purpose, the period of time need not extend beyond sufficient time for students already enrolled and maintaining normal academic progress to complete the program.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only.

To maintain approval, an institution must demonstrate active enrollment in each program of study. If an approved program is inactive for at least two years, the program will be considered discontinued and will be removed from the institution's list of approved programs. To reinstate the program, the institution must initiate a new program application process. Programs that have not started within one year of the proposed start date will be surrendered. To reinstate the program, the institution must initiate a new program application process. Requests to extend a new program's proposed start date beyond one year of the initial date must be submitted to the President.

2-2-504. Contracts or Agreements with Accredited Institutions. A written arrangement between one institution eligible to participate in HEA Title IV financial aid programs and another eligible institution or with a consortium of such institutions permits an institution to arrange for a portion of its approved program to be delivered by another accredited institution. Contracts or consortium agreements describing these arrangements must be in writing and must be disclosed in the catalog. Institutions are advised that specific state and federal regulations may apply.

- (a) The entire consortium agreement must be submitted to and approved by the Council prior to the institution's participation in the arrangement. The institution seeking approval of such an agreement must submit documentation that demonstrates that the other institution or the members of the consortium that will deliver instruction hold institutional accreditation from an accrediting agency recognized by the U.S. Department of Education and that the portion of the program to be delivered by any other institution has been approved by that institution's accrediting agency.
- (b) The consortium agreement must identify how the curriculum and instruction will be monitored, how curriculum revisions will be undertaken, and how student grievances will be addressed. The institution seeking approval of a consortium agreement must acknowledge in writing that it retains ultimate responsibility for the delivery of its programs and the satisfaction of its students.
- (c) More than 50% of the program must be delivered by the institution that awards the academic credential.

2-2-505. Contracts with Unaccredited Institutions or Entities. An institution may enter into a contract with an

unaccredited institution or entity for the delivery of up to 25% of a program of study.

The institution must submit the contract and provide the following information to ACICS for review and approval prior to the initiation of the contract:

- (a) a full catalog description of the program and the services to be provided by the contractor;
- (b) a systematic plan for administrative and student evaluations of instructors provided by the contractor;
- (c) evidence of the qualifications of faculty to teach the contracted courses;
- (d) a description of the instructional facilities provided by the contractor; and
- (e) plans for the completion of the program should the contractor fail to provide contracted services.

2-2-506. *Articulation Agreements with Secondary Schools.* An institution may enter into an articulation agreement with a secondary school to transfer credit for courses taken at the secondary level that are equal to courses offered in a postsecondary institution. Articulation agreements must be in writing, periodically reviewed, signed, and dated. The institution must maintain a file consisting of the following: (1) a Letter of Intent to Articulate signed by both institutions specifying the numbers and titles of courses to be articulated, (2) a written description of the standards for acceptable transfer of credit, and (3) a comparison of the course objectives of the secondary and postsecondary courses(s) with signed approvals of both institutions. These credits appear on both the secondary and postsecondary transcripts.

2-2-507. *International Partnership Agreements.* An ACICS-accredited institution may enter into an international partnership agreement with an institution of higher education in a geographic location other than that of the United States or its territories. At least 25% of the program must be delivered by the institution that awards the academic credential.

The ACICS-accredited institution must submit an international partnership agreement to the Council and provide the following information to ACICS for review and approval prior to the initiation of the partnership agreement:

- (a) evidence provided by the institution or agency that the international partner and the programs to be delivered are recognized by an educational approval agency equivalent to an accrediting agency recognized by the US Department of Education;
- (b) a full catalog description of the program and the services to be provided through the partnership agreement;
- (c) a plan which describes recruitment, admission, standards of satisfactory academic progress;
- (d) a plan which describes student financial relations, including tuition and fees, and refund policies;
- (e) a description of the program(s) of study or courses offered;
- (f) a systematic plan for administration and student evaluations of instructors provided by in the partnership agreement;
- (g) evidence of the qualifications of faculty to teach;
- (h) a description of the instructional facilities at the international site;
- (i) a plan for the completion of the program(s) should the international partner fail to provide agreed upon services;
- (j) a plan for the safety and security of students, faculty, and staff; and
- (k) specify which programs or portions are to be delivered via distance education and how the institutions will monitor growth.

2-2-600 – OTHER CHANGES

2-2-601. *Change of Name.* The Council must be notified and grant approval when an institution decides to change its name. Forms are supplied for the institution to explain and justify the change. The President has the

authority to review and approve a change in name. The following limitations apply: “university” may be used only by those institutions that offer a master’s degree. These limitations are effective for all Change of Name applications received after January 1, 1997. All institutional names approved prior to that date may be retained.

2-2-602. *Change of Location.* The Council must be notified and grant approval when an institution decides to change its physical location or its address and prior to the initiation of classes at any new location. Forms are supplied for the institution to explain and justify the change. The President has the authority to review and approve a change of location. In addition, the President may require an on-site evaluation visit as part of its review in order to determine compliance with Council standards.

TITLE II GENERAL PROCEDURES

Chapter 3 Council Actions

INTRODUCTION

When the Council has considered all of the information and reports submitted as a result of the accrediting process, it will make a judgment as to an institution's compliance with the *Accreditation Criteria*. The Council's decision is based on the extent of an institution's compliance. The judgment made is referred to as a "Council action." The actions which the Council may take are described in this chapter. Procedures available to institutions to challenge those actions and the maximum time frames for achieving final disposition of those actions by the Council also are explained. There are four general areas of Council actions: accreditation granted, accreditation deferred, accreditation denied, and accreditation withdrawn.

If the Council determines that an institution is not in compliance with the *Accreditation Criteria*, it will take prompt adverse action against the institution, or it will require the institution to take appropriate action to bring itself into compliance with the *Accreditation Criteria* within a time frame specified by the Council after the institution has been notified that it is not in compliance. That time frame will not exceed and may be less than the following:

- (a) twelve months, if the longest program is less than one year in length;
- (b) eighteen months, if the longest program is at least one year, but less than two years in length; and
- (c) two years, if the longest program is at least two years in length.

The above 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 completion or placement rates. In no event will the good-cause extension exceed one year.

2-3-100 – ACCREDITATION GRANTED

If an institution is found to be in compliance with the *Accreditation Criteria*, ACICS may grant accreditation for a specific period of time from a minimum of one year to a maximum of six years. The length of the grant shall be at the discretion of ACICS. A grant of accreditation for less than six years is not a negative action and, therefore, is not appealable.

The Council will not grant accreditation for a full six-year term if the grant is awarded following any hearing resulting from a previous action to deny accreditation.

2-3-200 – ACCREDITATION DEFERRED OR CONDITIONED

The Council, upon review of relevant information concerning an institution, may take any of the following actions at any time in accordance with the procedures described, up to and including a final adverse action.

2-3-210. *Deferral.* When Council determines there is insufficient evidence available to make a decision, it may defer action until a later date pending receipt of additional information. In such cases, the Council will provide in writing the reasons for the deferral, state what the institution needs to provide with sufficient time for the institution to respond, and specify the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, "no action at this time" and is not a negative action. Therefore, deferral is not an appealable

action. Neither is deferral a final action. In all cases of deferral on renewal of accreditation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed.

2-3-220. *Compliance Warning.* When the Council determines that an institution is not in compliance with the *Accreditation Criteria*, the Council may issue a compliance warning. The institution will be provided in writing with the areas of noncompliance and will be required to demonstrate corrective action for review by ACICS.

The Council may issue a show-cause directive or a denial action as the result of reviewing a compliance warning as described in Section 2-3-230 or 2-3-402. Following receipt of a compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to a final adverse action.

2-3-230. *Show-Cause Directive.* Show-cause is a status that the Council may impose on an institution when it determines that the institution or one of the campuses within the institution does not materially operate in accordance with the *Accreditation Criteria*. The Council will provide a written summary of the areas of noncompliance to the institution, which will be required to provide evidence of corrective action for review by ACICS. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or be subject to an adverse action.

The issuance of a show-cause directive may be considered the basis for an institutional review, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of the Council's review of the institution's response, and such action is considered a final action that may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a show-cause directive by the Council will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

2-3-231. *Result of Show-Cause.* The Council will not accept any applications for new programs or new campuses from any institution on show-cause unless approval is received in advance to submit such an application.

2-3-232. *Vacate Show-Cause.* If the institution demonstrates that it has addressed the Council's concerns and is operating in compliance with the *Accreditation Criteria*, then ACICS may vacate the show-cause. The Council may also order a special visit at the institution's expense before lifting the show-cause.

2-3-233. *Notification of Show-Cause.* The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on show-cause. The institution is required to notify immediately its current and prospective students along with the public of its show-cause status through appropriate means, including posting a prominent notice on its website.

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 by a panel of the Review Board of Appeals. 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 Renewal of Accreditation or Denial of Reinstatement of Accreditation Following Change of Ownership/Control. An institution that objects to a Council decision to deny an application for a renewal of accreditation or reinstatement of accreditation following a change of ownership or control has the right to appeal the decision to the Review Board of Appeals pursuant to the procedures described in 2-3-604.

Additionally, in cases of denial of a renewal of accreditation, or reinstatement of accreditation following a change of ownership or control, the Council may issue a show-cause directive as described in Section 2-3-230.

2-3-303. Denial Actions Not Affecting Overall Accreditation. An institution that objects to a Council decision to deny an application for the addition of a program within the institution's current scope of accreditation or any substantive change addressed in Section 2-2-101 will be given the opportunity to present its case in writing to the Council.

2-3-304. Subsequent Action Following Denial. If the denial not affecting overall accreditation is affirmed, the denial action becomes final and no further remedy is available to the institution. In all cases of denial, the Council retains discretion to specify whether and under what conditions the institution might initiate a request for consideration of the same type of application.

2-3-400 – ACCREDITATION WITHDRAWN

“Withdrawal of accreditation” differs from “denial of accreditation” in that denial rejects an institution’s application for an initial grant of accreditation or for a renewal of accreditation to take effect upon the expiration of an existing grant of accreditation; withdrawal of accreditation takes away a current grant of accreditation before its expiration. Accreditation may be withdrawn from an institution or inclusion withdrawn from a branch campus through two types of Council action: “revocation of accreditation” or “suspension of accreditation.”

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:

- (a) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (b) An institution or campus fails to submit a written response to a show-cause directive by the indicated due date.
- (c) An institution or campus whose accreditation has been summarily suspended does not challenge the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (d) The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801 and 2-1-802.)
- (e) The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

2-3-402. Suspension. Suspension of accreditation may occur when, in the judgment of ACICS, an institution or one of the campuses within the institution no longer complies with the criteria.

By way of illustration, ACICS might issue an order of suspension for reasons such as the following:

- (a) The institution or any of its components (a branch or new program, for example), is evaluated as directed by ACICS and is determined not to be in compliance with the criteria.
- (b) Periodic required reports filed by the institution or campus fail to conform to Council reporting requirements.

- (c) The institution or campus makes substantial or significant change, without notice to ACICS, in its operation, structure, governance, ownership, control, location, facilities, or programs of study.
- (d) The institution or campus fails to respond to or cooperate with attempts by the Council to make arrangements for a site evaluation.
- (e) The institution or campus has deviated from the criteria or other directives of ACICS.
- (f) The institution or campus fails to disclose any agreements, options, or other contractual arrangements between the institution and other parties which bear on the management or control of the main campus or its non-main campuses.

In all cases of suspension, the Council retains discretion to specify whether and under what conditions the institution might apply for an initial grant of accreditation or inclusion of a branch campus.

2-3-403. *Procedural Guarantees for Withdrawal by Suspension.* In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

- (a) Opportunity for a review or hearing before ACICS on all material issues in controversy.
- (b) Written prior notice of the proceedings, the charges levied, and the standards by which the institution/campus ultimately is to be judged.
- (c) A decision on the record alone and a statement of reasons for the ultimate decision.
- (d) A right of appeal as provided in Section 2-3-600.
- (e) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

2-3-500 – COUNCIL REVIEW OR HEARING PROCEDURES

All institutional reviews will be in writing unless the Council exercises its sole discretion to require a hearing in person before the Council. The following procedures will govern reviews to be conducted by and hearings to be held before the Council:

- (a) The institution shall have the right to respond with evidence and facts concerning the areas of noncompliance with which it has been charged, to raise all reasonable questions, and to present evidence in opposition to or extenuation of the charges of noncompliance. Such written evidence must be submitted by the date prescribed by the Council unless the institution can show that such information was not available before the submission date and that failure to make a timely submission was outside of the institution's control.
- (b) In the event that the Council requires a hearing in person, the acceptance of an in-person hearing must be made by a date determined by the Council, which will not be less than ten (10) days from the date of receipt of the letter of notification of show-cause directive. The acceptance of the in-person hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the acceptance of the hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing. The institution may send one or more representatives, including legal or financial counsel, to present its argument in opposition to or extenuation of the Council action. The Council transcribes all such hearings for its records. A copy of the transcript is available to the institution upon request.

2-3-501. *Institutional Review or Hearing Format.* Institutional reviews conducted by and hearings before the Council resulting from 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 review or hearing panel of at least three commissioners will be designated by the Council to review the written response or hear the presentation of the institution, if applicable. The panel will present its findings and its

recommended action to the full Council, which will make the final decision within the time frames specified in Title II, Chapter 3.

2-3-502. *Financial Reviews or Hearings.* All reviews conducted by or hearings before the Council for financial concerns only will be deliberated or heard by a panel of at least three commissioners, which will include at least one representative of the Financial Review Committee. The panel will present its findings and its recommended action to the full Council, which will make the final decision within the time frames specified in Title II, Chapter 3.

2-3-600 – REVIEW BOARD APPEAL PROCESS

For those institutions that appeal to the Review Board of Appeals a denial action as described in Sections 2-3-301 and 2-3-302 or a suspension action as described in Section 2-3-402, the Council has established procedures designed to provide due process.

2-3-601. *Purpose and Authority of Review Board.* The Review Board of Appeals is a separate, independent appeals body established by the Council for the purpose of hearing appeals by institutions for actions specified in Sections 2-3-301, 2-3-302, and 2-3-402.

2-3-602. *Appointment of Members.* The Review Board of Appeals shall consist of a pool of fifteen (15) persons, all of whom have had experience in accreditation, who are appointed to three-year terms. An appointed person shall not have been a commissioner within one year prior to appointment. The Review Board of Appeals shall consist of at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members, as defined in Appendix A.

A Review Board of Appeals panel of three to seven persons, depending on the scope and complexity of the matter or institution being reviewed, will be designated by the Council from the entire Review Board to hear an appeal from an institution. The Council also will designate one member of the Review Board panel to serve as chair. The selection and actions of the panel are subject to ACICS conflict of interest policies. A Review Board Panel will consist of at least one (1) academic, one administrative, and one public representative as defined in Appendix A.

2-3-603. *Jurisdiction and Authority.* The Review Board of Appeals is empowered to review, upon notice of appeal timely filed, actions specified in Sections 2-3-301, 2-3-302, and 2-3-402. The Review Board panel has the authority to:

- (a) affirm the decision of the Council;
- (b) amend the decision of the Council;
- (c) reverse the decision of the Council; or
- (d) remand the case to the Council with recommendations for further consideration.

The Review Board panel may amend or reverse the decision of the Council or remand the case to the Council for further consideration only if it finds the decision to be one of the following:

- (a) arbitrary, capricious, or otherwise in substantial disregard of the *Accreditation Criteria*; or
- (b) not supported by substantial evidence in the record on which the Council took the negative action.

The Review Board panel cannot amend or reverse the decision of the Council or remand the decision based on argument by the appellant that the Council action was disproportionate to the violations cited. The Review Board panel is further limited in that it has no jurisdiction or authority concerning the reasonableness of the *Accreditation Criteria*.

A determination by the Review Board panel to affirm the Council's decision is effective immediately upon the Review Board panel's action. A determination by the Review Board panel to amend, reverse, or remand the

Council's decision will be referred to the Council for implementation and further action.

Except as noted below, Review Board panels will not consider any evidence that was not in the record before the Council. Documents reviewed by or available to evaluation teams are not considered to be part of the record unless they are appended to the team report or the institution submits them to the Council as part of the institution's response to the evaluation team report.

An exception to the policy on evidence will be made where a final adverse action is based solely on the failure of an institution to comply with the standards of financial stability. In that case, the institution on one occasion may seek review of significant financial information that was unavailable to the institution prior to the determination of the adverse action and that bears materially on the financial deficiencies identified by the Council. The Financial Review Committee will determine if the new financial information submitted by the institution is significant and material. If these criteria are met, the Financial Review Committee will provide a report of its review to the Council, which then will reconsider its adverse action in light of the new information. If the Council reaffirms the adverse action, the Financial Review Committee report and the result of the Council's recommendation will become part of the record under review before the Review Board.

The panel acts on behalf of the entire Review Board. Therefore, a decision of a Review Board panel is final and will not be considered further by the full Review Board. In cases remanded to the Council for reconsideration, the Review Board panel will identify specific issues that the Council must address. With respect to a Review Board panel decision that is implemented by or remanded to the Council, the Council will act in a manner consistent with the Review Board panel's decisions or instructions.

2-3-604. *Request for Appeal.* To exercise its right of appeal, the institution must file a request for a hearing before the Review Board of Appeals and submit the appropriate fee within a time frame determined by the Council, normally not more than 10 business days from date of receipt of notification of the denial or suspension action. 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 and the appropriate fee, pursuant to the ACICS Schedule of Fees, the Council will notify the institution of procedures to follow in preparing for it.

2-3-605. *Hearing of Appeal.* The hearing will be held at a time and place designated by the chair of the Review Board panel. Three members will constitute a quorum.

If the appealing institution intends to submit a written appeals brief or statement of points, it must be received by the Review Board panel and the Council at least 15 business days prior to the hearing date. The Council's reply brief must be received by the panel and the appealing institution at least seven business days prior to the hearing. The Review Board panel chair will preside at the hearing and will rule on all procedural matters. There will be no right to cross-examine the opposing party or its representatives.

The Council transcribes all Review Board hearings for its own records. A copy of the transcript is available to the institution upon request.

The hearing shall be as informal as may be reasonable and appropriate under the circumstances. Both the Council and the institution may appear by or with counsel or other representative. The institution may waive a personal appearance, in which case the matter will be handled solely on briefs.

The chair of the Review Board panel may promulgate such additional rules of procedure for the scheduling and conduct of hearings as are consistent with these procedures.

2-3-606. *Decision of the Review Board.* Every decision must have the concurrence of the majority of the Review Board panel. Within a reasonable time after the conclusion of the hearing, the hearing panel shall issue in writing its decision with a statement of its reasons and recommendation, if any, to the Council. The decision will indicate

those members of the Review Board panel who concur with the decision. Dissenting opinions may be filed. The majority decision with dissenting opinions, if any, will be furnished to the institution.

2-3-607. Council Receipt of Review Board Decisions. Decisions by the Review Board panel are transmitted to the Council for disposition and publication.

If the Review Board panel affirms the prior decision of the Council, there is no further remedy available within these procedures. The Council's decision is final, and immediate publication is automatic. If the Review Board panel remands the matter, the case shall be deemed to be finally disposed of when the Council takes final action on remand.

2-3-700 – COMPLAINTS AND ADVERSE INFORMATION

Procedurally apart from Council actions heretofore described and explained, ACICS receives and is obligated to investigate legitimate complaints about an institution from any source, that in any way pertain to ACICS criteria.

Also, ACICS periodically receives and may investigate information from federal or state agencies or other accrediting agencies, or through public media sources, which may indicate possible criteria violations. Adverse information may include, but is not limited to, low completion rates, low placement rates, high default rates, tuition refund problems, negative audits or program reviews, and governmental agency investigations.

When the staff of ACICS, with delegated authority to do so, determines that a complaint or adverse information warrants investigation, it will notify the chief executive officer of the institution in writing about the complaint or adverse information, and a copy of the information will be provided. The institution is requested to submit to the Council office its version of the conditions or circumstances which led to the complaint or adverse information. The complainant also will be informed in writing that the institution has been contacted and has been requested to provide information. Any governmental agency providing adverse information to the Council may be informed at the discretion of the Council of the action taken on the adverse information.

The role of the Council in resolving complaints and investigating adverse information is to determine whether the institution is out of compliance with one or more accrediting standards to which the complaint is addressed or to which the adverse information applies. After such determination, ACICS may then do one of the following:

- (a) dismiss the complaint or terminate further investigation of the adverse information;
- (b) postpone a final action on the complaint or adverse information if there is evidence that the institution is making progress to rectify the situation or if more investigation is necessary; or
- (c) notify the institution that, on the basis of information available, ACICS has determined that the institution is failing to comply with the *Accreditation Criteria* and that the institution is:
 - (i) issued a compliance warning
 - (ii) directed to show cause why its accreditation should not be suspended, revoked, or otherwise conditioned;
 - (iii) directed to submit a report to ACICS detailing plans for rectifying the area(s) of noncompliance; or
 - (iv) directed to undergo a special on-site evaluation.

The Council will inform the complainant of the determination by the Council and the disposition of the complaint.

2-3-800 – SPECIAL AND FACT VISITS

The Council reserves the right to initiate special on-site evaluation visits to or request specific reports from an institution at any time, both of which are to be completed under conditions and within a time frame determined by

ACICS. Refusal of an institution to respond to or cooperate with such requests shall be grounds for suspension of its grant of accreditation.

At any time ACICS has substantive evidence or information that an institution is in jeopardy of having its eligibility status with a federal or state agency or its accreditation status with another accrediting agency conditioned, ACICS may direct a special on-site evaluation visit to that institution. The purpose of the visit will be to ensure that the students in the institution are not being harmed educationally because of the institution's alleged noncompliance with federal or state statutes or regulations or another accrediting agency's standards and criteria.

The Council also may direct a Fast Assessment and Compliance Team (FACT) visit to investigate and report on alleged improper practices at ACICS institutions.

The Council retains discretion to determine the size and composition of special and FACT teams and the length and breadth of the evaluation. In making these decisions, the Council will consider the issues and factors that prompted the visit, the size of the institution, and the nature of the institution's offerings.

2-3-900 – DEBARMENT

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-401, from being an owner, senior administrator, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior; was debarred by a government agency or an accrediting agency; or was an owner, senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

The Council will notify the person(s) or entity whom it intends to bar as the result of denial or suspension action within four months following the loss of the institution's accreditation. It will notify the person(s) or entity whom it intends to bar as the result of the closing of an institution within a reasonable period of time following the closure. In each case, the Council will forward an intent to bar notice by both electronic and certified mail to the last institutional mailing address known to the Council, unless the Council has received updated mailing information following the institution's closure or loss of accreditation. Those individuals or entities will be considered notified when the Council has forwarded the intent to bar notice in accordance with these procedures.

The intent to bar notice will inform the person(s) or entity that they are entitled to present information and materials in writing to appeal the intent to bar at the next scheduled meeting of the Council. The notice will stipulate that if they intend to appeal the intent to bar, the person(s) or entity must inform the Council office in writing within ten business days of receipt of the notice as to whether they will appeal the intent to bar in writing or in person, and an in-person hearing is subject to such fees as contained in the ACICS Schedule of Fees. The Council's decision is final if the person or entity elects not to appeal within ten business days of the Council notification.

A debarment order may be issued by the Council as a result of its consideration of the facts presented in the appeal. The Council's decision is final and will be sent to the person(s) or entity by electronic and certified mail following their appeal before the Council.

The Council retains final discretion to establish the terms and length of the debarment. The length of debarment will be for a period of at least three years; however, it may vary depending on the circumstances that led to the debarment decision. Individual circumstances may justify a longer period of debarment.

Chapter 1 General Standards Applicable to All Institutions

INTRODUCTION

This section of the *Accreditation Criteria* comprises the most heavily weighted part of the accrediting process. Chapter 1 states and explains the minimum operational and educational practices expected of all institutions, whatever methodology and mode of educational delivery is used and wherever the institution provides educational activities. Inasmuch as these are minimum expectations, extreme deviation from them is not permitted. The Council, while encouraging innovation at institutions and attempting to be somewhat flexible in its interpretation of these standards, does not grant waivers on criteria pertaining to good educational practice.

Chapters 2-6 contain additional criteria which are applicable to institutions offering nondegree programs and programs culminating in occupational associate's, academic associate's, bachelor's, and master's degrees. The Council recognizes that some requirements of these standards may not be appropriate for entities, and it may waive specific standards on a case-by-case basis.

3-1-100 – MISSION: PURPOSE AND OBJECTIVES

Every institution must have a mission which is its specific purpose for existing. The mission must include a mission statement and a set of objectives which together accomplish the purpose of the institution. The objectives should be devoted substantially to career-related education and should be reasonable for the program of instruction, mode of delivery, and facilities of the institution.

Institutions may exhibit a variety of missions, ranging from those which have a singleness of purpose to those which are multi-purpose.

3-1-101. *Disclosure.* The mission statement of the institution, its purpose, and its supporting objectives must be stated in the catalog and in other publications readily available to the public. The mission statement must be expressed in terms readily understandable by a prospective student, parents, the public, and other educational institutions.

3-1-102. *Implementation.* The institution is measured both in terms of its stated purpose and in terms of its conscientious endeavor to fulfill this purpose. The faculty, financial resources, physical plant, administration, management, and educational activities shall be appropriate and committed to successful implementation of the stated mission of the institution.

3-1-110 – CAMPUS EFFECTIVENESS

An important indication of the overall effectiveness of an ACICS-accredited institution is the degree to which it meets the mission, objectives, and educational goals it has identified. Each ACICS-accredited main and branch campus shall develop and implement a Campus Effectiveness Plan (CEP) that is consistent with its mission and objectives. The CEP shall identify how a campus plans to assess and continuously improve its overall educational operations and how it plans to meet the educational and occupational objectives of its programs, taking into consideration its review of all critical organizational functions such as admissions, recruitment, financial aid, and student services.

For the Campus Effectiveness Plan, the following elements, at a minimum, shall be evaluated and reported for achievement of outcomes, at both the campus and program levels:

- I. retention rates;

2. placement rates;
3. graduation rates;
4. the level of student satisfaction;
5. the level of graduate satisfaction;
6. the level of employer satisfaction; and
7. student learning outcomes.

3-1-111. *Development of the Campus Effectiveness Plan.* The effectiveness plan for each campus shall be described in a written CEP document that complies with Appendix K, Requirements and Guidelines for the Campus Effectiveness Plan (CEP).

3-1-112. *Implementation and Monitoring of the Campus Effectiveness Plan.* Each campus shall establish a process for developing, reviewing, and monitoring the Campus Effectiveness Plan (CEP). Each campus shall document that progress reports, completed at least biannually, related to completion of activities and changes in data and information for each of the elements identified in the CEP are prepared.

3-1-113. *Evaluation of the Campus Effectiveness Plan.* Each campus shall evaluate the CEP, its goals, and the effectiveness of activities completed at least annually. The annual evaluation will involve comparison of outcomes with baseline rates and goals for each of the elements measured after completion of planned activities. Data for historical outcomes shall be maintained and included in the report to provide a basis for evaluating the achievement of goals for the various elements of operations and campus and program effectiveness over time.

3-1-200 – ORGANIZATION

Each institution should have an organizational structure designed to promote among all staff and faculty a spirit of understanding, cooperation, and responsibility. Performance standards and monitoring controls need to be employed to insure adequate administrative functioning. The annual budget expenditures should be adequate to properly carry out the stated educational objectives of the institution.

3-1-201. *Disclosure.* The governance, control, and corporate organization of the institution shall be stated in appropriate publications, including the catalog, together with the names of the trustees, directors, administrators, and officers.

3-1-202. *Institutional Integrity and Capability.* The integrity and capability of an institution is manifested by the professional competence, experience, personal responsibility, and ethical practices demonstrated by all individuals comprising the ownership, control, or management.

An institution must assume full responsibility for the actions, statements, and conduct of its representatives and must, therefore, select each of them with the utmost care, provide them with adequate training, and arrange for constant and proper supervision and evaluation of their work. The Council considers the following to be important:

- (a) Emphasis shall be placed upon the efficiency and effectiveness of the overall administration of the institution. Attention shall be given to educational activities, admissions, student financial aid, financial operations, plant and equipment, student services, and compliance with applicable local, state, and federal laws. The degree of institutional compliance with the criteria in these areas is a measure of the administrative capability of the chief on-site administrator of a main campus or branch campus.
- (b) The institution must maintain written evidence that faculty and staff members clearly understand their duties and responsibilities, know the person to whom they report, and understand the standards by which the success of their work is measured. A copy of the document describing these terms and conditions shall be given to the faculty and staff member and a copy maintained by the institution. The administration

must maintain documentation of the evaluation of the faculty and staff.

- (c) In the administrative organization of the institution, the professional integrity of the faculty and staff shall be respected. Administrative decisions shall not inhibit the academic freedom of the faculty. The institution shall adopt a policy assuring academic freedom and communicate the policy to all faculty.
- (d) An institution shall establish, publish, and implement appropriate grievance policies and procedures for considering complaints received from students, employees, and other interested parties. The grievance procedure for students shall be published in the institutional catalog or student handbook and shall include the name and address of ACICS.

3-1-203. *Data Integrity.* All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness.

3-1-204. *Financial Stability.* The financial well-being of an institution requires constant oversight by competent managers.

The institution shall have adequate revenues and assets to meet its responsibilities, to ensure continuity of service, and to accomplish its mission. Budgetary practices should reflect a balanced application of resources to operations; the amount of expenses and debt must not burden the educational objectives of the institution; the proportion of the budget allocated to instructional programs must be adequate; and the financial profile of the institution must support the intent of its objectives.

3-1-300 – ADMINISTRATION

Each institution must coordinate its administrative functions to best serve its educational mission. All staff should be well trained to carry out administrative functions. Detailed recordkeeping enhances the management of the institution.

3-1-301. *Management.* Each institution shall have a chief executive officer. Moreover, each institution also shall have a qualified on-site administrator at the main campus and at all branches. This person must be made known to ACICS and shall be responsible for the implementation of the stated mission as determined by the institution's governing body. The staff continuously shall evaluate the programs of study, student activity program, guidance services, financial aid services, instructional procedures and resources, and other aspects of the educational program of the institution. The chief executive officer shall seek to improve the educational program as a result of such evaluation. A current copy of the *Accreditation Criteria* shall be maintained by each main and branch location and shall be available to faculty and staff.

3-1-302. *Evidence of Degrees.* Institutions listing degrees of staff members in the catalog shall have on file appropriate evidence of the degrees. Copies of either transcripts or diplomas are acceptable.

3-1-303. *Records.* Careful recordkeeping is crucial to the smooth day-to-day operation of an institution. The data from these records are important to the institution for future planning, to students for informational purposes, and to evaluation teams during school visits. All such records should be maintained at each institutional site or shall be available at each site during evaluation visits. The Council expects at least the following:

- (a) Adequate records shall be kept by each institution relative to administrative operations. These include financial aid activities, admissions, curriculum, accreditation and licensure, guidance, instructional resources, supplies and equipment, school plant, faculty and staff, student activities, and student personnel.
- (b) For all students admitted under an ability-to-benefit determination, the institution shall maintain records of the validated test scores, initial and periodic academic and career advising, and any other factors used by the institution to support its admissions determination.
- (c) For institutions admitting students under an ability-to-benefit determination, documentation shall be

maintained to evidence the relationship between test cut-off scores on whatever test the institution uses and successful academic or employment outcomes.

Such records could include such data as admissions rate (acceptances versus rejections), completion rate of those enrolled, general placement rate, or specific career placement rate.

For students tested and enrolled based on a test's validity to predict aptitude, the test score should predict successful completion of the program. Institutions must develop longitudinal data comparing the test cut-off score(s) utilized for acceptance with the eventual success of students.

An institution admitting a high percentage of applicants based on testing and losing a comparably high percentage of those students before completion (even allowing for factors other than ability) may not be using the appropriate test to measure aptitude, or the cut-off score for admission is too low, or both. The use of the minimum cut-off scores determined by the U.S. Department of Education will not, in and of itself, satisfy the requirements of this section.

- (d) For high school graduates or those with high school equivalency, the institution shall have on file evidence that the student has received a high school diploma or its equivalent. A signed statement by the student is acceptable documentation. The student's record also may include personal background information, evidence of other educational experiences (including certificates, diplomas, or degrees earned), or information about the ability of the student to benefit from the education offered, including any aptitude testing information or recommendations from other sources.
- (e) A permanent academic record (transcript) of the student's progress shall be maintained. Compatible with the institution's mission, the transcript shall indicate student accomplishment in terms of clock hours, units of credit, or some other recognized system. The grading system used shall be fully explained on the transcript and must be consistent with that appearing in the institutional catalog.
- (f) All records pertaining to students shall be safely protected. Records shall be stored consistently in a manner that provides protection against misuse, misplacement, damage, destruction, or theft. Acceptable methods of protecting records from theft, fire, water damage, or other possible loss include electronic records management systems and software appropriately fire-rated file cabinets (that can be and are locked when not being used); a central location such as a vault, the entirety of which is protected; and printout records or other hard copies of records protectively stored off the premises.
- (g) Certain records shall be maintained by the institution for a specified period of time. The institution shall adopt and publish a policy on the responsibility and authority of the institution to properly maintain and retain such records. At a minimum, the policy should address the following document retention requirements:
 - (i) Academic records shall be maintained permanently (see Glossary definition of Record, Permanent Academic);
 - (ii) Admissions and advisement records shall be kept for at least five years from graduation or the last date of attendance (see Glossary definition of Record, Admissions and Advisement); and
 - (iii) Financial aid records shall be maintained according to the record retention policies and guidelines established by the funding source (see Glossary definition of Record, Financial Aid).

The institution shall comply with its published policy on records maintenance and retention.

3-1-400 – RELATIONS WITH STUDENTS

Each institution should strive to ensure that its relations with students always reflect the highest ethical standards and conform to all applicable laws and regulations. Each institution also is required to develop a program of student services that is consistent with its stated mission, including services provided for students attending branch campuses and learning sites. Such services should support the educational program and reflect the institution's concern for the welfare of the student.

3-1-410 – ADMISSIONS AND RECRUITMENT

It is up to an institution to establish its own admissions criteria. It is the responsibility of ACICS to ensure that all who are enrolled are accorded equal educational opportunity.

The monitoring of the activities of an institution's employees, vendors, contractors, or agents in the referral, recruiting, evaluation, and admissions processes is the responsibility of the institution. The activities of these individuals must be supervised by the institution. An institution may not delegate these activities to anyone whose economic incentives are to recruit prospects through means that are unethical or subject to public criticism or to admit ill-prepared applicants. The institution may not contract, directly or indirectly, with third parties who are generally unfamiliar with the institution. "Non-employees" are independent contractors who are not considered "employees" under the Internal Revenue Code.

Institutions participating in Title IV programs must be aware of regulations imposed by the U.S. Department of Education as they apply to recruiting practices.

3-1-411. Admissions. The admissions policy shall conform to the institution's mission, shall be publicly stated, and shall be administered as written. The following minimums apply:

- (a) The requirements for students admitted to programs leading to a certificate, diploma, or degree shall include graduation from high school or its equivalent, or demonstration of the student's ability to complete the program under the ability-to-benefit classification as specified under standard 3-1-303(b) and (c), as provided for by governing laws. Foreign transcripts of international students seeking admission must be evaluated by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES) to validate equivalency with graduation from high school and eligibility to enter college or university in the United States.
- (b) It is the responsibility of the institution to maintain student records which reflect the requirements for admission of all students.
- (c) Institutions are not precluded from admitting, under different requirements, students who are beyond the age of compulsory school attendance or who may be otherwise specially circumstanced, such as:
 - (i) having financial sponsorship through contractual arrangements with public or private organizations;
 - (ii) having identifiable needs requiring remedial instruction as a supplement to the regular curricula;
 - (iii) participating in innovative postsecondary programs specially described to ACICS; or
 - (iv) being enrolled in individual courses not leading to an academic credential.

3-1-412. Recruitment. Recruiting shall be ethical and compatible with the educational objectives of the institution. The allocation of an institution's financial resources for purposes of recruitment shall be consistent with the stated mission of the institution. The following minimums apply:

- (a) An institution shall ensure that any person or entity engaged in admissions or recruitment activities on its behalf is communicating current and accurate information regarding courses and programs, student achievement disclosures (see Section 3-1-704), services, tuition, terms, and operating policies. The institution must maintain documentation that demonstrates that it systematically monitors its recruitment activities.
- (b) No prospective student names obtained as a result of a survey, canvass, promise of future employment or income while a student, or other marketing activity by an institution may be used for recruitment purposes unless the name of that institution is clearly identified and purposes of such activity are communicated to the respondent. This does not preclude the use of surveys or other studies to determine the employment needs and the educational desires of the local community.

- (c) An institution shall conform to the laws and regulations of each of the states in which it operates and shall ensure that each of its representatives is properly licensed or registered as required by the laws of that state.
- (d) Representatives of an institution shall use only those titles which accurately reflect their actual duties and responsibilities. Recruitment and enrollment personnel may not be designated as counselors or advisors and may not make final decisions regarding financial aid eligibility, packaging, awarding, and disbursement.
- (e) Referrals are permitted, and the referrer may be paid a fee so long as the referrer provides full disclosure and does not misrepresent the purposes of soliciting a prospective referral and such payments do not violate state or federal laws.
- (f) All recruiters must be supervised by the institution's administration to ensure that their activities are in compliance with all applicable standards.

3-1-413. *Transfer of Credit.* An institution shall evaluate and consider awarding proper academic credit for credits earned only at institutions that are either accredited by agencies recognized by the United States Department of Education or recognized by the respective government as institutions of higher education, for internationally-based institutions. The institution shall establish and adhere to a systematic method for evaluating and awarding academic credit for those courses that satisfy current program course requirements including an evaluation of all foreign transcripts by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES), prior to the evaluation and award. Written policies and procedures must clearly outline the process by which transfer of academic credit is awarded. The institution shall disclose in its catalog its policies on transfer of credit, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and if applicable, a list of institutions with which the institution has established articulation agreements.

In addition, the institution shall disclose in its catalog-the transferability of the credits in the programs that are offered.

3-1-414. *Enrollment Agreements.* All institutions must use an enrollment agreement for each enrolled student which clearly outlines the financial obligations of both the institution and the student. The agreement must outline all program-related tuition and fees as well as the scheduled month and year of expected graduation, and must be signed by the student and the appropriate school representative, and a copy provided to the student.

3-1-420 – STANDARDS OF SATISFACTORY PROGRESS

Each institution shall establish and administer measures of satisfactory academic progress for all students as referenced in Appendix D.

3-1-421. *Compliance.* The institution complies with the requirements of Appendix D.

3-1-422. *Documenting Compliance.* The institution documents compliance with its Satisfactory Academic Progress policy.

3-1-423. *Oversight.* The institution encourages and assists students who are experiencing difficulty in progressing satisfactorily in their programs.

3-1-430 – TUITION AND FEES

3-1-431. *Institutionally Financed Grants, Scholarships and Loans.* The Council recognizes that most accredited institutions offer or administer grants, scholarships and loans for students. Institutions must meet appropriate guidelines for such programs in order to ensure their legitimacy. Participation in ethical institutional grant (see

Appendix E, Guidelines for Institutionally Funded Student Aid), institutional loan, and scholarship programs requires adherence to the following:

- (a) In addition to administering federal or state student aid programs, institutions may offer the following types of student financial aid:
 - (i) grants funded by the institution and awarded to all students within a qualifying category or to all students who demonstrate a need in accordance with published standards;
 - (ii) scholarships funded by the institution or a third-party and administered by the institution to provide aid to students who demonstrate academic achievement in accordance with published standards; and
 - (iii) loans funded by the institution and available equally to all students.
- (b) Institutionally financed or administered grants, scholarships and loans must be described in the current catalog with a description of the criteria for the award, the application procedures and deadlines, and amounts that may be awarded. All information must avoid false, misleading or exaggerated statements.
- (c) Institutionally financed loans may vary in amount depending on the student's need. The terms and conditions for loans, including forbearance and repayment, must be described in the current catalog. All institutionally financed loans must be collected in accordance with sound and aggressive business practices for the collection of student loans. Institutions must counsel students concerning their loan repayment obligations.

3-1-432. Tuition and Charges. Institutions may charge varying amounts of tuition and fees for different programs. All charges should be consistent for similarly circumstanced students enrolling at the same time and in the same programs, however, and detailed financial records should indicate at all times the financial obligation of the student to the institution. The following are minimum expectations:

- (a) The tuition and other charges, including the period for which the student is financially obligated, shall be clearly stated in the catalog of the institution. The existence of any separate or comparable publication containing tuition rates must be referenced specifically in the catalog. The schedule of charges must be uniformly administered to similarly circumstanced students.
- (b) The financial records of the students shall clearly show the charges and dates for the posting of tuition, fees, and other charges; the payments and dates of payment; and the balance after each transaction.
- (c) Announcements of changes in tuition or fees must state the effective date of the change and be uniformly administered.
- (d) Terms of payment may be varied by the institution so long as the tuition charges are uniformly administered.

3-1-433. Refund Policy. The institution must have a fair and equitable refund policy that is applicable to all students and that is published in the institution's catalog. Specific federal or state policies may apply.

3-1-434. Administration of Student Financial Aid. Participation in state or federal student financial aid programs requires serious administrative responsibility. The Council expects all institutions participating in such programs to be knowledgeable of and in compliance with applicable laws and regulations. The following requirements govern how such activities are evaluated by ACICS:

- (a) An institution participating in student financial aid programs shall designate at least one competent person at the site to administer student financial aid. The extent of this activity and the personnel needed shall be governed by the size and classification of the institution. The person who determines the amount of student awards cannot be responsible for disbursing those awards.
- (b) The person or persons assigned to administer student financial aid programs must in all cases be a part of the administration. Administrative personnel involved in student recruitment as their major activity shall not have the final decision-making authority in the approval or awarding of student financial aid.
- (c) There shall be professional awareness on the part of the financial aid administrator as shown by mem-

bership and participation in state, regional, or national financial aid associations and by other educational activities designed to keep the administrator up to date on procedures and changes in the field.

3-1-435. Cash Discounts. Any institution providing discounts for cash received in advance of the normal payment schedule must have a written policy. That policy must be provided in writing to all student applicants prior to enrollment.

The institution must demonstrate that the policy:

- (a) is available to all students at the institution; and
- (b) bases the size of the discount on the financial benefit the institution receives from the payment of cash earlier than otherwise would be required under the institution's normal tuition payment schedule or applicable retail installment contract.

3-1-440 – STUDENT SERVICES

3-1-441. Counseling and Guidance. Each institution shall designate at least one person on staff experienced in counseling students on personal or academic problems and employment opportunities. The extent of such activity, and the personnel assigned to it, shall be determined by the size, classification, and admissions standards of the institution, the characteristics and location of students, and the means of communication with them. Orientation activities shall assist new students in adapting to the institution. The following are minimum expectations:

- (a) A system of educational, occupational, and personal advising shall be available to students and shall be provided on a periodic basis to ability-to-benefit students enrolled pursuant to Section 3-1-303(b).
- (b) Institutions shall emphasize retention and program completion for all students through activities that take into account their academic and socioeconomic characteristics.
- (c) Institutions shall provide employment assistance and document activity. An institution shall not guarantee employment or the starting salary of its graduates. Follow-up studies on graduates and employer satisfaction shall be conducted by all institutions at specific measuring points following placement of the graduate. All institutions that use placement percentages or salary projections as part of their recruiting activities shall maintain data on all graduates, including the percentage receiving jobs and the percentage receiving jobs in the career field for which they were trained. Institutions also should keep data on students who do not graduate but who become employed on their own or with the institution's assistance.

An institution is encouraged to provide placement assistance, when requested, to graduates of other ACICS-accredited institutions who are relocating to a new community.
- (d) Institutions shall document that students are counseled concerning their student loan repayment obligations.

3-1-442. Extracurricular Activities. Institutions which sponsor or conduct programs of extracurricular activities shall base such programs on well-defined purposes. These programs shall be designed primarily to serve the educational needs of the students, and the institution shall provide guidance and supervision for them.

3-1-500 – EDUCATIONAL ACTIVITIES

The major index of an institution's quality is the effectiveness of its educational program. The educational program must be consistent with the stated mission, be adequate in breadth and context to achieve it, and produce measurable results. Its educational activities, whether residential or otherwise and whether group or individually oriented, shall include definable instruction, interaction, and evaluation. A second index of institutional quality is the resources available to instructors and students.

The third index of an institution's quality is the competence of its faculty. The effectiveness of any institution depends upon contemporary teaching strategies and practices and upon the knowledge, ability, and commitment

of its faculty. The selection, orientation, guidance, stimulation, and evaluation of the teaching staff are some of the most significant responsibilities of the administration. The faculty should actively participate in developing the total educational program of the institution.

3-1-501. Faculty Involvement in Academic Governance. The faculty shall have a clear responsibility, distinct from that of developing institutional policy, to participate in administering and implementing policy, especially as it pertains to academic affairs. The institution shall adopt and publish a policy on the responsibility and authority of faculty in matters of academic governance. At a minimum, the policy should address the role of faculty in:

- (a) the development of the educational program of the institution;
- (b) the selection of course materials, instructional equipment, and other educational resources;
- (c) systematic evaluation and revision of the curriculum;
- (d) assessment of student learning outcomes; and
- (e) planning for institutional effectiveness.

3-1-502. Programs Requiring Certification or Licensure. For institutions offering programs in which state certification, licensing, or registration is mandatory in order to become employed in a specific career field, curricula must contain the necessary course work to afford students the opportunity to obtain the minimum skills and competencies in order to become certified, licensed, or registered in that career field.

3-1-503. Specialized/Programmatically Accredited Programs. Where accreditation of a program by a specialized or programmatic accreditor is required for students to obtain entry-level employment in the state where the institution is licensed or otherwise approved, the institution must obtain such accreditation in a timely manner. The institution must provide and document notification to students as to:

- (a) which programs hold specialized or programmatic accreditation;
- (b) whether successful completion of a program qualifies a student to receive, apply to take, or take licensure exams in the state where the institution is located. For online programs, this information must be provided for all states from which the institution enrolls students; and
- (c) any other requirements that are generally required for employment.

The institution shall assess the curriculum and/or the need for specialized accreditation and update it as needed to reflect current requirements for employment.

3-1-504. Education or Study Abroad Activities. An institution may enter into formal education or study abroad relationships with eligible institutions outside its home country in accordance with the requirements outlined in Appendix J.

3-1-505. Direct Assessment Competency-based Programs. Competency-based programs utilize direct assessment of student learning by faculty and other experts in the field serving under the supervision of the institution for academic progression in lieu of clock or credit hours. The institution must demonstrate that it has utilized a robust and structured process for identifying the required knowledge, skills and professional behavior (“soft skills”) to be considered “competent” in the field. The syllabus for each course must clearly define the competency standards and how the direct assessment of student learning will be conducted.

The institution must demonstrate to the Council its methodology for determining the equivalent number of credit hours or clock hours required for the program.

The institution is required to maintain, as part of the permanent academic record, student work submitted for direct assessment along with the institution’s assessment of student achievement.

Specific standards and requirements are described in Appendix H Principles and Requirements for Nontraditional Education, Section 1.

3-1-510 – PROGRAM ADMINISTRATION, PLANNING, DEVELOPMENT, AND EVALUATION

3-1-511. *Program Administration.* The administration of the academic programs shall be assigned to individuals whose academic or experiential qualifications are related to the programs of study. The amount of time devoted to the administration of the program(s) must be commensurate with the size and scope of the institution and its program offerings.

Within the administrative structure of the institution, program administrators or department heads shall have authority and responsibility for the development and administration of the programs and have adequate time and resources to fulfill these responsibilities.

3-1-512. *Program Planning.* Educational activities shall be consistent with the institution's mission and objectives. The credibility and integrity of an institution shall be reflected by the manner in which its mission and objectives correlate with the educational opportunities made available to students.

The Council recognizes the legitimacy of various modes of educational delivery. An institution using various modes of delivery should demonstrate overall effectiveness and quality consistent with the criteria (see Glossary definitions of Distance Learning, Independent Study, and Self-paced Instruction; see also Appendix H, Principles and Guidelines for Nontraditional Education). The following standards apply:

- (a) The formation of policies and design of educational programs should involve students, graduates, administrators, faculty, and other interested parties such as advisory committees. This practice also should serve as an evaluation process to determine effectiveness and relevance when the institution relies upon curricula, courses, courseware, or coursework that is designed, leased, or owned by another entity or provided by or through a network of entities.
- (b) Flexibility in organization and administration shall be provided to serve varying groups and situations. Provisions shall be made for individual differences among students in the learning applications, learning environments, and modes of instructional delivery available to students.
- (c) The use of community resources shall be varied in each program and shall be utilized to enhance student enrichment and potential career opportunities. (See Glossary definition of Community Resources.)

3-1-513. *Program Development.* The educational programs shall evidence a well-organized sequence of appropriate subjects leading to an occupational objective, an academic credential, or both. The following apply:

- (a) The curricula shall be published in the institution's catalog and shall state objectives specific to each curriculum. Additionally, there shall be a detailed syllabus on file for each course in each curriculum that is made available to each student enrolled in the class. For independent study courses, institutions are required to develop a learning contract signed by the student and institution that outlines the course objectives and procedures unique to this form of instruction. For externships, institutions are required to develop a written and mutually signed agreement that outlines the arrangement between the institution and the site, including specific learning objectives, course requirements, and evaluation criteria. The Council's expectations for detailed syllabi, independent study, and externships are outlined in the Glossary.
- (b) The courses offered shall be available when needed by the student in the normal pursuit of a program of study. Prerequisites must be indicated. The prerequisite system must assure proper qualifications of students in any given class and provide an increasing level of difficulty as the student progresses.

Institutions may record student progress in clock hours or credit hours as defined in the Glossary. When appropriate, special consideration should be given to remediation and English as a Second Language programs. (For additional information, see Appendix F, Requirements for English as a Second Language Programs.)

3-1-514. *Program Evaluation.* The faculty shall participate in a systematic process of continuous curriculum evaluation and revision. Institutions are encouraged to consider curriculum changes designed to serve students'

needs that may be determined by community surveys or other fact-finding procedures relating to educational or employer needs.

3-1-515. *Specialized Accreditation.* If a program is accredited by a specialized accreditor recognized by the U.S. Department of Education, the Council for Higher Education Accreditation, or, for foreign institutions, the government or appropriately recognized organization providing specialized accreditation, the Chief Executive Officer of the institution shall attest to ACICS and provide documentation that it is in compliance with the standards of the specialized accreditor.

3-1-516. *Course and Program Measurement.* The Council recognizes that institutions must provide for their students a learning environment in which achievement is encouraged. It further recognizes the legitimacy of both traditional (e.g., lecture/laboratory/externship) and nontraditional (e.g., distance education or independent study) educational delivery methods. A framework for transfer of credit and consistent application of academic credit awards should apply to all of these varied forms of educational delivery.

Institutions, therefore, must demonstrate in written policies and procedures for determining credit hours a knowledge of appropriate academic course and program measurement and correct application of the measurement.

- (a) Credit in traditionally delivered programs measured in credit hours must be calculated based on one of the following attribution formulas:
 - (i) One quarter credit hour equals, at a minimum, 10 classroom hours of lecture, 20 hours of laboratory, and 30 hours of externship. The formula for calculating the number of quarter credit hours for each course is $(\text{hours of lecture}/10) + (\text{hours of lab}/20) + (\text{hours of externship}/30)$; or
 - (ii) One semester credit hour equals, at a minimum, 15 classroom hours of lecture, 30 hours of laboratory, and 45 hours of externship. The formula for calculating the number of semester credit hours for each course is $(\text{hours of lecture}/15) + (\text{hours of lab}/30) + (\text{hours of externship}/45)$.

The syllabus for each course must provide appropriate content and out-of-class learning activities to support the academic credit awarded for the course. Many courses are a combination of lecture, lab, and practicum. Therefore, the institution should be very careful in allocating the number of hours of each in a particular course.

A “clock (contact) hour” includes a minimum instructional time of 50 minutes of supervised or directed instruction and appropriate break(s). Therefore, when calculating conversions from clock to credit hours or allocating credit for courses, institutions must take great care to ensure that scheduled breaks are educationally appropriate. Long periods of instruction with unusually short or no breaks are not acceptable. The institution has the burden of convincing the Council that the breaks are sufficiently long and frequent for the program being taught. Thus, it is rare for an institution to be able to divide by 50 in calculating the credit-hour equivalent of contact hours; usually, the denominator should be 60 or something between 50 and 60.

- (b) Credit award rationales for nontraditional delivery of courses or programs (e.g., distance education or independent study) generally do not use the above lecture/laboratory/practicum formulas for credit calculation. The rationale used must be submitted to the Council for pre-approval of the credit calculation. As a part of the approval application, an institution must demonstrate that the clock or credit hours awarded are appropriate for the degrees and credentials offered using a thoroughly developed rationale. The institution may accomplish this by demonstrating that students completing these programs or courses have acquired equivalent levels of knowledge, skills, or competencies to those acquired in traditional formats.

Courses offered in nontraditional formats must be structured to ensure that students have sufficient opportunity for preparation, reflection, and analysis concerning learned subject matter. Institutions should be aware that federal law requires a minimum number of weeks per academic year for Title IV eligibility purposes. The U.S. Department of Education uses eligibility criteria and definitions for Title IV disbursements that may be different from those in the *Accreditation Criteria*.

- (c) Institutions may award academic credit to students who demonstrate competency in a subject area based on their academic, occupational, or personal experiences. The following expectations apply:
- (i) Institutions shall establish and adhere to a systematic method for evaluating and awarding academic credit for those experiences (e.g., experiential learning, advanced academic standing, credit by examination) that satisfy current program course requirements.
 - (ii) Institutions must maintain documentation to support that credit hours awarded are appropriate based on the assessment of the knowledge, skills, or competencies acquired.

3-1-517. *Course Scheduling.* Courses must be scheduled in such a way as to be educationally appropriate for the academic background of the students served, the type of the coursework involved, and the method of educational delivery. The Council will review the number of minutes of instruction provided, the appropriateness of the length of the breaks between classes, the number of classroom hours per week, the expectation of outside preparation, and the educational needs of the students.

3-1-520 – CREDENTIALS CONFERRED

3-1-521. *Conferring of Credentials.* The conferring of certificates, diplomas, or degrees by an institution shall be consistent with its mission and objectives and in compliance with applicable state laws.

3-1-530 – INSTRUCTION

3-1-531. *Instructional Tools.* Institutions shall:

- (a) provide appropriate facilities, instructional equipment, resources, support for modes of instructional delivery, and personnel;
- (b) ensure academic freedom and other conditions favorable for effective classroom instruction;
- (c) ensure that the quantity and type of instructional material and equipment is proportionate to the size of the institution and the nature of the program; and
- (d) comply with applicable copyright laws in the use of instructional materials.

3-1-532. *Instructional Components.* Required instructional components shall include the following:

- (a) systematic planning;
- (b) well-defined instructional objectives;
- (c) the selection and use of appropriate learning materials;
- (d) appropriate modes of instructional delivery;
- (e) the use of appropriate assessment strategies; and
- (f) the use of appropriate experiences.

3-1-540 – FACULTY

3-1-541. *Faculty Preparation.* Preparation of faculty members shall be academically and experientially appropriate to the subject matter they teach. Faculty members shall be competent to teach the subject matter offered and shall have reasonable latitude in their choice of teaching methods.

U.S. based institutions must provide evidence that all faculty members are graduates of institutions accredited by agencies recognized by the United States Department of Education. Credentials of faculty who are graduates from institutions outside the United States must be evaluated by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES) to determine the equivalency of the credentials awarded by institutions in the United States.

Internationally based institutions must provide evidence that all faculty members are graduates of institutions recognized by their respective governments as institutions of higher education or be evaluated by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES) to determine the equivalency of the credentials awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English.

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.

3-1-543. *Faculty Development.* Institutions are required to establish faculty development plans including both in-service and professional growth activities to enhance faculty expertise. There shall be documented evidence on an annual basis of these development plans and their implementation. For those faculty who are trained in teaching methodology on the postsecondary level and who possess limited related outside employment, the plan should concentrate on content update, e.g., new software, equipment, techniques, etc. Institutions are responsible for demonstrating that these plans are appropriate given each faculty members' training, education, and related work experience and that they provide the proper mix of in-service training and professional growth based on the academic and experiential background of the faculty. (See Glossary definitions of In-Service Training, Professional Growth, and Faculty Development.)

3-1-544. *Faculty Meetings.* Regularly scheduled faculty meetings or department meetings, with participation by full-time and part-time faculty, shall be held. Discussions and attendance shall be recorded.

3-1-600 – EDUCATIONAL FACILITIES

Each institution must provide an environment that is conducive to good instruction and learning and that supports the educational programs offered by the institution. The adequacy of the environment is assessed against the demands made upon it by the curricula, faculty, and students.

3-1-601. *Plant and Equipment.* The buildings, classrooms, equipment, furniture, grounds, instructional tools, support systems, instructional facilities, machinery, and other physical requirements of the educational program shall be appropriate and shall contribute to the achievement of the institution's objectives. Equipment, instructional tools, and machinery must be properly installed and maintained.

3-1-602. *Code Requirements.* The plant shall meet the general tests of safety, usefulness, cleanliness, maintenance, health, lighting, and compliance with any local or state laws governing physical facilities, particularly with respect to fire, safety, and sanitation.

3-1-700 – PUBLICATIONS

It is important for institutions to recognize the value of "truth in advertising" when promoting their operations. Publications must be prepared and presented in a professional manner to reflect favorably upon the institution. Information published must be accurate and factual and reflect the current status of the institution. Only the Council can accept or reject an institution's catalog, and a final decision will not be made based on a draft.

3-1-701. *Catalog.* Each institution shall publish and provide to each enrolled student a catalog which complies with Appendix C, Institutional Publications Requirements.

3-1-702. *Multiple-School Catalog.* All institutions utilizing a common catalog must be of common ownership. Photographs of the physical facilities of any of the institutions must be captioned to identify the particular institution or campus depicted. The faculty and staff of each institution and the members of the general administration exercising supervisory responsibility for the group of institutions must be clearly identified with respect to each institution and the overall administration. Any information contained in the catalog that is not common to all institutions in the group should be presented in such a manner that no confusion, misunderstanding, or misrepresentation is possible. (For further information, see Appendix C.)

3-1-703. *Advertising.* Literature used by an institution must be presented in such a manner as to be factual with respect to services offered or benefits promised. An English translation for advertising that is in a language other than English must be available. (For further information, see Appendix C.)

If an institution publicly discloses incorrect or misleading information about its accredited status, the contents of an evaluation team report, or accreditation actions with respect to the institution, the institution must make a public disclosure of correction through the same media or means.

3-1-704. *Performance Information.* Each campus shall routinely provide reliable information to the public on its performance, including student achievement information, that includes, at a minimum, retention, placement, and licensure examination pass rates (where applicable). The information provided shall be for the entire campus and for each program as reported to ACICS in its most recent Campus Accountability Report.

3-1-800 – LIBRARY RESOURCES AND SERVICES

The adequate provision of library resources and information services, appropriate to the academic level and scope of an institution's programs, is essential to teaching and learning. It is incumbent upon all member institutions to assess the level of library resources needed in relation to their programs and to provide a range of support to meet these needs. The size of collections and the budget allowed for library resources and services do not ensure adequacy. The quality, relevance, accessibility, availability, and provision of support services ultimately will determine the adequacy of an institution's efforts. In assessing library resources and services, ACICS requires that an institution, at a minimum, shall:

- (a) develop an adequate core of library resources to support academic success and to meet instruction and research needs as appropriate;
- (b) ensure up-to-date means to access these resources;
- (c) develop a continuous assessment strategy for library resources and information services that includes staff and faculty;
- (d) provide adequate staff to support assessment, library development, collection, organization, and accessibility;
- (e) ensure that library services are provided to all learners, including those at nonmain campuses and those online;
- (f) provide training and encouragement for students and faculty to utilize library resources as an integral part of the learning process and as lifelong learners; and
- (g) those campuses that have a residential component, must provide students a physical space on site or within close proximity to the institution in order to allow for access to library resources and services.

TITLE III EVALUATION STANDARDS

Chapter 2 Standards for Nondegree Programs

INTRODUCTION

In addition to the general standards in Chapter 1, which apply to all institutions, the following standards apply specifically to nondegree programs.

3-2-100 – FACULTY

Teaching hours, assignments, and schedules will vary from field to field and from institution to institution but should in all cases allow time for adequate preparation and professional development. The institution shall devise a plan for the efficient use of faculty competence and time, including student-teacher ratios, number of teacher preparations, and number of teaching hours. Reasonableness may be defined by, but is not restricted to, the following expectations.

3-2-101. *Teaching Load.* Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

3-2-102. *Field Preparation.* Assignments requiring more than three preparations in different fields (e.g., allied health, business, criminal justice) shall not be given to an instructor at any given time.

3-2-103. *Subject Preparation.* Not more than five preparations in different subjects within the same field (e.g., Accounting I, Accounting II, Keyboarding I, Business Mathematics, Business Law) shall be assigned to an instructor during one academic term.

3-2-104. *Assignments.* The requirements for full- and part-time faculty members teaching in the referenced subject areas are as follows:

- (a) A bachelor's degree and appropriate coursework in the assigned subject are required for faculty members teaching applied general education and other academic courses. Instructors teaching general education shall hold a minimum of a master's degree. Instructors shall have a minimum of 18 semester or equivalent hours of coursework in their teaching discipline. At internationally based institutions, transcripts in languages other than English for general education instructors must be translated into English.
- (b) A bachelor's degree is required for faculty members teaching business and business administration courses. If the bachelor's degree is not in the assigned teaching field, at least two years of related work experience or evidence of specialized training or competency in the assigned teaching field is required. The burden is on the institution to demonstrate and justify the qualifications of the faculty to teach their assigned courses.
- (c) Faculty members teaching courses not referenced above must demonstrate competency in the assigned teaching field, such as academic or vocational training and credentials, related work experience, licensure, or certification. The burden is on the institution to demonstrate and justify the qualifications of the faculty to teach their assigned courses.

3-2-105. *Stability.* There shall be an adequate core of full- and/or part-time faculty to ensure sound direction and

continuity of development for the educational programs. The institution shall demonstrate through outcomes, length of service, reasonable retention of faculty, and other measures that the core faculty ensures that the institution will meet its stated mission and objectives. The institution shall promote stability in the faculty through compensation, fringe benefits, professional growth opportunities, and other incentives.

3-2-106. *Student-Teacher Ratio.* The student-teacher ratio shall be reasonable at all times in keeping with generally accepted delivery modes and course content. In determining a reasonable ratio, the institution shall consider the following factors:

- (a) the amount of lecture given by instructors in skills-building and practice classes;
- (b) the level of existing skills of the students;
- (c) the amount of direct supervision exercised by the instructor and the availability of instructional equipment in a lab setting where there is primary instruction in a specific skill; and
- (d) the use of technology in providing alternative instruction or evaluation.

3-2-200 – INSTRUCTIONAL RESOURCES, MATERIALS

The instructional resources, audiovisual teaching equipment, and instructional materials shall be adequate to serve the needs of the institution's educational programs. The resources shall be consistent with the institutional mission and include current print or digital titles, periodicals, professional journals, and/or full-text online resources appropriate for the institution's educational programs. There shall be evidence that appropriate instructional resources, equipment, technology, and materials are utilized to support the educational objectives.

3-2-201. *References.* The institution shall have available and easily accessible to faculty and students standard print, digital, or online reference works appropriate to the curriculum. Major consideration will be given to the diversity of the collection including books, periodicals, online resources and information technology readily available to students and faculty; their currency; appropriateness; and relevance to the programs offered by the institution.

3-2-202. *Distribution of Resources and Materials.* The instructional resources and references may be consolidated or may be distributed throughout the educational facility, or they may be provided by the institution under contract with an external organization on behalf of its student body which ensures access to library resources and references pertinent to the programs offered by the institution; including resources that are available exclusively online. Easy access to and use of reference materials, periodicals, and information technology are of prime importance in determining if the institution is meeting the educational needs of its students and faculty. Availability and utilization of audiovisual equipment also are important.

3-2-203. *Inventory.* A current inventory of instructional materials and equipment shall be maintained by the institution.

3-2-204. *Budget.* Budget allocations and expenditures for instructional resources, equipment, and materials may be centralized and shall be sufficient to meet the needs and fulfill objectives of the institution's programs.

Chapter 3 Standards for Occupational Associate's Degree Programs

INTRODUCTION

In addition to the general standards in Chapter 1, which apply to all institutions, the following standards apply specifically to institutions offering occupational associate's degree programs. Occupational associate's degree programs are those programs which award associate's degrees that contain less than 15 semester hours, 22.5 quarter hours, or their equivalent of general education.

3-3-100 – STATE AUTHORITY

The institution must be legally authorized by the appropriate state education agency, where such authority exists, to confer the associate's degree.

3-3-200 – EDUCATIONAL ACTIVITIES

3-3-201. Objectives. The objectives of an occupational associate's degree program are an extension of the institution's awareness of its mission and its application to its constituencies. An institution applying for the inclusion of an occupational associate's degree program shall demonstrate that its programs and courses are appropriate to its mission and to its specific goals and objectives.

Occupational associate's degree programs should emphasize both achievement of vocational objectives and general education. This emphasis requires courses in general education that are relevant both quantitatively and qualitatively to the chosen degree.

3-3-202. Education Requirements. The minimum number of credits required for the occupational associate's degree shall be 60 semester hours, 90 quarter hours, or 1800 clock hours, normally earned over a period of four semesters, six quarters, or their equivalent. Transfer and award of credit may be granted for appropriate work at other institutions.

There shall be a minimum of 10 semester hours, 15 quarter hours, or their equivalent in general education or applied general education courses. The catalog must identify the courses that satisfy the general education requirements, and it must provide an explanation of the course numbering system.

The Council's expectations for general education and applied general education are outlined in the Glossary section.

3-3-203. Curriculum. The curriculum shall quantitatively and qualitatively approximate the standards at other institutions offering occupational associate's degrees, with due allowance for meeting special objectives. The primary purpose of the degree shall be technical in nature with courses designed to assist students in the application of these skills in the workplace. Instructional procedures, texts, materials, and technology shall be appropriate to the purposes, curricula, and standards of institutions offering occupational associate's degrees. Evidence shall be provided that curricular offerings require appropriate use of library resources.

3-3-204. Enrollment. Enrollment in the second year of a two-year program must be sufficient to support regularly scheduled classes and laboratory work. Second-year work shall be based upon appropriate first-year prerequisites.

3-3-300 – FACULTY

3-3-301. Preparation. An institution offering occupational associate's degrees shall have an adequate and competent faculty working under conditions that encourage the best efforts of each individual. In judging competence, consideration shall be given to the academic preparation and experience of each instructor.

3-3-302. Assignments. During any academic term, a faculty member shall not be assigned to teach in more than three fields of instruction (e.g., medical assisting, business administration, information technology). Not more than five preparations in different subjects (e.g., Accounting I, Accounting II, Keyboarding I, Business Mathematics, and Business Law) shall be assigned to an instructor during one academic term. Instructors shall be assigned based on their major and minor academic preparation and/or related experience. The size of the faculty shall be appropriate to the total student enrollment.

The requirements for full- and part-time faculty members teaching in the referenced subject areas are as follows:

- (a) A bachelor's degree and appropriate coursework in the assigned subject are required for faculty members teaching applied general education. Instructors at a minimum shall have earned 15 semester or equivalent hours of coursework through a combination of hours from an associate's, bachelor's, master's, and/or doctoral level coursework in the area of their teaching assignment.
- (b) Instructors teaching general education shall hold a minimum of a master's degree. Instructors shall have a minimum of 18 semester or equivalent hours of coursework in their teaching discipline. At internationally based institutions, transcripts in languages other than English for general education instructors must be translated into English.

Instructors teaching courses other than general education shall hold bachelor's degrees at a minimum and shall be assigned based on their major and minor academic preparation and/or related experience. However, exceptions to the bachelor's degree requirement may be justified for instructors who have demonstrable current exceptional professional level experience in the assigned field, such as documented coursework in the field, professional certification(s), letters of recommendation or attestations from previous employer(s), letters attesting to this expertise from professional peers not connected to the college, real examples of previous success in the field such as published work, juried exhibits and shows, evidence of a professional portfolio accepted by the college and available for review, and other significant documented experience relevant to the courses to be taught. Minors or related degrees could be considered but will not be the sole determining factor. Duration of time associated with this alternative justification is dependent on the quality and significance of the work experience. The institution must be able to justify the assignment of any instructor who does not hold a bachelor's degree in the assigned teaching field.

- (c) A bachelor's degree is required for faculty members teaching business and business administration courses. If the bachelor's degree is not in the assigned teaching field, at least two years of related work experience or evidence of specialized training or competency in the assigned teaching field is required. The burden is on the institution to demonstrate and justify the qualifications of the faculty to teach their assigned courses.
- (d) Faculty members teaching courses not referenced above must demonstrate competency in the assigned teaching field, such as academic or vocational training and credentials, related work experience, licensure, or certification. The burden is on the institution to demonstrate and justify the qualifications of the faculty to teach their assigned courses.

3-3-303. Teaching Load. Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

3-3-304. Stability. There shall be an adequate core of full- and part-time faculty to ensure sound direction and continuity of development for the educational programs. The institution shall demonstrate through outcomes, length of service, reasonable retention of faculty, and other measures that the core faculty ensures that the institution will meet its stated mission and objectives. The institution shall promote stability in the faculty through compensation, fringe benefits, professional growth opportunities, and other incentives.

3-3-305. Student-Teacher Ratio. The student-teacher ratio shall be reasonable at all times in keeping with generally accepted delivery modes and course content. In determining a reasonable ratio, the institution shall consider the following factors:

- (a) the amount of lecture given by instructors in skills-building and practice classes;
- (b) the level of existing skills of the students;
- (c) the amount of direct supervision exercised by the instructor and the availability of instructional equipment in a lab setting where there is primary instruction in a specific skill; and
- (d) the use of technology in providing alternative instruction or evaluation.

3-3-400 – LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY

3-3-401. Staff. An individual with the ability to maintain the resources and to assist students and faculty shall be designated to oversee the resources of the institution.

3-3-402. Budget. An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended for the purchase of books, periodicals, library equipment, and other resource and reference materials.

3-3-403. Function. The library function is shaped by the mission and the educational programs of the institution. Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings. The resources shall include the study, reading, and information technology facilities necessary to make the educational programs effective. The ultimate test of the library's adequacy is determined by the extent to which its resources support all the courses offered by the institutions.

3-3-404. Use and Accessibility. In evaluating the use of library resources by students, consideration shall be given to accessibility and to methods used by the faculty to encourage the use of these resources by students. Records of physical and/or online circulation and inventory shall be current and accurate.

Physical and/or online library materials and services must be available at times consistent with the typical student's schedule in day, evening, and online programs. Easy access to and use of reference materials, periodicals, and information technology are of prime importance in determining if the institution is meeting the educational needs of its students and faculty. If online resources are utilized, an appropriate number of terminals and/or wireless access shall be provided for student use. Interlibrary agreements are not substitutes for an institution's library, but rather a means to supplement the institution's holdings in limited areas. In determining the appropriateness of such agreements, consideration will be given to the uniqueness of the lending library's collection, provisions for interlibrary loans, and the degree of accessibility to the students.

3-3-405. Holdings. The institution shall have available and easily accessible standard physical and/or online reference works, professional journals, and current periodicals appropriate to the curriculum. Consideration also shall be given to supplementary library resources contracted by the institution and online resources available to its student body.

3-3-406. Acquisitions. Library acquisitions are the joint responsibility of the faculty and library staff, with the greater amount of input emanating from the faculty. Moreover, it is the faculty's responsibility to inspire, motivate, and direct student usage of the library resources.

Chapter 4 Standards for Academic Associate’s Degree Programs

INTRODUCTION

In addition to the general standards in Chapter 1, which apply to all institutions, the following standards apply specifically to academic associate’s degree programs. All associate of art and associate of science degree programs are academic associate’s degree programs. Any other associate’s degree programs that include at least 15 semester hours, 22.5 quarter hours, or their equivalent of general education also are considered to be academic associate’s degree programs. Institutions that offer academic associate’s degree programs are collegiate institutions.

3-4-100 – STATE AUTHORITY

The institution must be legally authorized by the appropriate state education agency, where such authority exists, to confer the associate’s degree.

3-4-200 – EDUCATIONAL ACTIVITIES

3-4-201. Objectives. The objectives of an associate’s degree program reflect the application of an institution’s mission to its constituencies. An institution applying for the inclusion of an academic associate’s degree program shall demonstrate that its programs, courses, and services are appropriate to its mission and to its specific goals and objectives.

Programs at collegiate institutions should emphasize both the achievement of vocational objectives and general education. This emphasis requires courses in general education that are both quantitatively and qualitatively relevant to the chosen degree.

3-4-202. Education Requirements. The minimum number of credits required for the academic associate’s degree shall be 60 semester hours, 90 quarter hours, or their equivalent, normally earned over a period of four semesters, six quarters, or their equivalent. Transfer and award of credit for appropriate work at other institutions may be granted.

There shall be a minimum of 30 semester hours, 45 quarter hours, or their equivalent in courses within the areas of concentration; and a minimum of 15 semester hours, 22.5 quarter hours, or their equivalent in general education courses. Courses within the area of concentration of the subject matter of the program shall not be considered general education courses. The catalog must identify the courses that satisfy the concentration and general education requirements, and it must provide an explanation of the course numbering system.

General education and academic subject offerings, as distinguished from the professional or vocational offerings of a collegiate institution, shall place emphasis on principles and theory and not on practical applications associated with a particular occupation or profession. General education courses give balance to the total program and must be appropriate for the program and the needs of the students. The Council’s expectations for general education, humanities, mathematics and the sciences, and social sciences are outlined in the Glossary section.

3-4-203. Curriculum. The curriculum shall quantitatively and qualitatively approximate the standards at other collegiate institutions offering academic associate’s degrees. It should help students acquire necessary skills such as reading, writing, communicating, critical thinking, and the basic use of computers. Instructional procedures, texts, materials, and technology shall be appropriate to the purposes, curricula, and standards of collegiate

institutions. Evidence shall be provided that curricular offerings require appropriate use of library resources.

3-4-204. Enrollment. Enrollment in the second year of a two-year program must be sufficient to support regularly scheduled classes and laboratory work. Second-year work shall be based upon appropriate first-year prerequisites.

3-4-300 – FACULTY

3-4-301. Preparation. The institution shall have an adequate and competent faculty working under conditions that encourage the best efforts of each individual. In judging competence, consideration shall be given to the academic preparation and experience of each instructor.

3-4-302. Assignments. During any academic term, a faculty member shall not be assigned to teach in more than three fields of instruction. The size of the faculty shall be appropriate to the total student enrollment.

Instructors teaching general education shall hold a minimum of a master's degree. Instructors at a minimum shall have earned 18 semester or equivalent hours of coursework in the area of their teaching discipline. At internationally based institutions, transcripts in languages other than English for general education instructors must be translated into English.

Instructors teaching courses other than general education shall hold bachelor's degrees at a minimum and shall be assigned based on their major and minor academic preparation and/or related experience. However, exceptions to the bachelor's degree requirement may be justified for instructors who have demonstrable current exceptional professional level experience in the assigned field, professional certification(s), letters of recommendation or attestations from previous employer(s), letters attesting to this expertise from professional peers not connected to the college, real examples of previous success in the field such as published work, juried exhibits and shows, evidence of a professional portfolio accepted by the college and available for review, and other significant documented experience relevant to the courses to be taught. Minor or related degrees could be considered but will not be the sole determining factor. Duration of time associated with this alternative justification is dependent on the quality and significance of the work experience. The institution must be able to justify the assignment of any instructor who does not hold a bachelor's degree in the assigned teaching field.

In addition to the degree requirements outlined above, at least one-half of the courses, including those core courses common to nonacademic degree or nondegree programs, shall be taught by faculty members holding graduate degrees, professional degrees such as JD or MD, or bachelor's degrees plus professional certification. This calculation does not apply, however, to courses in fields in which graduate degrees, professional degrees, or professional certifications are not generally available.

3-4-303. Teaching Load. Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

3-4-304. Stability. There shall be an adequate core of full- and part-time faculty to ensure sound direction and continuity of development for the educational programs. The institution shall demonstrate through outcomes, length of service, reasonable retention of faculty, and other measures that the core faculty ensures that the institution will meet its stated mission and objectives. The institution shall promote stability in the faculty through compensation, fringe benefits, professional growth opportunities, and other incentives.

3-4-400 – LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY

3-4-401. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist

students in their use. A professionally trained individual is one who holds a bachelor's or master's degree in library or information science or a comparable program or state certification to work as a librarian, where applicable, or, for foreign institutions, one who holds a bachelor's or master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

During library hours that are scheduled and posted, there shall be a trained individual on site who is assigned to oversee and supervise the library and to assist students with library and information services. This individual shall be competent and technologically literate to use and to aid in the use of the online and computer-based library resources.

3-4-402. Budget. An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended for the purchase of books, periodicals, library equipment, and other resource and reference materials.

3-4-403. Function. The library function is shaped by the mission and the educational programs of the college. Appropriate reference, research, and information resources must be made available to provide basic support for curricular and educational offerings and to enhance student learning.

3-4-404. Use and Accessibility. The faculty should inspire, motivate, and direct student usage of the library resources. The library's adequacy ultimately is determined by the extent to which physical and/or online resources including full-text resources support all the courses offered by the institution.

For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the physical and/or online resources including full-text holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule in day, evening, and online programs. If online or computer-based resources are utilized on site, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the nature of the participating library's collection, provisions for interlibrary loans, and the degree of accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or online resources including full-text reference materials appropriate for the offerings of the institution.

3-4-405. Holdings. A collegiate library shall contain up-to-date physical and/or online resources including full-text titles appropriate for the size of the institution and the breadth of and enrollment in its educational programs. The library collection shall include holdings on the Humanities, Arts, Social Sciences, and Sciences, including mathematics; magazines and essential professional journals and periodicals that support all of the course offerings of the institution.

3-4-406. Acquisitions. Library acquisitions are the joint responsibility of the faculty and library staff, with the greater amount of input emanating from the faculty.

Chapter 5 Standards for Bachelor’s Degree Programs

INTRODUCTION

In addition to the general standards in Chapter 1, which apply to all institutions, the following standards apply specifically to bachelor’s degree programs. Institutions that offer bachelor’s degree programs are considered to be collegiate institutions.

3-5-100 – STATE AUTHORITY

The institution must be legally authorized by the appropriate state education agency, where such authority exists, to confer the bachelor’s degree.

3-5-200 – EDUCATIONAL ACTIVITIES

3-5-201. Objectives. The objectives of a bachelor’s degree program reflect the application of an institution’s mission to its constituencies. An institution applying for the inclusion of a bachelor’s degree program shall demonstrate that its programs, courses, and services are appropriate to its mission and to its specific goals and objectives.

Programs at collegiate institutions should emphasize both the achievement of vocational objectives and general education. This emphasis requires courses in general education that are both quantitatively and qualitatively relevant to the chosen degree.

3-5-202. Education Requirements. The minimum number of credits required for the bachelor’s degree shall be 120 semester hours, 180 quarter hours, or their equivalent, normally earned over a period of eight semesters, 12 quarters, or their equivalent. Transfer and award of credit for appropriate work at other institutions may be granted.

There shall be a minimum of 60 semester hours, 90 quarter hours, or their equivalent within the areas of concentration; and a minimum of 36 semester hours, 54 quarter hours, or their equivalent in general education courses. Courses within the area of concentration of the subject matter of the program shall not be considered general education courses. The catalog must identify the courses that satisfy the concentration and general education requirements and those that are upper-division courses, and it must provide an explanation of the course numbering system. The catalog must state the expectations for all four years of the bachelor’s degree curriculum and comply with Appendix C. Institutional Publications Requirements. If the institution offers only the last two years of the bachelor’s degree program, the catalog and all advertising materials must clearly describe the requirements for admission, including requirements for the completion of necessary prerequisite courses and general education courses to ensure that the student will complete all of the requirements for the bachelor’s degree upon graduation.

General education and academic subject offerings, as distinguished from the professional or vocational offerings of a collegiate institution, shall place emphasis on principles and theory and not on practical applications associated with a particular occupation or profession. General education courses give balance to the total program and must be appropriate for the program and the needs of the students. The Council’s expectations for general education, humanities, mathematics and the sciences, and social sciences are outlined in the Glossary section.

3-5-203. Curriculum. The curriculum shall quantitatively and qualitatively approximate the standards at other collegiate institutions offering bachelor’s degrees. It should help students acquire necessary skills such as reading,

writing, communicating, critical thinking, and the basic use of computers. Instructional procedures, texts, materials, and technology shall be appropriate to the purposes, curricula, and standards of collegiate institutions. Evidence shall be provided that curricular offerings require appropriate use of library resources.

3-5-204. Enrollment. Enrollment in upper-division courses must be sufficient to support regularly scheduled and conducted classes and laboratory work. Upper-division work shall be offered and shall be based upon appropriate prerequisites.

3-5-300 – FACULTY

3-5-301. Preparation. The institution shall have an adequate and competent faculty working under conditions that encourage the best efforts of each individual. In judging competence, consideration shall be given to the academic preparation and experience of each instructor.

3-5-302. Assignments. During any academic term, a faculty member shall not be assigned to teach in more than three fields of instruction and preferably in not more than two fields. The size of the faculty shall be appropriate for the total student enrollment.

Instructors teaching general education shall hold a minimum of a master's degree. Instructors at a minimum shall have earned 18 semester or equivalent hours of coursework in the area of their teaching discipline. At internationally based institutions, transcripts in languages other than English for general education instructors must be translated into English.

Instructors teaching courses other than general education shall hold bachelor's degrees at a minimum and shall be assigned based on their major and minor academic preparation and/or related experience. However, exceptions to the bachelor's degree requirement may be justified for instructors who have demonstrable current exceptional professional level experience in the assigned field, such as documented coursework in the field; professional certification(s); letters of recommendation or attestations from previous employer(s); letters attesting to this expertise from professional peers not connected to the college; real examples of previous success in the field such as published work, juried exhibits, and shows; evidence of a professional portfolio accepted by the college and available for review; and other significant documented experience relevant to the courses to be taught. Minor or related degrees could be considered but will not be the sole determining factor. Duration of time associated with this alternative justification is dependent on the quality and significance of the work experience. The institution must be able to justify the assignment of any instructor who does not hold a bachelor's degree in the assigned teaching field.

In addition to the degree requirements outlined above, at least one-half of all lower-division courses and all upper-division courses, including those core courses common to nonacademic degree or nondegree programs, shall be taught by faculty members holding graduate degrees, professional degrees such as JD or MD, or bachelor's degrees plus professional certification. This calculation does not apply, however, to courses in fields in which graduate degrees, professional degrees, or professional certifications are not generally available.

3-5-303. Teaching Load. Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

3-5-304. Stability. There shall be an adequate core of full- and part-time faculty to ensure sound direction and continuity of development for the educational programs. The institution shall demonstrate through outcomes, length of service, reasonable retention of faculty, and other measures that the core faculty ensures that the institution will meet its stated mission and objectives. The institution shall promote stability in the faculty through compensation, fringe benefits, professional growth opportunities, and other incentives.

3-5-400 – LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY

3-5-401. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one who holds a bachelor's or master's degree in library or information science or a comparable program or state certification to work as a librarian, where applicable, or, for foreign institutions, one who holds a bachelor's or master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

During library hours that are scheduled and posted, there shall be a trained individual on site who is assigned to oversee and supervise the library and to assist students with library and information services. This individual shall be competent and technologically literate to use and to aid in the use of the online and computer-based library resources.

3-5-402. Budget. An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended, for the purchase of books, periodicals, library equipment, and other resource and reference materials.

3-5-403. Function. The library function is shaped by the mission and the educational programs of the college. Appropriate reference, research, and information resources must be made available to provide basic support for curricular and educational offerings and to enhance student learning.

3-5-404. Use and Accessibility. The faculty should inspire, motivate, and direct student usage of the library resources. The library's adequacy ultimately is determined by the extent to which physical and/or online resources including full-text resources support all the courses offered by the institution.

For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the physical and/or online resources including full-text holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule in day, evening, and online programs. If online or computer-based resources are utilized on site, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the nature of the participating library's collection, provisions for interlibrary loans, and the degree of accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or online resources including full-text reference materials appropriate for the offerings of the institution.

3-5-405. Holdings. A collegiate library shall contain up-to-date physical and/or online resources including full-text titles appropriate for the size of the institution and the breadth of and enrollment in its educational programs. The library collection shall include holdings on the Humanities, Arts, Social Sciences, and Sciences, including mathematics; magazines and professional journals and periodicals that support all of the course offerings of the institution.

3-5-406. *Acquisitions.* Library acquisitions are the joint responsibility of the faculty and library staff, with the greater amount emanating from the faculty.

Chapter 6 Standards for Master’s Degree Programs

INTRODUCTION

In addition to the general standards in Chapter 1, which apply to all institutions, the following standards apply specifically to master’s degree programs.

3-6-100 – NATURE OF GRADUATE EDUCATION

The awarding of a master’s degree signifies that, in the judgment of the faculty, the student has attained specialized competence which qualifies the recipient for opportunities and additional responsibilities not ordinarily available to the baccalaureate degree recipient. To make a graduate program distinctive, a component designed to teach research skills should be included.

3-6-200 – STATE AUTHORITY

The institution must be legally authorized by the appropriate state education agency, where such authority exists, to confer the master’s degree.

3-6-300 – ORGANIZATION AND ADMINISTRATION

3-6-301. *Committee Oversight.* The responsibility for developing, modifying, and maintaining the graduate program shall be performed by a qualified designated committee to include, but not restricted to, students, faculty, administrators, and employers.

3-6-302. *Program Administration.* The administration of the graduate program shall be performed by a qualified individual with appropriate administrative and educational background and experience for the direction of a graduate program. The duties of this individual may be full- or part-time with adequate staff support.

3-6-400 – EDUCATIONAL ACTIVITIES

3-6-401. *Objectives.* The objectives of a master’s degree program reflect the application of an institution’s mission to its constituencies. An institution applying for the inclusion of a master’s degree program shall demonstrate that its programs, courses, and services are appropriate to its mission and to its specific goals and objectives. Master’s degree programs should emphasize both mastery of subject matter and an understanding of related research and research methodology. This emphasis implies development of the student’s ability to integrate and apply the subject matter.

3-6-402. *Program Development.* Graduate faculty must be directly involved in the development and modification of master’s degree program policies, procedures, and curricula. Flexible instructional approaches and scheduling patterns are encouraged in developing innovative graduate programs in order to serve varying student groups and their special needs.

3-6-403. *Education Requirements.* The minimum number of credits required for the master’s degree shall be 30 semester hours, 45 quarter hours, or their equivalent of coursework plus a thesis at the graduate level; or 36 semester hours, 54 quarter hours, or their equivalent of coursework at the graduate level if a thesis is not required. The master’s degree normally is earned over three semesters, five quarters, or their equivalent. The catalog must provide an explanation of the course numbering system.

3-6-404. Curriculum. The curriculum shall quantitatively and qualitatively approximate the standards at other institutions offering master's degrees. Instructional procedures, texts, materials, and technology shall be appropriate to the purposes, curricula, and standards of collegiate institutions. Evidence shall be provided that curricular offerings require the appropriate use of library resources.

3-6-405. Enrollment. Enrollment in graduate-level courses must be sufficient to support regularly scheduled and conducted classes and laboratory work. Graduate-level courses shall be offered and shall be based on appropriate prerequisites.

3-6-500 – FACULTY

3-6-501. Preparation. The institution shall have an adequate and competent faculty working under conditions that encourage the best efforts of each individual. In judging competence of faculty, consideration shall be given to the academic preparation and experience of each instructor.

3-6-502. Assignments. Instructors shall be assigned in terms of their major and minor areas of academic preparation and related experience. The size of the faculty shall be appropriate for the graduate enrollment. All master's program faculty should have appropriate graduate degrees, and the number with terminal degrees should be appropriate for the graduate enrollment. At least one-half of the graduate-level courses are to be taught by faculty possessing terminal degrees. Professional certification is not a substitute for a terminal degree. The institution also should encourage graduate faculty members to engage in scholarly research and to publish in professional journals.

Faculty who do not possess appropriate graduate degrees may be assigned to teach in master's degree programs if they have exceptional practical or professional experience in the assigned field or if the assigned field is one in which graduate degrees are not widely available. In either case, the burden is on the institution to demonstrate and justify the qualifications of the faculty to teach their assigned courses. Faculty assigned under this exception are not considered to have the equivalent of a terminal degree.

3-6-503. Teaching Load. Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, professional activities and/or scholarship, and community relations responsibilities of the instructor.

3-6-504. Stability. There shall be an adequate core of full- and part-time faculty to ensure sound direction and continuity of development for the educational programs. The institution shall demonstrate through outcomes, length of service, reasonable retention of faculty, and other measures that the core faculty ensures that the institution will meet its stated mission and objectives. The institution shall promote stability in the faculty through compensation, fringe benefits, professional growth opportunities, and other incentives.

3-6-600 – ADMISSIONS

3-6-601. Enrollment Prerequisites. The threshold admission requirement to a master's degree program is a baccalaureate degree.

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 such cases, admission may be granted only to eligible students who have completed, at a minimum, an associate's degree or equivalent. If the institution chooses to award a suitable baccalaureate degree upon completion of specified requirements or concurrently with the award of the professional master's degree, the baccalaureate degree curriculum must be approved by the Council.

3-6-602. *Evaluation of Applicants.* Institutions should use appropriate techniques to evaluate applicants and to determine whether they have the academic qualifications to benefit from graduate study.

3-6-603. *Transfer of Credit.* Transfer of credit for appropriate master's-level coursework from another institution may be granted according to the policy established by the institution. No more than one-half of the credits required for the master's degree may be transferred from another institution.

3-6-604. *Conformance to Institutional Objectives.* Admissions procedures, transfer policies, and requirements for graduation shall be consistent with the overall philosophy and objectives of the institution.

3-6-700 – LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY

3-6-701. *Staff.* A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one with special qualifications to aid students in research and who holds an M.L.S. degree or the equivalent, or, for foreign institutions, one who holds a master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

There shall be a professionally trained individual on duty for sufficient hours, as published by the institution, to support the programs and to assist students with library functions and research. This individual shall be competent both to use and to aid in the use of the physical, computer based, digital, and online resources.

3-6-702. *Budget.* An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended, for the purchase of books, periodicals, library equipment, and other resource and reference materials.

3-6-703. *Function.* The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students should discover information in a variety of formats with an appropriately supporting information technology infrastructure.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to enhance the effectiveness of the educational programs.

3-6-704. *Use and Accessibility.* It is the faculty's responsibility to inspire, motivate, and direct student usage of

the library resources. The library's adequacy ultimately is determined by the extent to which physical and/or online, full-text resources support all the courses offered by the institution.

For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the physical and/or online, full-text holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule in day, evening, and online programs. If online or computer-based resources are utilized on site, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible, and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the uniqueness of the lending library's collection, provisions for interlibrary loans, and the degree of accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or on-line, full-text reference materials appropriate for the offerings of the institution.

3-6-705. *Holdings.* The library shall support the academic programs and the intellectual and cultural development of students, faculty, and staff; shall provide current and appropriate physical and/or online, full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; and shall be capable of supporting an understanding of the methods and principles scholarly research and how to use information ethically at the graduate level.

3-6-706. *Acquisitions.* Library acquisitions are the joint responsibility of the faculty and library staff, with the greater amount of input emanating from the faculty.

3-6-800 – PUBLICATIONS

There shall be a separate section in the institution's catalog describing the master's degree objectives, program requirements, admissions procedures, transfer policies, graduation requirements, regulations, and course descriptions.

Chapter 7 Standards for Doctoral Degree Programs

INTRODUCTION

In addition to the general standards in Chapter 1, which apply to all institutions, the following standards apply specifically to doctoral degree programs and are being applied as part of a pilot project. The current scope of recognition for ACICS, as approved by the U.S. Department of Education and the Council for Higher Education Accreditation, includes diploma programs and degree programs through the master's degree. Therefore, accreditation of a doctoral program by ACICS does not make the program eligible for purposes of participation in federal student aid programs, as described in Title IV of the HEA. Institutions may confer only professionally-oriented doctoral degrees. Unlike academic doctoral degrees that prepare students to work in academia or research, professional doctoral degrees are designed to make students experts in their fields and in the workplace. As such, the outcomes for those earning a professional doctoral degree involve using knowledge and techniques to purposefully address problems and opportunities in their workplace. These include degrees such as the JD, Ed.D., DFA, and DBA but excluding Ph.D.

3-7-100 – NATURE OF DOCTORAL EDUCATION

The awarding of a professional doctorate degree signifies that, in the judgment of the faculty, the student has attained specialized and practical competence which qualifies the recipient for opportunities and additional responsibilities beyond the master's degree level.

The doctoral degree is to be professionally oriented and must include the following:

- (a) coursework which heightens the level of professional expertise in the area or field of study sought;
- (b) an understanding of appropriate research methods relevant to the area or field of study sought. The goal of the research is to apply technologies, knowledge, or concepts in a new way to a workplace problem. This provides the student an opportunity to apply knowledge to a high-level issue in the same way he or she might operate at work; and
- (c) evidence that the coursework enables graduates to function/perform in the area or field of study sought.

To make a doctoral program distinctive, a component shall be designed to include practical research or a research project, or dissertation, or other required academic activities. A doctoral degree program is further designed to provide the mastery of a subject, theory, and methodology in a specific field of study. The program shall have a strategic plan that describes the purpose of the program, provides guidance about its future, and identifies measures used to define its success.

3-7-200 – STATE AUTHORITY

The institution must be legally authorized by the appropriate state or national education agency, where such authority exists, to confer the doctoral degree.

3-7-300 – ORGANIZATION AND ADMINISTRATION

3-7-301. *Committee Oversight.* The responsibility for developing, modifying, and maintaining the doctoral degree program shall be carried out by a qualified designated committee to include, but not restricted to, faculty and administrators who, at a minimum, possess a doctoral/terminal professional degree in a related subject area.

3-7-302. Program Administration. The administration of the doctoral degree program shall be the responsibility of a qualified individual with appropriate administrative and educational background and experience related to a doctoral degree program. These qualifications must include a doctoral/terminal professional degree in a related subject area. The duties of this individual should be full-time with adequate staff support. The program must require students to work with a well-qualified and credentialed committee knowledgeable in methods of research and in the subject matter, chaired by an appropriately credentialed individual with expertise in the program area.

3-7-303. Program Advisory Committee. A program advisory committee, comprised of individuals from similar accredited doctoral programs and representatives of the employers that would be hiring graduates, shall meet at least annually with program administrators and faculty. The committee shall provide advice and guidance about the program, the currency and content of its curriculum, admissions criteria, and externship opportunities. Members of this committee may also provide information regarding the validity and rigor of the program and the quality of the graduates.

3-7-400 – EDUCATIONAL ACTIVITIES

3-7-401. Objectives. The objectives of a doctoral degree program reflect the application of an institution's mission to its constituencies. An institution applying for the inclusion of a doctoral degree program shall demonstrate that its programs, courses, and services are appropriate to its mission and to its specific goals and objectives. Doctoral degree programs should emphasize both mastery of subject matter and an understanding of related research and research methodology. Specific program objectives must be clearly stated.

The practical application of research methods must be emphasized in professional doctoral degree programs. This emphasis implies development of the student's ability to integrate and apply research to issues related to the discipline and its knowledge base as used in industry.

3-7-402. Program Development. Doctoral faculty must be directly involved in the development and modification of a doctorate degree program's policies, procedures, and curricula. Flexible instructional approaches and scheduling patterns are encouraged in developing innovative doctoral degree programs to serve varying students and their needs. The learning objectives must be advanced and provide the depth of practical learning or research.

3-7-403. Education Requirements. The number of credits required for the doctoral degree shall be, at a minimum, 90 semester hours, 135 quarter hours, or their equivalent of coursework beyond the bachelor's degree. If a master's degree in the same field of study, earned at an institution accredited by an agency recognized by the U.S. Department of Education, is required as a prerequisite for admission to the doctoral degree program, the number of credits required for the doctoral degree shall be, at a minimum, 54 semester hours, 81 quarter hours, or their equivalent. This includes credit for the research project/dissertation or other required academic or professional activities.

The doctoral degree normally is earned over three to five years or the equivalent for full-time students. Limitations on the time to degree for part-time students need to be clearly outlined. Statutes of limitations for program completion and coursework must be clearly disclosed to students and included in the institutional catalog as well as on the enrollment agreement.

For certain first-professional degrees whose structure differs from that of other professional doctoral degrees, the required credit hour total and expected time to degree shall conform to what is typical for the field.

The catalog must provide a detailed explanation of the required courses in the program, as well as a description of the required activities and research elements necessary to complete the program.

3-7-404. Curriculum. The curriculum shall quantitatively and qualitatively approximate the standards at other institutions offering comparable degrees. Instructional procedures, texts, materials, and technology shall be appropriate to the purposes, curricula, and standards of collegiate institutions. Evidence shall be provided that

curricular offerings require the appropriate use of research and library resources.

The program must be designed for each student to accomplish specified goals and objectives and contribute to competence in the subject area or profession at an advanced level. Such activities and requirements must be approved by a designated individual and at least two additional individuals within the respective field of study with appropriate credentials.

The research project or other required academic or professional activities must be reviewed, evaluated, and assessed by a committee as described above. At least one individual on the committee must be from another appropriately accredited institution within the subject area.

For programs that include the following components, credit hours shall be part of the total credits required for program completion and shall be allocated as follows:

- (a) Research project or dissertation – Credit hours shall not exceed 15 semester hours (22 quarter hours) for the research project.
- (b) Independent and directed studies – Credit hours shall not in total exceed 9 semester hours (14 quarter hours) and must consist of an experience(s) that directly relates to and complements the student's program of studies.
- (c) Internship or practicum – An internship or practicum shall be required of students with no or limited experience in the work environment they are prepared to enter. Credit hours shall not exceed 6 semester hours (9 quarter hours). Credit shall not be awarded for work experience that occurred before the student entered the program or as part of a current job.

3-7-405. Enrollment. Enrollment must be sufficient to support regularly scheduled and conducted classes and coursework. Doctorate-level courses shall be offered and shall be based on appropriate prerequisites.

3-7-500 – FACULTY

3-7-501. Preparation. The institution shall have an adequate and competent faculty working under conditions that encourage the best efforts of each individual. In judging competence of faculty, consideration shall be given to the academic preparation and experience of each instructor.

3-7-502. Assignments. All doctoral degree courses shall be taught by faculty possessing doctoral or terminal professional degrees, related to the courses taught, from accredited or government-recognized international institutions. These individuals also must demonstrate expertise in the field of study taught, possess applicable professional experience for participating in a doctoral degree program, and maintain current professional certification in their discipline, where applicable.

Faculty shall be assigned in terms of their major and minor areas of academic preparation, related professional experience, and appropriate required professional certification to practice in the field. The size of the faculty shall be appropriate for the enrollment in the program. The institution shall demonstrate that faculty members are engaged in practical or scholarly research and are encouraged to publish in professional journals.

3-7-503. Teaching Load. Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; academic advising, committee membership, and student guidance assigned; and the other administrative, research, publication, professional activities and/or scholarship, and community relations responsibilities of the instructor.

3-7-504. Stability. The proportion of faculty employed on a full-time basis shall be sufficient to ensure sound direction and continuity of development for the educational programs. The institution shall demonstrate through outcomes and other measures that the proportion of full-time faculty and the faculty's average length of service to

the institution allow the institution to meet its stated mission. The institution shall promote stability in the faculty through compensation, fringe benefits, professional growth opportunities, and other incentives.

3-7-600 – ADMISSIONS

3-7-601. *Enrollment Prerequisites.* The threshold admission requirement to a doctoral degree program is, as appropriate, a bachelor's or master's degree earned from an appropriately accredited institution recognized by the U.S. Department of Education. A specific enrollment agreement must be established for the doctoral degree program.

3-7-602. *Evaluation of Applicants.* Institutions should use appropriate techniques to evaluate applicants and to determine whether they have the academic qualifications to successfully complete introductory doctoral-level coursework.

International students should have English skills to effectively communicate with faculty, staff, and other students. For non-English speaking students, a TOEFL score of 550 or an equivalent score on an internationally recognized test is required to enter a program offered at a U.S.-located institution.

3-7-603. *Transfer of Credit.* The institution shall make public its policies on transfer of credit, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution. If the prerequisites for admission to the doctorate program is a master's degree in the same field of study earned at an institution accredited by an agency recognized by the U.S. Department of Education, a maximum of 36 semester hours, 54 quarter hours, or their equivalent may be granted as transfer credits according to the policy established by the institution. In all other cases, no more than 20% for the doctoral degree may be transferred from another institution. Academic credit shall not be awarded for experiential learning activity.

3-7-604. *Conformance to Institutional Objectives.* Admissions procedures, transfer policies, and requirements for graduation shall be consistent with the overall philosophy, mission, and objectives of the institution.

3-7-700 – LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY

3-7-701. *Staff.* A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one with special qualifications to aid students in research and who holds an M.L.S. degree or the equivalent, or, for foreign institutions, one who holds a master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of Association of International Credential Evaluators (AICE), American Association of Collegiate Registrars and Admissions Officers (AACRAO), or National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

There shall be a professionally trained individual on duty for sufficient hours, as published by the institution, to support the programs and to assist students with library functions and research. This individual shall be competent both to use and to aid in the use of the physical, computer-based, digital, and online and resources.

3-7-702. *Budget.* An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended, for the purchase of books, periodicals, library equipment, and other resource and reference materials.

3-7-703. Function. The library function is shaped by the mission and the educational programs of the institution. Institutions offering doctoral degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for master's degree programs.

Students demonstrate the ability to define problems; access, evaluate, and analyze a variety of resources; and use retrieved information ethically.

These resources shall include bibliographic and monographic references, major professional and scholarly journals and reference services, research and methodology materials, and information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the student to encourage the intellectual development of students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to enhance the effectiveness the educational programs.

3-7-704. Use and Accessibility. Faculty are responsible for inspiring, motivating, and directing student usage of the library resources. The library's adequacy ultimately is determined by the extent to which physical and/or online, full-text resources support all the courses offered by the institution. For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule in day, evening, and online programs. If online or computer-based resources are utilized, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the uniqueness of the lending library's collection, provisions for interlibrary loans, and the degree of accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or online reference materials appropriate for the offerings of the institution.

3-7-705. Holdings. The library shall support the academic programs and the intellectual and cultural development of students, faculty, and staff; shall provide current and appropriate physical, digital, and/or online full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; and shall be capable of supporting scholarly research at the doctoral level.

3-7-706. Acquisitions. Library acquisitions are the joint responsibility of the faculty and library staff, with the greater amount of input emanating from the faculty.

3-7-800 – PUBLICATIONS

There shall be a separate section in the institution's catalog describing the doctoral degree program requirements, admissions procedures, transfer policies, graduation requirements, regulations, and course descriptions.

GLOSSARY

The following definitions are provided in order to assist institutions in understanding and interpreting the Accreditation Criteria. The definitions include some of the most commonly used terms and are defined to reflect their most common usage. These normative definitions drawn from no single source are offered by way of example rather than limitation. The Council recognizes the evolving and dynamic nature of American postsecondary education. It has no intention of imposing rigid expectations. When an institution departs from these norms it may be called upon to defend the academic integrity of the questioned activity.

A

- Ability to Benefit.** A determination made by the institution that, in the absence of a high school diploma or GED certificate, the student will be able to benefit, with or without remediation, from the program(s) offered at the institution. The determination should be made before the person is financially obligated or enrolled in a program.
- Academic Credential.** A certificate, diploma, or degree stating that the student has graduated from a certain curriculum or has passed certain subjects.
- Academic Probation.** Students placed on academic probation are subject to increased scrutiny of their academic achievements due to a previous history of academic difficulty. The probation policy must define the conditions of probation, including how long a student may remain on probation and the requirements for being removed from probation. The institution may establish additional policies as it desires.
- Academic Year.** A period of time generally divided into two semesters, three quarters, or their equivalent, in which a full-time student is expected to complete the coursework equivalent to at least two semesters, three quarters, or their equivalent.
- Accreditation.** The process whereby a nationally recognized agency or organization grants public recognition to a unit of an educational organization (such as a school, institute, college, university, or specialized program of study) indicating that it meets established standards of quality as determined through initial and periodic self-study and evaluation by peers. The essential purpose of the accreditation process is to provide a professional judgment as to quality of the educational institution or program(s) offered and to encourage continual improvement thereof.
- Achievement Test.** A test which measures a student's existing skills and knowledge (that which has been taught to the student) in particular areas such as reading, math, map skills, grammar, etc.
- Additional Location.** See Campus, Branch.
- Applied General Education.** Applied general education is defined as courses that involve the application of principles and concepts in communications, humanities and fine arts, mathematics, natural and physical sciences, social and behavioral sciences, and technology to the practical affairs of a specific occupation or occupational cluster. Applied general education courses enhance the ability of an individual to apply academic and occupational skills in the workplace. Examples of applied general education courses include technical writing, business writing, business statistics, business mathematics, organizational behavior, and human relations.
- Aptitude Test.** Aptitude and its tests refer to the ability/potential to do schoolwork in different areas such as mechanics, art, clerical procedures, verbal, and numerical ability. (Important factors such as home environment, familiarity with the English language, and physical and psychological well-being at the time of the test all affect this kind of measure.) Aptitude tests often are timed, often are multiple choice, and are "normed" for cutoff score on a nationwide sampling of students.
- Area of Concentration.** In a degree program, the focus of study. Also known as the major. The requirements for the major or area of concentration are based upon clearly defined and articulated learning objectives, including a mastery of the knowledge, methods, and theories pertinent to a particular area of inquiry, discipline, or field. General education and other courses not related to the major do not qualify as concentration coursework.
- Articulation.** An understanding or agreement between institutions to accommodate the movement of students and the

transfer of credits between institutions.

Asynchronous Interactions. Teaching/learning interactions between students and instructors which take place intermittently or non-simultaneously with a time delay.

Audioconferencing. Structured voice-only teaching/learning interaction among individuals or groups in two or more sites.

B

Blended Course or Blended Learning. A course or learning activity that combines online and face-to-face, in-class sessions. Also called “hybrid” course or learning.

Bulletin Board System (BBS). A computer-based online community which allows participants to interact with each other through text messages.

C

Calendar. The system by which the institution structures its school (academic) year. The three common types of calendars are the semester, the quarter, and the trimester. The semester calendar is generally composed of two semesters of 15 to 17 weeks of classes each including final examinations. The quarter calendar is generally composed of three quarters, usually with 10 to 12 weeks of classes each including final examinations. The summer quarter is sometimes subdivided into terms of shorter length. The trimester calendar is composed of three 15-week terms including final examinations. The third may be subdivided.

Campus. All facilities where educational activities take place that are under the direct control of the on-site administration.

Campus, Branch. A branch campus is a location of an institution that is geographically apart and independent of the main campus of that institution but under the same corporate structure as the main campus (i.e., part of the main campus corporation or a wholly owned subsidiary). The branch campus is permanent in nature, offers courses in educational programs leading to a degree, certificate, or other recognized educational credential, and has its own budget, faculty, administrative staff, and supervisory organization.

Campus, Main. A main campus is the primary location of an institution accredited by ACICS. This campus is expected to meet fully all applicable standards set forth in the *Accreditation Criteria*. (See Section 1-3-101.)

Campus Addition. See Learning Site

Category Grant. An institutionally financed award to all students who qualify by meeting the published standards for a grant to similarly circumstanced students, such as a grant to active members of the military.

Certificate. A document issued to evidence completion of a course, seminar, or an academic program. An academic program awarding a certificate is usually shorter in length than a program resulting in a diploma. (See also Diploma.)

Chat Room. An online or virtual meeting space for multiple learners to engage in real-time text-based discussions.

Clock (or Contact) Hour. A minimum of 50 minutes of supervised or directed instruction and appropriate break(s).

Community Resources. A variety of individuals, organizations, or businesses that provide information, guidance, or support to a specific program of study or career opportunity, such as professional and trade associations, employers, and guest speakers.

Competency-based Program. A competency-based program clearly defines the skills, knowledge and professional behavior (“soft skills”) that are required for a student or a graduate to perform at a level considered to be “competent” by practitioners and employers in the field. It focuses on direct, not indirect, assessment methods to measure student learning in lieu of in-class seat time, credit hours, or clock hours. It utilizes a robust curriculum development process and comprehensively specifies how qualified faculty and/or other eligible experts in the field would directly assess the achievement of required competencies and student learning. (See also Direct Assessment Competency-based Programs.)

Competency Test. A test with pre-established standards to measure performance. An example would be a spelling component consisting of ten questions where a score of seven or more is passing. The cutoff “pass-fail” point

is referred to as criterion referenced. Usually used for promotion or graduation purposes, these tests are not standardized nationally.

Computer-Assisted Instruction (CAI). A type of self-paced instruction that uses the computer as the primary medium for tutorials, drills, repetitive practice, simulation, or games.

Connect Time. The amount of time that an online student has been logged on to the education provider's computer or server for a particular session. The connect time may be used by a school to monitor an online student's "attendance" and participation in a class session.

Course. A single subject described in an institutional catalog or bulletin.

Credit. (1) The quantitative measurement assigned to a course generally stated in semester hours, quarter hours, or clock hours. (2) The recognition awarded upon successful completion of coursework.

Credit Conversion. The process of converting units of credit based on one kind of calendar to units based on another kind of calendar. For example, the three most common calendars convert as follows: quarter hours multiplied by two-thirds equal semester hours; semester hours multiplied by one and one-half equal quarter hours; and trimester hours are equal to semester hours unless the trimester is of less than 15 weeks' duration, in which case the number of weeks and length of class sessions must be considered. While the institution may present itself as credit-without-term, one of the three traditional calendars must be used.

Credit Hour. A unit by which an institution may measure its coursework. The number of credit hours assigned to a traditionally delivered course is usually defined by a combination of the number of hours per week in class, the number of hours per week in a laboratory, and/or the number of hours devoted to externship times the number of weeks in the term. One unit of credit is usually equivalent to, at a minimum, one hour of classroom study and outside preparation, two hours of laboratory experience, or three hours of externship, or a combination of the three times the number of weeks in the term. The number of credit hours assigned to a nontraditionally delivered course must be determined and justified by the institution and approved by the Council.

Credit Hour, Quarter. The number of credit hours assigned to a traditionally delivered course consists of a minimum of 10 classroom lecture periods of not less than 50 minutes each and which assumes outside reading and/or preparation, 20 laboratory clock hours where classroom theory is applied and explored or manipulative skills are enhanced, 30 hours of external discipline-related work experience with indirect instructor supervision or employer assessment, or an appropriate combination of all three. The number of credit hours assigned to a nontraditionally delivered course must be determined and justified by the institution and approved by the Council.

Credit Hour, Semester. The number of credit hours assigned to a traditionally delivered course consists of a minimum of 15 classroom lecture periods of not less than 50 minutes each and which assumes outside reading and/or preparation, 30 laboratory clock hours where classroom theory is applied and explored or manipulative skills are enhanced, 45 hours of external discipline-related work experience with indirect instructor supervision or employer assessment, or an appropriate combination of all three. The number of credit hours assigned to a nontraditionally delivered course must be determined and justified by the institution and approved by the Council.

Credit Hour, Trimester. A minimum fifteen-week term. Trimester credits are equivalent to semester credits.

Curriculum. A program of courses fulfilling the requirements for a certificate, diploma, or degree in a particular field of study. (See definition of Program.)

D

Degree. Credential awarded as official recognition for the successful completion of an academic program.

Degree, Advanced. A degree beyond the bachelor's degree (e.g., M.A., M.S., M.B.A., Ph.D.).

Degree, Associate. The academic credential granted upon successful completion of an educational program of generally two but less than four years of full-time equivalent college-level work including a minimum number of credits as specified under Sections 3-3-202 and 3-4-202.

Degree, Baccalaureate. The academic credential granted upon successful completion of an educational program of

four years of full-time equivalent college-level work including a minimum number of credits as specified under Section 3-5-202.

Degree, First Professional. The first degree signifying completion of the minimum academic requirements for practice of a profession. A first professional degree is most commonly a bachelor's degree, but is sometimes a master's or doctorate (e.g., M.L.S., J.D., M.D.).

Degree, Graduate. (1) In general, any degree conferred by a graduate division or a graduate school of an institution of higher education. (2) More specifically, all advanced degrees, and also all first professional degrees which are conferred by graduate schools.

Degree, Professional Doctoral. The degree signifying completion of the advanced academic requirements for practice of a profession. A professional doctoral degree is most commonly a practitioner-based degree beyond the master's degree level (i.e., JD, Ed.D., DFA, DBA, etc. but excluding Ph.D.).

Degree, Specialized. The credential granted upon successful completion of an educational program of at least two academic years or equivalent of college-level work which includes an emphasis on occupational and technical coursework.

Diploma. A document issued to evidence successful completion of an academic program. A diploma is awarded for programs varying in length from only a few months to those lasting several years and awarding degrees.

Direct Assessment Competency-based Program. A program that clearly defines the skills, knowledge, and professional behavior ("soft skills") that are required of a student or a graduate to perform at a level considered to be "competent" by practitioners and employers in the field. Only "direct" assessment of student learning and competencies are acceptable. Direct assessment measures must apply to the course competencies required for the program. Examples of "direct assessment" measures are as follows: acceptable scores on industry-recognized licensure or certification examinations; standardized tests; pre- and post-tests; examinations and quizzes; research projects; case study analysis; criterion-based rating scale or rubric scores; course-embedded questions; observation of clinical experience, internships, or field work; and capstone projects, theses, exhibits, or performances. (For a federal definition and for Council standards, see Appendix II, Section 1.)

("Indirect assessment" measures of student learning, while deemed valuable for institutional program evaluation and enhancement, are not included in the consideration for approval of a competency-based program. Examples of indirect measures are as follows: course evaluations; hours spent in classes or on out-of-class educational activities; graduate or employer satisfaction surveys; graduate placement rates; student retention rates; and student perception surveys.)

Distance Education or Distance Learning. A structured educational situation in which the students and instructors are physically separated. Distance education supports regular and substantive interaction synchronously or asynchronously between instructor and learner, among learners, and between learners and learning resources through one or more interactive technologies.

E

Electronic Learning or E-learning. Refers to a wide range of methodologies used in the delivery of instructional content via Internet, satellite broadcast, interactive TV, CD-ROM, etc.

Employer Satisfaction. Employer satisfaction and the level of satisfaction are defined by the campus based upon information collected, typically via a survey, on a regular basis from employers who have hired graduates of programs offered by the campus. Satisfaction questions should cover different aspects of career preparation in general (such as professionalism and 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 to perform tasks which utilize such skills.

Enrollment, Full-Time Equivalent. The equivalent number of full-time students at an established census date, equivalency being established by dividing the total student credit hours by the assumed normal individual load of credit hours.

Externship. A practical experience, under the supervision of a qualified faculty member, that is the application of previously studied theory. Normally, three hours of work in a practical setting has the credit equivalency of

one hour of classroom lecture. A written agreement shall be developed that outlines the arrangement between the institution and the externship site, including specific learning objectives, course requirements, and evaluation criteria.

F

Face-to-Face or F2F. Refers to the traditional classroom teaching/learning environment. Also known as Instructor-led Training or ILT, on-ground training, or on-site training.

Faculty Contact Hours. The total hours of scheduled instructional activity spent by instructional faculty as of a specific period of time. If a course meets three hours per week for 15 weeks, it yields 45 contact hours.

Faculty Development. The activities by which faculty gain knowledge and skills to enhance expertise in the specific area(s) of instruction or on new curriculum concepts, theories and techniques of instruction, and educational media. The institution must demonstrate that the balance between methodology training (in-service) and content knowledge enhancement (professional growth) is appropriate for the individual faculty member. All activities must be documented. (See also In-Service Training and Professional Growth.)

Financial Aid. Student financial assistance funded by state or federal programs and administered by the institution.

Follow-up. The study of any group of students or former students of the institution who have shared a common experience to determine if patterns emerge in their subsequent actions or behavior which prove useful in understanding, counseling, and establishing policies for other students; for example, a study of the number of graduates who have entered graduate schools or a study of the number of graduates who have obtained employment.

Four-Year Institution. (1) Literally, an institution of higher education offering four years of college-level work culminating in a bachelor's degree. (2) In common usage, distinguished from a two-year institution and characterized by offering four or more years of coursework normally creditable toward a bachelor's or higher degree or equivalent award. In addition to coursework normally creditable toward a bachelor's or higher degree, four-year institutions may also offer other types of instruction; e.g., courses in general and continuing education, short courses, occupational curricula leading to an associate's degree, etc.

Full-Motion Video. Transmission of the complete action taking place at the originating site.

G

General Education. Those areas of learning which are deemed to be the common experience of all "educated" persons and must include subject matter from the humanities, mathematics and the sciences, and the social sciences.

General Education. Humanities. Courses in fields such as literature, philosophy, logic, foreign language, art, music, theater appreciation, and communications, including rhetoric, composition, and speech but excluding business communications and business writing.

General Education. Mathematics and the Sciences—Courses such as biology, chemistry, physics, geology, astronomy, and mathematics theory and analysis, including algebra, trigonometry, geometry, calculus, and other advanced mathematics courses, but excluding business mathematics and basic computations.

General Education. Social Sciences—Courses such as history, economics, political science, geography, sociology, anthropology, and general psychology, but excluding courses such as practical psychology, selling techniques, and social or business behavior.

Graduate Satisfaction. Graduate satisfaction and the level of satisfaction are defined by the campus based upon information collected on a regular basis from students who have graduated from the programs offered by the campus. Recommended information includes the results of surveys of all graduates who left the institution at least 30 days prior to being contacted. Satisfaction questions should cover different aspects of the program and the campus as well as overall satisfaction of the graduate with the preparation provided by the campus for the position.

H

Home Institution. In a case where an institution collaborates with another entity for the delivery of distance education

courses. “home institution” is the campus through which the student enrolls for the course. The Home Institution is responsible for assuring that accrediting standards are met, for providing on-campus services, and for clearly demonstrating through a formal Consortium Agreement the roles and responsibilities of the Home Institution and the Host Institution, which may deliver the distance education courses and specified online services. The Consortium Agreement must be approved by ACICS and must provide for evaluation visits to the Host Institution as may be required by ACICS.

ACICS expects the Home Institution to offer more than 50% of a program if courses are delivered under a distance education Consortium Agreement with an approved accredited institution, and to offer a minimum of 75% of a program if courses are delivered under a distance education Consortium Agreement with an approved unaccredited entity.

Host Institution. The institution which collaborates with an accredited institution in delivering distance education courses and specific online services as described in a formal Consortium Agreement approved by ACICS. The Consortium Agreement must provide for evaluation visits to the Host Institution as may be required by ACICS. If the Host Institution is an approved unaccredited entity, it is subject to an evaluation visit once every three years as required by ACICS.

Humanities. See General Education. Humanities.

Hybrid Course or Hybrid Program. A hybrid course is one which mixes face-to-face, traditional classroom instruction with online instruction. A hybrid program is one which offers or requires a percentage of the required courses in a program online. ACICS requires the school to clearly outline the percentage of online activity included in a course or a program. Institutions are required to apply for and secure approval prior to initiating any distance education activity and also when it increases its distance education activity to the extent that it constitutes 50% or more of a program.

I

In-Service Training. Special planned and systematic experiences sponsored by an institution and related to curriculum and instruction that affect the majority of the faculty in a collective fashion. In-service education has as its major goal the updating of teachers in (1) subject matter, (2) curriculum concepts, (3) new theories and techniques of instruction, and (4) new educational media.

Independent Study. Independent study involves a high level of independence and self-direction on the part of the student to read, conduct research, and complete written examinations, reports, research papers, and similar assignments designed to measure the student’s grasp of the subject matter. Under the supervision of a faculty member, a learning contract signed by the student and institution shall be developed which outlines specific learning objectives, texts, supplemental readings, course requirements, evaluative criteria, and examination dates. Because independent study classes are the exception and not the rule, the number of courses that a student will be allowed to take independently should be limited.

Information Technology. Method or modes of delivering training, education, or research information via current or new telecommunications technologies, such as television broadcasts, closed circuit television systems, cable television, satellite transmissions, computers and computer-based access to external learning resources, videotape and interactive video disc, audio by disc, tapes or broadcasts, and other such information and telecommunications systems that alone or in combination assist in teaching and learning.

Institution. A main campus and any branch campuses of that main campus. As an institutional accreditor, ACICS accredits institutions as a whole and does not separately accredit individual campuses or programs. (See Title I, Chapter 3, Introduction.)

Institution, Multiple-Campus. An institution that provides educational programs at one main campus and one or more branch campuses. (See Section 1-3-202.)

Institution, Single-Campus. An institution that provides educational programs at one main, free-standing campus. (See Sections 1-3-201 and 2-2-201.)

Integrated Learning System or ILS. A network system that provides a complete package of curriculum, assessment capabilities, record keeping, and other aids to monitor and manage student learning activity.

Internship. See Externship.

L

Laboratory. A learning environment where students apply knowledge or instruction to enhance skills and solve problems. Normally, two hours of work in a laboratory environment, under the supervision of an instructor, has the credit equivalency of one hour of classroom lecture.

Learning Management System or LMS. A system to manage courses created by a variety of publishers and providers. The LMS also helps the school manage online or distance education activity by providing critical reporting mechanisms.

Learning Object. An e-learning content module which is reusable, easily classified, and stored in a data repository.

Learning Site. A learning site is a classroom extension of a main campus or branch campus that is apart from the managing location and is capable of providing sufficient academic and administrative oversight, providing access to all student services and instructional resources and maintaining academic quality. Learning sites used for delivery of distance education activity or collaborative arrangements with other entities for specific on-site educational activity must be approved by the Council on a case by case basis and are subject to a quality assurance visit as specified by the Council.

Lecture. A learning environment where a teacher instructs students in the theory, principles, or history of an academic or vocational subject. To maximally benefit from such instruction, a student is assumed to have done outside preparation. Two hours of preparation for each hour of instruction are generally assumed.

Loan. An advance of money, generally evidenced by a promissory note, on the agreement to repay absolutely such advance, with or without interest.

Lower-Division Course. Generally, a survey course that includes an introductory overview of a particular area of knowledge. These courses often do not include a prerequisite for enrollment and frequently are offered to freshman- and sophomore-level students. Lower-division courses usually carry course numbers in the 100-299 or 1000-2999 range.

M

Mathematics and the Sciences. See General Education. Mathematics and the Sciences.

N

Need-based Grant. An institutionally financed award to a student who demonstrates a need for financial assistance in order to participate in the educational program. Need-based grants must be made available to all students on the same terms.

O

Online Learning. A term used interchangeably with Internet-based Learning, Web-based Learning, and Distance Learning.

Outcomes, Campus. The intended result or end result of an activity or process in the assessment of effectiveness. In determining effectiveness, campuses are required to evaluate the following outcomes: placement rates; retention rates; licensure examination pass rates (where applicable); employer satisfaction; graduate satisfaction; student satisfaction, and other student learning outcomes. Campuses also may use additional outcomes in evaluating effectiveness.

P

Placement. Working in the field of study or acquiring a credential that directly benefits the graduate's existing employment.

Placement Rate. The Placement Rate is defined by ACICS in terms of the total number of completers and graduates minus those who are not placed (employed), divided by the total number of completers and graduates, and

expressed as a percent. 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 placed adjustments, and exclusions for students not available for placement.

Practicum. See Externship.

Professional Growth. The process by which employees gain knowledge and skills which enhance their expertise. Professional growth may be accomplished through a combination of the following activities: membership and participation in educational associations, professional organizations, continuance of education, concurrent related business experience, educational research, and awareness of current practices and standards.

Attendance at seminars, conventions, field visits, vendor shows, equipment exhibits, etc., are excellent opportunities for instructors to gain enrichment. Professional writing by an instructor is also an example of professional growth.

Program. A sequential grouping of courses which forms a considerable part, or all, of the requirements for an academic credential or an occupational objective. May refer to the total educational offering of an institution. (See Curriculum.)

R

Record, Admissions and Advisement. Official documents of admissions data, counseling, and advising. Such documents include but are not limited to applications for admission or readmission (for matriculants), admissions letters, denial and waitlist notifications, aptitude/assessment test scores, military records, degree audit records, transfer credit evaluations, transcripts reflecting degrees earned from other institutions, and counseling and advising correspondence.

Record, Financial Aid. Official documents regarding any grant, scholarship, or loan offered to assist the student in meeting college expenses. Documentation may vary depending upon the funding source (e.g. state or federal programs, high schools, foundations, or corporations).

Record, Permanent Academic. Official document of the student's scholastic progress. Such documents include, but are not limited to, official transcripts; final grade reports detailing each course code, course title, and final grades for a given year and term; and any documented change to final grades.

Record, Student. A record (electronic or hard-copy) which is comprised of, at a minimum, a student's admissions and advisement, permanent academic, and financial aid records.-

Refund. Return of money, cancellation of obligation, or otherwise resolution of the debt.

Regular student. A student who is enrolled in a program leading to a certificate, diploma, or degree at an institution and is satisfactorily progressing toward program completion in compliance with the Standards of Satisfactory Progress as stated in Sections 3-1-420 through 3-1-423. Any other student attending the institution is considered in an extended enrollment status and is not eligible for government student aid.

Retention Rate. 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.

S

Scalability. Provisions available for a computer application to handle expansions in size, volume, or number of users without undue disruption.

Scholarship. (1) The quality of a student's achievement in the student's studies. (2) A financial award which does not involve repayment. A scholarship may be institutionally financed or funded by a third party. It is awarded by the institution in accordance with published standards which describe student qualifications and the source of funding. Reasons for the award may include one or more qualifications such as the student's performance (or

potential for performance) in the educational program of the institution, financial need, talents sought, and service valued by the institution or the third party.

Self-paced Instruction. An educational delivery method by which a student progresses through a course or program of study in residence utilizing either computer software or instructional materials and resources. Students progress through the course or program at their own pace with limited interaction with the instructor. The instructor, however, is responsible for overseeing the progress of the student and for evaluating and grading the student.

Simulations. Computer applications that offer highly interactive options for the learner to practice skills, model, or role-play in realistic scenarios.

Social Sciences. See General Education. Social Sciences.

Student, Full-Time. A student who is enrolled in a minimum of 12 credit hours per term or its equivalent.

Student Learning Outcomes. Concise measurable statements of direct and indirect learning outcomes with assessments that specify what students will know, be able to do, or demonstrate as a result of a specific, planned education experience. Student learning outcomes are expressed as measurable knowledge, skills, abilities or attitudes. (For more information about *Direct and Indirect Assessment of Learning Outcomes*, see Direct Assessment Competency-based Programs.)

Student Satisfaction. Student satisfaction and the level of satisfaction are defined by the campus based upon information collected, typically via a survey, on a regular basis from students who are currently enrolled at the campus. Satisfaction questions should cover different aspects of the current program of study and the services provided by the campus to prepare the student for the workforce.

Syllabus. A description of how the course will be taught with a planned arrangement of materials and activities. The minimum requirements for a course syllabus consist of the title and course description, course number, course prerequisites and/or corequisites, instructional contact hours/credits, learning objectives, instructional materials and references, topical outline of the course, instructional methods, out-of-class learning activities and assignments, assessment criteria, method of evaluating students, and the date the syllabus was last reviewed. A course syllabus should be reviewed to ensure that it reflects the most recent trends, developments, and instructional materials for the specific subject areas. A current syllabus prepared and utilized by instructors in guiding and directing the learning experience of the students is necessary to ensure the quality of instruction.

Synchronous Interactions. Teaching/learning interactions between instructors and students which take place in real time or simultaneously through the use of various online technologies. These may include virtual classrooms, audio- or videoconferencing, Internet teleconferences, etc.

T

Term. (1) A calendar unit. (2) Division of the school year during which an educational institution is in session; it may designate the summer term or may be used as a synonym for quarter, school term, semester, or trimester. Historically, a term has been any one of the two or three major periods during which classes were in session, specifically referred to as the fall term, spring term, etc.

Terminal Degree. The highest credential generally available in a discipline, which usually is an earned doctorate such as Ph.D., Ed.D., J.D., or D.B.A. In some disciplines, however, the master's degree is considered the terminal degree. Examples include the M.F.A., M.S.W., and M.L.S.

Threaded Discussions. Online classroom activity in which the instructor may post a series of messages on a particular topic and invite the students to participate in the discussion forum.

Transcript. A copy of the permanent academic (educational) record at an institution of higher education. It becomes an official transcript when the seal of the institution is affixed and the signature of an authorized person is appended.

Two-Year Institution. (1) Literally, an institution of higher education offering the first two years of college-level coursework. (2) In common usage a two-year institution is distinguished from a four-year institution and is characterized by offering at least two, but less than four, years of an organized curriculum. The curriculum may be of the transfer type (with credits normally transferable at full value toward a bachelor's degree).

terminal-occupational, or open-ended. Two-year institutions include junior colleges, technical institutes, and semi-professional schools. In addition to organized curricula, two-year institutions also may offer other types of instruction, e.g., courses in general education and adult education, short courses, and special lectures.

U

Upper-Division Course. Generally, a course that presents more specialized course content, is more rigorous than a lower-division course, and often includes at least one prerequisite. Upper-division courses usually carry course numbers in the 300-499 or 3000-4999 range.

V

Validated Test. A nationally recognized, standardized or industry-developed test which consistently measures what it is designed to measure, e.g., ability of non-high school graduates to benefit from postsecondary education.

Videoconferencing. A teaching/learning activity which uses video and audio signals to communicate with student groups at diverse locations.

W

Webinar. A synchronous online conference in which the teacher or presenter may communicate with students via text, audio, video, electronic whiteboard, and other devices. The event may include listener participation and archived for asynchronous delivery.

Withdrawal. The termination of a student's attendance in a class or in all classes before the end of the term.

**ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS
(ACICS)**

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ARTICLE I

General Provisions and Definitions

Section 1–Name. The name of the corporation shall be the Accrediting Council for Independent Colleges and Schools, which corporation also is referred to herein as “ACICS” or “the Corporation.”

Section 2 Board of Directors. The governance and administration of the affairs of the Corporation shall be vested in a Board of Directors (sometimes referred to herein as the “Board”). The Board shall be constituted as provided in Article II.

Section 3 Council. The Council shall consist of elected and appointed commissioners.

Section 4–Recognition. ACICS shall be the body holding recognition from appropriate recognition bodies.

Section 5–Directors. Directors are those persons serving on the Board of Directors.

Section 6–Commissioners. Commissioners are those persons elected by their peers or appointed by the Council to serve designated terms on the Council.

Section 7–Public Representatives. Representatives of the public are persons who are interested in career education; have knowledge or experience useful to the accreditation process; are willing to contribute opinion, advice, and expertise to the endeavors of ACICS and the Council; and are not (1) employed by an institution or program that either is accredited by the agency or has applied for accreditation; or (2) associated as members of the governing board, owners, shareholders, consultants or in some other similar capacity with an institution or program that either is accredited by the agency or has applied for accreditation; or (3) a member of any trade association or membership organization related to, affiliated with, or associated with the agency; or (4) a spouse, parent, child, or sibling of an individual identified in paragraph (1), (2), or (3) of this definition.

Section 8 Membership. Membership shall be institutional or organizational in nature and shall consist of accredited colleges, postsecondary schools, branches, and other entities, all as defined in the *Accreditation Criteria* of ACICS.

Section 9 Offices. The main offices of ACICS shall be in the Washington, D.C., metropolitan area. ACICS may have other temporary or permanent offices to facilitate its work. The office of the Corporation’s registered agent shall be an office of ACICS.

Section 10–President. The President of the Accrediting Council for Independent Colleges and Schools shall be designated by the Board of Directors and shall be ACICS’s chief executive officer.

ARTICLE II

Board of Directors

Section 1 Composition. The Board of Directors shall be composed of the commissioners and the President. The President shall serve *ex officio* as a member of the Board and shall have no vote.

Section 2–Powers and Duties. Except as otherwise provided by law or in these Bylaws, the Board of Directors shall have the right and responsibility to manage and direct the affairs and exercise the powers of the Corporation. Responsibilities of the Board shall be to:

- (a) provide for an annual certified audit and management letter regarding all financial affairs of ACICS;
- (b) develop and approve an annual budget;
- (c) oversee revenues, expenditures, and investments;
- (d) monitor and coordinate external affairs, including government and consumer concerns;
- (e) assure canons of ethical business operations and personal conduct;
- (f) employ a chief executive officer whose title shall be President;
- (g) conduct an annual meeting of the membership of ACICS;
- (h) facilitate communication and coordination among the commissioners;
- (i) coordinate strategic planning, assess the effectiveness of the strategic plan, and take final action on the strategic plan;
- (j) assess the effectiveness of ACICS in fulfilling its mission and meeting its goals and objectives;
- (k) take all actions necessary to perform required functions of the Corporation; and
- (l) amend the Bylaws as provided for herein.

Section 3—Officers of the Board and Officers of the Council. The officers of the Board of Directors shall be: Chair; Vice Chair; Secretary, and Treasurer. The officers of the Council shall be: Chair and Vice Chair.

- (a) *Chair.* The Chair of the Council shall serve also as the Chair of the Board of Directors. The Chair shall preside over all meetings of the Board and of the Council and is responsible for seeing that policies established and actions taken by those bodies are carried out. The Chair will represent the Board and the Council in their dealings with governmental bodies, the press, and the public, and may sign or approve correspondence and other instruments.
- (b) *Vice Chair.* The Vice Chair of the Council shall serve also as Vice Chair of the Board. The Vice Chair assumes responsibilities as delegated by the Board; in the absence of the Chair, shall serve as Chair of the Board and of the Council; serves as Chair of the Nominating Committee; and shall serve as Chair of the Board and Council in the subsequent year.
- (c) *Secretary.* The Secretary shall be a Director and shall be elected by majority vote of the Directors present and voting at a duly constituted meeting of the Board. The Secretary is responsible for preparing and maintaining custody of the minutes of all meetings of members, the Board, and the Council for the purpose of authenticating the records of the Corporation for each, for giving all notices required in accordance with these Bylaws, for receiving service in legal matters, and for performing all duties customary to the office of Secretary. The Secretary shall have custody of the corporate seal and authority to affix the seal to any instrument requiring it.
- (d) *Treasurer.* The Treasurer shall be a Director and shall be elected by majority vote of the Directors present and voting at a duly constituted meeting of the Board. The Treasurer shall keep or cause to be kept complete and accurate accounts of receipts and disbursements and shall direct the President to ensure deposit of all moneys and other valuable property of the Corporation in such banks or depositories as the Board may designate. The funds, books, and vouchers under supervision of the Treasurer or other delegated persons, with the exception of confidential reports submitted by the members, shall at all times be subject to verification and inspection by the Board. The Treasurer shall serve on the Audit and Investment Committees of the Board of Directors. The Treasurer shall, at the annual meeting of members or by direct mail, report on the financial condition of the Corporation at least once annually.
- (e) *Additional Officers.* The Board may create positions of Assistant Treasurer and Assistant Secretary as necessary for the orderly conduct of business. When so authorized, the President shall appoint individuals from the professional staff to fill such offices and may assign appropriate duties to them. The President shall be responsible for filling all vacancies occurring in these positions.
- (f) *Terms.* Except as otherwise provided in these Bylaws, officers of the Board or the Council shall serve in

office for one (1) year or until election of a successor or, if ex officio, as long as they hold the position which entitles them to serve as an officer of the Board or Council.

ARTICLE III

Council

Section 1–Composition. The Council shall consist of commissioners representing member institutions; commissioners-at-large, and public representatives. It shall be comprised of no more than fifteen (15) commissioners and it shall include at least two academic representatives and at least two administrative representatives. Academic representative is defined as someone currently or recently directly engaged in a significant manner in postsecondary teaching and/or research. Administrative representative is defined as someone currently or recently directly engaged in a significant manner in postsecondary institutional or programmatic administration. At least forty (40) percent of the commissioners shall be public representatives.

Section 2 Powers and Duties. Responsibilities of the Council shall be to:

- (a) promulgate standards of accreditation and establish eligibility conditions, policies, and procedures for accreditation;
- (b) take final action on initial grants of accreditation;
- (c) take final action on denial, suspension, and withdrawal motions;
- (d) provide mechanisms for appeals and dispute resolution to ensure due process in resolution of conflicts between members and the Council;
- (e) provide to members appropriate accreditation-related services such as consultation, accreditation process workshops, and training opportunities for evaluators;
- (f) disseminate information on standards, procedures, and activities;
- (g) monitor compliance with the standards;
- (h) receive and act on other applications;
- (i) issue show-cause directives;
- (j) serve as liaison to recognition agencies or bodies;
- (k) issue a list of accredited colleges, schools, and organizations;
- (l) assess and collect fees from members;
- (m) take final action on the strategic plan; and
- (n) exercise other powers and duties incidental to the foregoing.

ARTICLE IV

Terms, Vacancies, Removal, Resignations, and Compensation

Section 1–Assumption of Office. New commissioners shall assume office on January 1 of the calendar year following election or appointment, unless otherwise provided for by the Council. Incumbent commissioners will remain in office until new commissioners are seated.

Section 2–Terms. The term of service as a commissioner shall be five years. A person appointed to fill a term of less than two and one-half years is entitled to apply for appointment to a full term. Upon completion of a commissioner’s term, the commissioner shall not be eligible to serve another full term until three (3) years have elapsed. However, a commissioner appointment to complete a vacated term, in full or part, is not subject to the three-year (3) waiting period. If nominated, public representatives may serve one additional appointment without

the three-year (3) waiting period.

Section 3–Vacancies. Where a vacancy exists, the Nominating Committee shall review and make recommendations to the Council for its consideration.

Section 4–Resignations. Resignation from service as a commissioner and Director may be voluntarily tendered at any time. The resignation becomes effective upon receipt of written notice by the Chair of the Board and Council or the President. Automatic tendering of resignation is required under the following circumstances or conditions:

- (a) denial, suspension, or revocation of accreditation at the institution with which affiliated;
- (b) cessation or announced cessation of operations at such institution;
- (c) filing for reorganization or bankruptcy by such institution or its parent corporation;
- (d) debarment by the U.S. Department of Education from employment at any institution participating in federal student funding programs;
- (e) indictment for a criminal offense;
- (f) change of control or ownership at the institution with which affiliated;
- (g) failure of such institution to meet its financial obligations to ACICS which results in loss of membership;
- (h) change in employment status (other than internal); and
- (i) the commissioner is employed by an institution that is deemed to be under sustained and serious scrutiny regarding noncompliance with ACICS standards and requirements.

Not all of the foregoing necessarily will result in acceptance of resignation but must be considered by the Council before service can continue.

Section 5–Removal. A commissioner may also be removed by not less than a two-thirds (2/3) vote of the Council for breach of any code, canon, or tenet of ethics formally adopted pursuant to these Bylaws.

Section 6–Compensation. Commissioners shall serve without compensation. Public representatives shall receive honoraria for service in such amounts as the Board shall fix. Commissioners, as well as members of committees, if so provided in advance, shall be reimbursed for expenses incurred in performance of authorized duties.

ARTICLE V

Committees

Section 1 Standing Committees of the Council. There shall be the following standing committees of the Council:

- (a) *Nominating Committee.* The Nominating Committee shall be responsible for the screening of nominees and the selection of candidates for election as commissioners. It also shall identify persons qualified to be appointed as commissioners and recommend them to the Council for appointment. The Nominating Committee shall seek to maintain a Council that is generally representative of the types of member institutions.
 - (1) *Composition.* The Nominating Committee shall be appointed by the Chair of the Council and shall consist of five (5) members, at least four (4) of whom are current commissioners. Members representing both nondegree and degree granting institutions are encouraged. There shall be two (2) representatives from the Executive Committee of the Board of Directors and one (1) person from an ACICS-accredited institution who may or may not be a member of the Council. The Vice Chair of the Council and Board automatically serves as the Chair of the Nominating Committee.
 - (2) *Procedures.* The membership of ACICS shall be notified of the composition of the committee and invited to submit to it names of qualified nominees. The committee in its selection of candidates shall

be mindful of diversity of programs, size and types of institutions, and geographic representation. It shall develop and publish eligibility criteria, permissible campaign practices by candidates, and any special voting procedures. Interviews of nominees by the committee are permitted.

- (b) *Business Practices Committee.* The Business Practices Committee shall consist of commissioners appointed by the Chair of the Council and Board. The mission of the committee is to identify and promote quality business practices of career colleges and schools, to ensure integrity and ethical relations, and to foster cooperation among institutions on behalf of students and others served.
- (c) *Education Enhancement and Evaluation Committee.* The Education Enhancement and Evaluation Committee shall consist of commissioners appointed by the Chair of the Council and Board. The mission of the committee is to establish standards for educational quality that assist institutions in mission fulfillment, program planning and development, institutional evaluation activities, and successful educational outcomes.
- (d) *Financial Review Committee.* The Financial Review Committee shall consist of commissioners appointed by the Chair of the Council and Board. The mission of the committee is to monitor the financial stability of accredited institutions in order to ensure they maintain sufficient financial resources to deliver a quality education to their students.
- (e) *Institutional Effectiveness Committee.* The Institutional Effectiveness Committee shall consist of commissioners appointed by the Chair of the Council and Board. The mission of the committee is to assist institutions in the improvement of their outcomes by establishing and assessing criteria for institutional effectiveness. In order to assist ACICS-accredited institutions to meet established standards, the committee shall review Campus Accountability Reports, Institutional Effectiveness Plans, and institutional outcomes and measurements.

Section 2 Standing Committees of the Board of Directors. There shall be the following standing committees of the Board:

- (a) *Executive Committee.* The Executive Committee shall consist of the Chair of the Board of Directors, who shall serve as Chair of the Executive Committee; the Vice Chair of the Board, who shall serve as Chair of the Executive Committee in the absence of the Chair of the Board; the Secretary; the Treasurer; and additional Directors as the Chair deems necessary, which are elected annually by majority vote of the Board. The Executive Committee acts on behalf of the Board and/or Council during the periods between Board and Council meetings. Accurate minutes of each Executive Committee meeting shall be maintained and shall be provided to the Board of Directors and/or Council at the next subsequent meeting of the Board of Directors or the Council. The Executive Committee's responsibilities shall be: between meetings of the Board and/or Council, act on issues requiring the timely attention of the Board or Council and assume such other duties as the Board of Directors or Council may from time to time delegate to the Executive Committee.
- (b) *Audit Committee.* The Audit Committee shall consist of a minimum of three members of the Board, including the Treasurer, as well as such other members as the Chair appoints. The committee shall work with the President to ensure an annual certified audit of the organization's financial activities is completed, that the findings of the audit are reviewed, and that actions are taken to address recommendations and areas of concern identified as part of the audit process.
- (c) *Investment Committee.* The Investment Committee shall consist of the President, a minimum of three other members of the Board, including the Treasurer, and such other members as the Chair appoints. The Investment Committee shall work with the President to provide oversight of ACICS's investment funds. The Investment Committee shall select investment advisors, develop an investment plan, and review investment reports at least annually.
- (d) *Governance Committee.* The Governance Committee shall consist of commissioners appointed by the Chair of the Council and Board. The mission of the committee is to ensure that ACICS operates within the construct of the Bylaws. The committee will evaluate and make recommendations for modifications to the Bylaws in response to proposed changes in standards or operational policies at ACICS.

- (e) *Board of Ethics.* The Board of Ethics shall consist of three individuals selected by the Board consisting of two independent, public members and one member affiliated with an ACICS institution. The Board will have the authority to review perceived or actual conflicts of interest by a commissioner or Director and decide if the individual is to be directed to resign.

Section 3–Other Committees. The Board of Directors may establish and appoint members to other ad hoc committees as deemed necessary.

ARTICLE VI

Membership, Fees, and Meetings

Section 1–Gaining Membership. Membership in ACICS is voluntary and can only be obtained through accreditation. Members shall be institutions or organizations which provide education or training as heretofore defined. Each main or branch campus is entitled to all of the rights and privileges and assumes all of the obligations of membership as provided in these Bylaws. The term of membership shall be coexistent with accreditation.

Section 2–Loss of Membership. Any member that ceases to be accredited by ACICS shall automatically, and without the necessity for further action, be deemed to be removed from membership. Members may voluntarily resign, which also results in loss of accreditation. All obligations owed to ACICS, including payment of fees, shall be fulfilled prior to resignation. The loss of accreditation shall be retroactive to the date that all outstanding obligations had previously been fulfilled.

Section 3 Types of Fees. There shall be three types of fees: (a) annual sustaining fees, (b) user (or service) fees, and (c) late fees. The annual sustaining fee shall be scaled by formula to the annual educational revenue generated by each member. The user fees shall relate to the cost of services requested or the actions initiated by the members or applicants for membership. The late fees shall be established by the Council.

Section 4–Change in Fees. The Council may adjust the fees annually equivalent to the change in the national Consumer Price Index. Any increase above the CPI percentage shall be presented to the membership for approval.

Section 5–Conditions of Payment. Sustaining fees are due and payable on October 31. The Council may authorize a discount for sustaining fees received by September 30 each year. Nonpayment of annual fees by October 31 subjects a member to automatic loss of membership and loss of accreditation without a hearing. Any request for extension of time to pay or for a periodic payment plan must be received and approved prior to September 30. Payment plans will not extend beyond December 31. Institutions using periodic payment plans shall be assessed an interest rate of one and one-half percent (1.5%) per month on the unpaid balance. User fees must accompany the request for applicable service before the request will be processed.

Section 6–Proration of Fees. A member becoming eligible for membership during the first month of the fiscal year shall pay the full amount of the annual sustaining fees as applicable. Members becoming eligible during succeeding months shall pay a proportionate amount of the otherwise applicable fee as determined by the number of months remaining in the fiscal year, including the month in which membership is attained.

Section 7 Other Costs. In addition to fees herein described, costs of visits conducted by the Council will be invoiced to the institution.

Section 8–Assessments. The Council, upon a majority vote, may propose an assessment in addition to the annual sustaining fees provided for in this Article where there has occurred or is impending an emergency which may impair the ability of the Council to achieve its purposes and the amount of annual dues is insufficient to meet the Council's requirements. The proposed assessment shall be submitted to the members for approval or disapproval on majority vote.

Section 9 Annual Meeting. A meeting of the members shall be held annually at a date and place to be determined by the Board of Directors. The purpose of such meeting shall be the receipt of reports on the budget and finances of ACICS and its activities and affairs, and the transaction of other business as may be specified by the Board in the call for and notice of the meeting. The meeting may combine these business purposes with informational and educational sessions; meetings of the Board, the Council, commissions, or committees; and special events for the members.

Section 10 Special Meetings. Special meetings of the members may be called by the Board of Directors upon request of a majority of the Board or upon petition to the Board by not fewer than the lesser of fifty (50) members or ten percent (10%) of the membership not under common ownership or control.

Section 11–Notice of Meetings. Normally, members shall be notified at least thirty (30) days in advance of the date, location, time, and purpose of all meetings of the members. Waiver of notice may be recorded at any special meeting of the members by majority vote of a quorum present at such meeting.

Section 12–Quorum. Twenty percent (20%) of the members eligible to vote and represented by Designated Delegates shall constitute a quorum at a meeting of the members for the transaction of business, except that any issue not properly noticed in the call for the meeting and that requires membership-wide participation may not be acted upon under new business. The Board of Directors may adopt such procedures as it deems necessary for the conduct of business. In the absence of an established procedure, Robert’s Rules of Order shall apply.

Section 13–Meetings of the Council. The Council shall convene as often as necessary to review materials attendant to the accrediting process and to take formal action on the accredited status of applicants.

ARTICLE VII

Appeals Process

Section 1–Review Board of Appeals. A Review Board of Appeals shall be appointed by the Council. The purpose of the Review Board shall be to review, according to pre-established procedures and guidelines, appeals by members of final negative actions by the Council and in each case either to affirm the action of the Council, to remand the case to the Council for further review, or to amend or overturn the action. The Review Board shall consist of fifteen (15) persons, all of whom have had experience in accreditation. The Review Board shall include at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members, as defined in Article III, Section 1 herein. Review Board panels will consist of a minimum of three (3) members and be comprised of at least one (1) public, one (1) academic, and one (1) administrative representative. Members of the Review Board shall be appointed to terms of three years, with terms of initial appointees staggered so that one-third of the terms expire each year. A person appointed to the Review Board shall not have been a commissioner within one year prior to appointment. The President shall convene timely a panel of the Review Board when necessary.

Section 2–Due Process. Criteria promulgated by the Council shall ensure that institutions are provided a fair and reasonable opportunity to present reasons 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 an appeal to the Review Board, pursuant to the procedures described in 2-3-604. All appeals to the Review Board of Appeals shall be on the record and shall provide for the submission of briefs and oral testimony by institutional representatives.

ARTICLE VIII

Miscellaneous

Section 1 Liability. No applicant, member, or former member shall be liable for the debts of ACICS in any

amount except to the extent of the fees required of each member pursuant to Article VI, Sections 3 and 8, hereof.

Section 2—Corporate Seal. The corporate seal shall be in such form as may be approved by the Board of Directors.

Section 3—Checks, Notes, Contracts. The Board of Directors shall determine the persons who will be authorized on the Corporation's behalf to sign checks, drafts, or other orders for payment of money; to sign acceptances, notes, or other evidences of indebtedness; to enter into contracts; or to execute and deliver other documents and instruments. These persons (positions) will be designated in the Board approved Governance Policy Document. The Board of Directors shall, at its discretion, require officers, agents, employees, and other persons so authorized pursuant to this Section to give security for the faithful performance of their duties.

Section 4—Books and Records. The Corporation shall keep at its office correct and complete books and records of the accounts and transactions of the Corporation and a current list of the members, directors, and officers of the Corporation. Such books and records may be in written form or in any other form capable of ready conversion to written form.

Section 5—Confidentiality. The Council shall maintain the confidentiality of the accrediting process with members insofar as permitted by accrediting criteria, law, and regulation. The Council shall have written policies on disclosure of information to third parties.

Section 6—Indemnification and Insurance. The Corporation shall indemnify and hold harmless each director, officer, commissioner, member of an appeals board, member of a visiting team, agent, employee, or other person acting on behalf of the Corporation or the Council against and from all loss, cost, and expense reasonably incurred by such person in the payment, defense, or settlement of any claim, suit, or proceeding brought against such person because they acted as part of or on behalf of ACICS, the Council, or the Review Board, as a director, officer, commissioner, member of an appeals board, member of a visiting team, agent, or employee. The rights specified in this Section shall apply whether or not persons continue to act in such capacity at the time the loss, cost, or expense is incurred. Such rights shall not apply in relation to any matters as to which any such person shall be finally adjudged to be liable for willful misconduct. The Board of Directors also may authorize the purchase and maintenance of insurance on behalf of such persons and the Corporation against any liability that arises from their actions in such capacities.

Section 7—Amendments. The Bylaws of the Corporation may be amended by the Board of Directors by majority vote of all the directors.

Section 8—Dissolution. ACICS shall use its funds only to accomplish the objectives and purposes set forth in these Bylaws, and no part of said funds shall inure or be distributed to the members of ACICS. On dissolution of ACICS, any funds remaining shall be distributed to one or more regularly organized and qualified charitable, educational, scientific, or philanthropic organizations to be selected by the Board of Directors.

Section 9—Fiscal Year. The fiscal year of ACICS shall be July 1 through June 30.

Section 10—Limitation of Liability. In any claim, cause, or action of any kind by any applicant for membership, member, or former member against ACICS, ACICS' liability is limited solely to reimbursement of any application or membership fees paid by said applicant for membership, member, or former member during the calendar year in which any such claim, cause, or action is initiated. ACICS shall not be liable to any applicant for membership, member, or former member for any direct, indirect, incidental, special, consequential, or any other type of damages, including but not limited to lost profits, nor shall ACICS be liable for any other person's or party's attorneys' fees or costs associated with any claim, cause, or action against ACICS. This limitation of liability applies to any and all liability or causes of action however alleged or arising to the fullest extent permissible by law.

ARTICLE IX

Litigation, Jurisdiction and Venue, and Expenses

Section 1—Suits Against ACICS, Jurisdiction, and Exhaustion of Administrative Remedies. Jurisdiction and venue of any suit, claim, or proceeding relating to membership, accreditation, or accredited status, whether a claim for damages or injunctive or declaratory relief, brought by an accredited member, former member, or applicant for membership and accredited status against ACICS, the Council, the Review Board, or a commissioner, officer, committee member, Review Board member, or staff member acting in his or her official capacity shall only be in the U.S. District Court for the Eastern District of Virginia, Alexandria Division, or the Circuit Court for the City of Alexandria, Virginia. Accredited members, former members, and applicants must exhaust all administrative remedies provided for in the ACICS Criteria and Bylaws before initiating any suit, claim, or proceeding in Court.

Section 2—Reimbursement of ACICS's Litigation Expenses. An applicant for membership, member, or former member of ACICS shall reimburse ACICS for all costs and expenses (including attorney's fees) actually and reasonably incurred by ACICS in defending any suit, claim, or proceeding, whether for damages or for injunctive or declaratory relief, brought by an applicant, member, former member, or one or more present or former students of any of the foregoing against ACICS, the Council, the Review Board, any commissioners of the Council, or members of the Review Board, or officers, employees, or agents of ACICS, the Council, acting in their official capacity, where ACICS, the Council, the Review Board, the commissioner, officer, employee, or agent shall have been adjudged to be the prevailing party in the suit, claim, or proceeding.

Section 3 Other Expenses. Each member shall reimburse ACICS for all costs and expenses (including attorney's fees) incurred by it in the production of any of the Corporation's, or the Council's, records relating to such member in response to lawful requests from parties in litigation or from state or federal agencies.

Section 4—Binding Effect.

- (a) Each existing member and new member of ACICS shall be provided with a copy of these Bylaws. Acceptance or continuation of membership in ACICS shall constitute each member's agreement to be bound by the provisions of these Bylaws, as they may be amended from time to time, while a member of and subsequent to the termination of membership in ACICS.
- (b) Each applicant for membership in ACICS shall be provided with a copy of these Bylaws. Application for membership in ACICS shall constitute such applicant's agreement to be bound by the provisions of these Bylaws, as they may be amended from time to time, regardless of whether such applicant becomes a member of ACICS.

UNANNOUNCED VISIT FACT SHEET

The Council, at its discretion, may direct an unannounced visit to occur at an institution about which it has received adverse information or when general operations of the institution may be called into question. This Fact Sheet is designed to assist the institution and the visiting team in conducting this visit as smoothly and efficiently as possible.

VISIT PROCEDURES

The purpose of this visit is to review records, interview students and staff, and, if applicable, review previously cited problem areas and verify responses to previous requests for information, such as complaints. The team may consist of a staff member, an experienced evaluator, or both. Expect the team to spend the full day at your institution.

Upon arrival, the team will ask to speak with the chief on-site administrator. Following a brief interview, the team is to be given a short tour of the facility, including records storage areas, and then shown to a work room. This room could be an empty classroom or office, and it should be available exclusively for the team for the entire visit.

The institution must make the following information available to the visiting team:

1. the most recent Campus Accountability Report;
2. the current catalog and addenda (if applicable);
3. the current class schedule, including names of instructors and room numbers;
4. the most recent ACICS accreditation visit team report and institutional response;
5. a copy of each government program review and compliance audit conducted within the prior two years and any institutional responses;
6. faculty/personnel records;
7. all student records, including admissions, academic, and financial; and
8. copies of institutional advertising.

Additional records may be requested by the team. Staff, faculty, and students will be interviewed. Institutions are encouraged to have these records in a central location where more than one person can access them, should the chief on-site administrator not be present.

REPORT AND SUBSEQUENT ACTIONS

A report will be prepared and sent to the institution for response. If the institution is found to be operating in accordance with the *Accreditation Criteria*, no further action will be taken.

If the institution is found to be violating provisions of the *Accreditation Criteria*, the Council may direct the institution to show cause why its accreditation should not be withdrawn, or it may direct that a full team visit the institution to evaluate its correction of these violations.

EXIT CONFERENCE

At the conclusion of the visit, the team will meet with the chief administrator to discuss the visit and to answer any questions regarding the Council policies, procedures, and standards.

FEES

A fee will not be assessed for this visit. Failure to remit payment for this fee may result in an adverse action.

INSTITUTIONAL PARTICIPATION

Any institution that refuses to undergo an on-site unannounced visit evaluation will be directed to show cause why its accreditation should not be withdrawn by suspension.

This Appendix includes the Council's criteria for institutional publications, including catalogs, advertising literature, and other published documents describing the institution.

CATALOG

The Council requires all accredited institutions and all applicant institutions to publish an acceptable catalog. An accredited institution with branch campuses may publish a common catalog, but it should be specific as to the faculty, programs, and student services available at each location (see Multiple-Campus Catalogs in this Appendix). All enrolled students must have access to the current catalog.

A catalog is written for many purposes and is directed toward a varied audience. The catalog becomes an announcement and a record and should be dignified in appearance. It must not be primarily a promotional publication, nor should it be directed toward a single segment of its varied audience. The catalog has been determined by the courts to be a legal document of the institution concerned.

The catalog should explain the offerings and services of an institution, but it should not glorify or extol. It should reflect the dignity and integrity of the institution it describes. The catalog must be available in hard copy and may also be available in a read-only electronic format. The hard copy catalog must be appropriately printed and bound. The catalog may include illustrations and photographs that are pertinent to the institution.

At a minimum, the catalog shall contain the following items:

1. A table of contents and/or an index.
2. An indication, on the front cover or on the title page, of the year or years for which the catalog is effective.
3. The names and titles of the administrators of the institution.
4. A statement of legal control which includes the names of trustees, directors, and officers of the corporation.
5. If the institution is now accredited, a statement denoting this fact. (See Statement of Accreditation in this Appendix.)
6. A statement of the mission of the institution.
7. A list of the full-time faculty members that shows the following:
 - (a) academic credentials held;
 - (b) institutions awarding the credentials; and
 - (c) the area of teaching specialization.
8. An academic calendar (calendar of events) showing beginning and ending dates of terms, quarters, or semesters; holidays; registration dates, etc.
9. The full disclosure of the institution's admission requirements, policies, and procedures, including the basis for admissions, test requirements, advanced standing requirements, and experiential learning assessment requirements.
10. A statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and, if applicable, a list of institutions with which the institution has established articulation agreements (see Section 3-1-413).
11. A statement on the transferability of the credits in the programs that are offered (see Section 3-1-413).
12. A description of the contracts or agreements and the services to be provided if the institution has entered into an agreement with an accredited institution, an agreement with an unaccredited institution, or an

international partnership agreement (see Sections 2-2-504, 2-2-505, 2-2-506, and 2-2-507 for additional information).

13. A statement of the curricula (programs) offered, including for each:
 - (a) a statement of the objective or purpose of the curriculum;
 - (b) an accurate and complete listing of the courses included in each curriculum, each with a unique identifying number and title;
 - (c) the credit or clock hours awarded for each subject;
 - (d) the total credits or clock hours required for satisfactory completion of the curriculum;
 - (e) requirements for certification, licensing, or registration in the program career field, as appropriate; and
 - (f) any additional or special requirements for completion (such as practica or externships).
14. A description of each course (subject) offered including:
 - (a) identifying number;
 - (b) title;
 - (c) credit or clock hours awarded;
 - (d) a complete but concise description of the contents of the course; and
 - (e) prerequisites, if any.
15. An explanation of the grading or marking system (consistent with that appearing on the student transcript).
16. A definition of the unit of credit. If credit hour, identify whether quarter or semester. (See Section 3-1-516 for additional information.)
17. An explanation of standards of satisfactory progress. (See Section 3-1-420 for additional information.)
18. A description of the certificates, diplomas, and/or degrees awarded, together with a statement of the requirements to be met in each instance.
19. A statement of the tuition, fees, and all other regular and special charges.
20. A complete and accurate listing of all scholarships offered. (See Section 3-1-431.)
21. A statement of the institution's refund policy and formula relative to the method of financial obligation. This policy must be clearly outlined and must comply with Sections 3-1-433 and 3-1-434.
22. A statement pertaining to the nature and extent of student services offered (e.g., counseling and placement).
23. A grievance procedure that includes the name and address of ACICS, unless the grievance procedure is published in a student handbook.
24. If the institution offers degrees, the catalog must include the following information:
 - (a) for occupational associate's degree programs, identification of courses that satisfy the general education requirement and an explanation of the course numbering system;
 - (b) for academic associate's degree programs, identification of courses that satisfy the general education and concentration requirements and an explanation of the course numbering system;
 - (c) for bachelor's degree programs, identification of upper-division courses and courses that satisfy the general education and concentration requirements and an explanation of the course numbering system; and
 - (d) for post-baccalaureate or graduate degree programs (master's and doctoral degree programs), a separate section in the catalog describing the program requirements, admissions procedures, transfer policies, graduation requirements, regulations, and course descriptions. (See Sections 3-6-800 and 3-7-800.)

25. If the institution offers courses via distance education, the catalog must include the following information:
- (a) a description of each mode of distance education delivery method used;
 - (b) the admission requirements for the courses or program(s) of study offered through distance education required only if different from the admission requirements for the residential programs;
 - (c) a description of tests used in determining access to distance education courses and programs, if applicable;
 - (d) a description of the resources and equipment the students must have to avail themselves of the instruction (including, computer requirements such as hardware and software, internet access, access to library/college for monitoring of examinations, etc.); and
 - (e) the special costs and fees associated specifically with distance education (e.g., platform access fees, on-line library access fees, purchase of books on-line).
26. If the institution is approved by the Council to offer direct assessment competency-based program(s), the catalog must include the following information:
- (a) a clear identification and listing of direct assessment competency-based program(s);
 - (b) a concise and clear description of how such programs are structured and administered; any special admissions requirements; how students will be expected to demonstrate achievement of competency goals; the types of academic and student services offered to assist students to pass the assessments; and how student achievements will be shown on the academic transcript;
 - (c) disclosure of the number of equivalent credit hours or clock hours and the general methodology the institution uses to determine the equivalencies;
 - (d) a clear description of how financial aid will be administered and disbursed for eligible students enrolled in such programs;
 - (e) disclosure of other entities or qualified individuals, in addition to the institution's faculty, engaged in the direct assessment process; and
 - (f) disclosure of the consequences or options available to students if they fail to demonstrate achievement of competency goals within a prescribed period of time.

ADDENDA/SUPPLEMENT TO THE CATALOG

Listing of administrative staff and faculty, tuition and fees, and academic calendar may be included in a catalog addendum/supplement as standing items. In addition, the addendum/supplement may include other reasonable changes that occur after a catalog has been printed until the next printing. An institution is expected to update its catalog at an appropriate interval and the addendum/supplement should not be used as a substitute for meeting this expectation.

The addendum/supplement must clearly state that it is part of the catalog and must include the school name, location, and effective date for the entire document (or for individual sections if effective dates vary). The addendum must be included with each copy of the catalog.

MULTIPLE-CAMPUS CATALOGS

1. Pictures of the physical facilities of any of the institutions must be captioned to identify the particular campus depicted.
2. Faculty and administrative staff must be listed in the catalog and be clearly identified for each campus. The administrative staff of the institution also must be listed.
3. Any information contained in the catalog that is not common to all campuses in the group shall be presented in such a manner that no confusion, misunderstanding, or misrepresentation is possible.
4. The catalog must comply with the existing standards in all respects as outlined in these Guidelines.

ADVERTISING

Any advertisement or promotional literature written or provided by an institution through any type of media shall be completely truthful and dignified. The material shall be presented in a manner which avoids leaving any false, misleading, or exaggerated impressions with respect to the institution, its personnel, its courses and services, or the occupational opportunities for its graduates. An English translation for advertising that is in a language other than English must also be available.

1. All advertising and promotional literature provided by an institution must clearly indicate that training or education, and not employment, is being offered.
2. All advertising and promotional literature must include the correct name of the institution. So-called "blind" advertisements are not permitted.
3. Institutions advertising to attract students in classified columns of newspapers or the equivalent on websites and other electronic publications must use only classifications such as "Education," "Schools," and "Instruction." Headings such as "Help Wanted," "Employment," and "Business Opportunities" may be used only to procure employees for the institution.
4. Testimonials used in advertising must reflect the opinions or experience of a current or prospective student or graduate of the institution. Testimonial messages must be factual and portray current conditions. They cannot contain any representations that would be deceptive or could not be substantiated by the institution. The institution must maintain a written release from the individual providing the testimonial on file.
5. An institution shall not use the words "free" and "guarantee" for advertising or marketing purposes in a manner that is misleading to prospective or current students.
6. An institution shall not offer monetary incentives to the general public to visit, enroll in, attend, or complete a program. The institution cannot make guarantee or similar claims regarding job placement or salary for graduates.
7. References to financial aid availability must use the phrase "for those who qualify." Financial aid cannot be the sole source of an advertisement.

PERFORMANCE INFORMATION DISCLOSURE

In its disclosure of student achievement data (as required under Section 3-1-704), the following disclosure statement must be included:

"These are the data reported to ACICS by the institution in its most recent Campus Accountability Report."

STATEMENT OF ACCREDITATION

When making public disclosure of accredited status in its catalog, the institution must include the name, address, and telephone number of ACICS.

For institutional catalogs, the fact of accreditation shall be stated only as follows:

"Accredited by the Accrediting Council for Independent Colleges and Schools to award (name all applicable specific credential levels from among certificates, diplomas, associate's degrees, bachelor's degrees, and master's degrees)."

Institutions may add the following statement in announcing their accreditation:

"The Accrediting Council for Independent Colleges and Schools is recognized as a national accrediting agency by the Council for Higher Education Accreditation."

For publications and advertising other than catalogs, institutions that wish to state the fact of accreditation shall use either the catalog language noted above or one of the following disclosure statements:

“Accredited by the Accrediting Council for Independent Colleges and Schools” or “Accredited Member, ACICS”

An institution is not permitted to use such statements as “fully accredited” or “accredited” without including the name of ACICS. An institution will not use or publicize the term “accredited” unless it is in fact accredited by ACICS or another recognized agency, or it has affirmative authority under state law. Any reference to stated authority for status as “registered,” “approved,” or “accredited” must include the name of the state extending the approval and must accurately identify the state agency. An applicant for ACICS accreditation may not disclose this fact in any manner.

For electronic media and websites, the institution may provide a hypertext mark-up language link (“html”) to the ACICS website when making public disclosure of its accredited status. Disclosure must be in compliance with Appendix C.

An essential element in providing appropriate instruction and support services to students is monitoring their satisfactory academic progress (SAP). The Council requires all institutions to develop a policy of satisfactory academic progress that measures whether students are maintaining satisfactory academic progress in their educational program.

SATISFACTORY ACADEMIC PROGRESS POLICY FOR INTERNATIONAL INSTITUTIONS

Institutions located outside the United States, which serve students not participating in the U.S. Title IV student financial assistance programs, are required to publish in the catalog an SAP policy and systematically monitor academic progress of their students. At a minimum, the SAP policy must address the following elements: (a) minimum qualitative standards, such as a grade point average, which must be achieved by the end of each academic year or at 50% of the normal program length if the program is less than one academic year; (b) maximum time frame in which the educational objectives must be successfully completed; (c) a rationale if the maximum time frame for program completion exceeds 150% of the normal program length; (d) institutional procedures for a systematic monitoring of each student's progress in meeting the SAP policy; (e) a description of actions that must be taken by the institution if the student fails to make satisfactory academic progress; and (f) a minimum cumulative grade point average of 2.0, C, or their equivalent that must be achieved by each student upon graduation.

The Council has determined that the institutional policy must include the following requirements, which are consistent with the regulations specified by the U.S. Department of Education for student eligibility for receiving Federal Title IV financial assistance.

1. The institution has written standards and a schedule of satisfactory academic progress for all students, which are published in the catalog and appropriate institutional literature and are consistently applied to all students.
2. The institution strictly adheres to its published standards of satisfactory academic progress, monitors whether a student meets the minimum qualitative and quantitative components of the standards, and notifies students when satisfactory academic progress is not being made.
3. The standards of satisfactory academic progress provide for minimum qualitative standards, such as a grade point average or completion of work projects, which can be measured against a norm.
4. The policy defines a maximum time frame, not to exceed 150% of the normal program length, as defined by the institution, for all programs, in which the educational objective must be successfully completed (e.g., number of academic years, credit hours attempted, clock hours completed, months/weeks, terms or modules, as appropriate), as opposed to simply setting a time limit on eligibility for Title IV financial aid.
5. The institution has provisions for an evaluation point at least by the end of each academic year (or at 50% of the normal program length if the program is one academic year or less) that determine whether the student has met the qualitative and quantitative components of the standards.
6. The institution has provisions for utilizing and publishing a schedule designating the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete the educational program within the maximum time frame.
7. The institution has provisions for determining at the end of each increment whether the student has met the qualitative and quantitative components of the standards. The qualitative and quantitative standards must be cumulative and must include all periods of the student's enrollment regardless of whether or not the student receives federal financial aid.

8. The institution's policies define the effect on satisfactory academic progress of course withdrawals, incomplete grades, repeated courses, and non-punitive grades. The institution's policies define the effect of non-credit or remedial courses on satisfactory academic progress.
9. The institution has provisions for an evaluation at the end of the second academic year and at the end of each subsequent academic year, at which point the student must have a minimum cumulative grade point average (CGPA) of 2.0 on a scale of 4.0, C, or their equivalent, or has academic standing consistent with the institution's requirements for graduation. A student receiving federal financial aid who does not meet the CGPA standards at the end of the second year will no longer be eligible for financial aid, may not be placed on probation, and must be dismissed, unless the student wishes to continue without being eligible for federal financial aid. However, a student not meeting the CGPA standards at the end of the second year may remain as an enrolled student who is eligible for federal financial aid if there are documented mitigating circumstances (i.e., death in the family, sickness of the student).
10. If the institution places students on warning or probation, as defined in sections 11 and 12 below, the institution's policy must describe these statuses.
11. An institution that evaluates academic progress at the end of each payment period may assign warning status to a student who fails to make satisfactory academic progress. A student may be assigned to warning status without an appeal or other action by the student. For institutions awarding U.S. Department of Education Federal Financial Aid, a student on warning may continue to receive assistance under federal financial aid programs for one payment period despite a determination that the student is not making satisfactory academic progress.
12. The institution must have an appeal process for students who do not meet the requirements of the institution's satisfactory academic progress policy. When an institution grants a student's appeal for mitigating circumstances, the student will be placed on probation for a specified period of time and considered to be making regular satisfactory progress. While a student is on probation, the institution may require the student to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses.

If a student is not making satisfactory academic progress, the institution may place the student in an extended enrollment status. However, all credits attempted count toward the 150% of the normal program length even if the student is on extended enrollment. Grades may be replaced if that is the institution's written policy. At the discretion of the institution, a student with an approved appeal who exceeds one and one-half times the standard time frame as defined by the institution either as a regular student or in an extended enrollment status may receive the original academic credential for which he or she enrolled, provided that there are no additional financial obligations to the student.

For institutions awarding U.S. Department of Education Federal Financial Aid Only: A student on probation will have their eligibility for financial aid reinstated. A student on probation may receive federal financial aid funds for one payment period. At the end of one payment period on probation, the student must meet the institution's satisfactory academic progress standards or meet the requirements of the academic plan developed by the institution and the student to qualify for further federal financial aid funds. A student placed in an extended enrollment status is not eligible for financial aid.
13. The institution must have clearly defined procedures for re-establishing satisfactory academic progress.
14. The institution has rules for students who change programs, as well as for students who seek to earn additional credentials. For instance, an institution may have a policy that for a student who changes programs it will include in the determination of a student's satisfactory academic progress standing the credits attempted and grades earned that count toward the student's new program of study. Such a policy must be part of the institution's written policy.
15. The institution must have a policy that addresses the implications of transfer of credit on satisfactory academic progress.

16. The institution has provisions that the student must have a minimum CGPA of 2.0, C, or their equivalent for undergraduate programs and 3.0, B, or their equivalent for graduate programs upon graduation. For approved professional graduate programs, which require attainment of specified competencies and a licensure or certification, the institution has published and consistently follows an appropriate SAP policy.
17. If the institution is approved to offer direct assessment competency-based programs, the institution must demonstrate that it has implemented appropriate policies that describe how it will measure whether a student enrolled in a competency-based program is making satisfactory academic progress. Policies and procedures must be implemented to identify in a timely manner when a student enrolled in such a program has withdrawn or changed enrollment status. The institution must maintain for Council review evidence that financial aid officers and others assigned to monitor satisfactory academic progress have been trained and are adequately monitored for implementing policies affecting competency-based programs.

In evaluating institutionally funded student aid, ACICS will consider the characteristics listed below. These characteristics are not listed in any priority order. Any institution whose aid program is not in accordance with any or all of these characteristics may be subject to a compliance warning. The greater the number of these characteristics evident in an institution's grant program, the greater the presumption of acceptability. ACICS will, however, review each institutional grant program in its entirety.

1. Grants are made from segregated funds or from identifiable funds which have been provided for in the institution's operating budget.
2. The percentage of students receiving institutionally funded grants, as compared to the overall student population of the institution, is not inordinately high.
3. The total amount for institutionally funded grants is publicly and clearly identified prior to the beginning of the academic year or term.
4. Institutionally funded grants may be awarded on the basis of student need or standards describing similarly circumstanced students.
5. The amount of institutionally funded grants is not based solely on the difference between the tuition charged and the amount of federal or state financial aid received.
6. The tuition charged reasonably and closely represents the cost to the institution of the instruction provided and does not significantly vary in amount from similar or same instruction in another certificate or degree program.
7. The amount of tuition retained as nonrefundable by the institution from those students who drop out prior to the end of the academic term or period is proportionally allocated between the institutionally funded grants and the federal and state financial aid received by the student.
8. The type and amount of institutionally funded needs-based grants is determined by an independent selection or review panel.

This appendix consolidates information regarding the Council's requirements for institutions offering stand-alone ESL programs and/or ESL coursework as part of a Title IV-eligible program, and federal requirements for the awarding of financial aid.

The following information is intended to combine the highlights of the ACICS requirements and federal regulations noted above and should assist institutions in understanding Council criteria for offering stand-alone ESL programs and the major differences between Council requirements and federal regulations for these ESL programs. Additionally, an overview of federal guidelines for ESL coursework offered within an eligible program is included.

SEPARATELY ELIGIBLE, STAND-ALONE ESL PROGRAMS**Council Requirements**

The requirements for reporting information on separately-eligible ESL programs are the same as for all other programs. The institution must immediately notify ACICS when these programs are initiated, changed, or discontinued. An on-site evaluation with an appropriate subject specialist will be required when a new ESL program is initiated, and may be required when the program is changed.

The objective of stand-alone ESL programs is to enhance the English-language proficiency of individuals who have pre-existing vocational knowledge, training, or skills, but cannot use that knowledge, training, or skill because of their English-speaking deficiency. No vocational training is provided in a stand-alone ESL program.

In order to receive approval from ACICS to provide stand-alone ESL programs, the institution shall:

1. Adhere to the stated mission of the program when developing the curricula;
2. Administer, at entrance and exit, a nationally recognized exam of English comprehension (e.g., Test of English as a Foreign Language, Test of Spoken English.)
3. Provide documentation that all admitted students are enrolled in accordance with Section 3-1-303.
4. Verify or assess at entrance, with supporting documentation, that the enrolling student already has knowledge, training, or skills in a vocational field, unless the student is enrolled solely to obtain ESL competency unrelated to a vocation (also a Department of Education regulation.)
5. Describe the placement services, if any, to be offered to graduates of the ESL program. Institutions are not required to include these graduates in their placement statistics.
6. Employ degreed faculty who have prior experience in this field of instruction.
7. Involve faculty in professional organizations and workshops enabling them to meet the special needs of the ESL student.

Department of Education Regulations

The institution must provide information or documentation that the program:

1. Consists solely of ESL instruction.
2. Admits only undergraduate students who it determines need ESL to use already existing knowledge, training, or skills.
3. Meets the other program and institutional eligibility requirements including:
 - (a) that it leads to a degree or certificate,

- (b) that it is at least a one-year program at a public or private nonprofit institution of higher education, or a six-month program at a postsecondary vocational institution or a proprietary institution of higher education,
- (c) that it admits as regular students only persons who have a high school diploma or the recognized equivalent (GED) or who are beyond the age of compulsory school attendance in the state in which the institution is located and have the ability to benefit from the training offered,
- (d) that it is legally organized by its state to offer the ESL certificate or degree program,
- (e) that it is approved by the school's nationally recognized accrediting agency or association, or that it meets one of the statutory alternatives to accreditation, and
- (f) if it is a credit-hour program, that it meets any applicable state and accrediting agency requirements governing the use of credit hours.

NOTE: ESL is an eligible program only for purposes of the Pell Grant Program.

ESL COURSES AS PART OF AN ELIGIBLE PROGRAM

Council Requirements

Conversion from clock to credit hour for the ESL courses must be appropriate and in compliance with Department of Education regulations for remedial coursework.

Department of Education Regulations

ESL coursework required by a student when accepted into an existing, Title IV-eligible program must be considered remedial in nature for the purpose of calculating student financial aid. Note that remedial coursework is by regulation either noncredit or reduced credit, for purposes of the postsecondary program, although these noncredit or reduced academic credit hours are converted to the credit value of non-remedial courses for the purpose of calculating Title IV payments to students.

It is important to remember that a program of study must be Title IV-eligible excluding the remedial courses (i.e., for a 300 clock-hour Hospitality and Tourism program to be eligible for student loan programs, any remedial courses offered must be added to the 300 clock hours).

SUMMARY

ACICS members currently offering or planning to offer stand-alone ESL programs or ESL as remedial courses taken with an eligible program must be aware of and in compliance with all Council requirements and Department of Education regulations. In comparing the two, it is apparent that if an institution is not in compliance with the Department of Education, it will not be in compliance with ACICS because all of the Department's requirements are inherent to the *Accreditation Criteria*; ACICS is, however, more restrictive in several areas.

Be advised that compliance with Appendix F does not ensure that a program will be determined by the U.S. Department of Education to be eligible for Title IV participation. Should the institution desire Title IV funding for an ESL program, it should discuss program eligibility with the appropriate Department of Education regional office before applying for Council approval.

These guidelines are designed to inform institutions of the policies of the Council and to guide staff in disclosing information and providing materials to third parties regarding an institution's accreditation. Many policies are required by federal law and regulation.

The policies presented below are not intended to cover every situation, and the Council exercises considerable discretion in balancing the need for confidentiality in the accreditation process with the need to disclose information to the public, including students and student applicants, and to other interested third parties, including government agencies. The Council will provide information requested by the U.S. Department of Education that may bear on an institution's compliance with federal student financial aid requirements, including the eligibility of the institution to participate in Title IV programs. (See Title II, Chapter 3, for additional information.)

1. The Council maintains and makes available to member institutions, appropriate governmental agencies, and the public complete information regarding its accreditation criteria, policies, and practices; the institutions that it currently accredits, including the dates when the institutions are scheduled to be reviewed for renewals of accreditation; and the names, educational backgrounds, and professional qualifications of its commissioners and senior administrative staff. This information is provided in written documents available from the Council office or on the Council's website. These documents include a directory of accredited institutions and an annual report, copies of which are forwarded automatically to the U.S. Department of Education, state regulatory agencies, and other recognized institutional accrediting agencies.
2. The Council will notify the U.S. Department of Education, state regulatory agencies, other accrediting agencies, other interested third parties, and the public of all Council actions that affect an institution's grant of accreditation, institutional closings, and voluntary withdrawal or expiration of accreditation within 30 days.

In the case of the public, however, the Council will provide written notice of the decisions listed below within 24 hours of its notice to the institution:

- (a) a final decision to place an institution on show-cause or equivalent status; and
- (b) a final decision to deny, withdraw, suspend, revoke, or terminate the accreditation of an institution.

Deferral actions will include an explanation that the institution's application is pending and that additional information has been requested. Negative actions subject to appeal will be denoted with a statement that the action is subject to appeal and is not final unless the institution does not exercise its appeal rights or until the institution's appeal rights have been exhausted. The disclosure of Review Board decisions will be in accordance with the procedures described in Section 2-3-607. The Council retains the discretion and the responsibility to communicate other relevant accreditation information with appropriate agencies and regulatory bodies.

3. Within 60 days of a final negative action, the Council will also make available to the agencies above and the public upon request, a brief statement summarizing the reasons for the negative action determination and the official comments that the institution may wish to make with regard to the Council's decision, or evidence that the affected institution has been offered the opportunity to provide official comment.
4. Through written, established protocols, the Council will directly, and in a timely manner, inform the U.S. Department of Education of any institution which the Council has reason to believe is failing to meet its Title IV program responsibilities or is engaged in fraud and abuse, along with the Council's reasons for concern about the institution.

Further, the Council will make such notification if it believes the institution demonstrates systemic noncompliance with respect to use of the Department's definition of credit hour or significant noncompliance regarding conformity with commonly accepted practice in the assignment of credit hours

to one or more programs at the institution. The institution will then be given an opportunity to provide evidence demonstrating it is in compliance with Title IV requirements regarding credit hour assignments.

5. The Council will notify the public through its website and other means, as appropriate, of the following:
 - (a) at least one year in advance of grant expirations, a list of all institutions with current grants of accreditation due to expire; and
 - (b) as soon as practical, a list of all institutions which have applied for initial grants of accreditation.

This notification will include guidance on how third parties may comment on these institutions' qualifications for accreditation.

6. The Secretary of Education's grant of recognition constitutes a "grant of authority" to the Secretary to conduct site visits (both to ACICS and to the institutions) and to gain access to agency records, personnel, and facilities on an announced and unannounced basis.
7. The Council automatically will submit an annual report to the Secretary of Education.
8. The Council will provide information regarding debarment actions on request.

APPENDIX H PRINCIPLES AND REQUIREMENTS FOR NONTRADITIONAL EDUCATION

SECTION I

DIRECT ASSESSMENT COMPETENCY-BASED PROGRAMS

Programs that are designed to prepare students for a specific profession or career are especially suited to be offered as direct assessment competency-based programs because such programs focus on what the students need to know, understand, or be able to do. The process utilized for the development of the curriculum, expected competencies, and ways to directly assess such competencies and equate them to credit hours or clock hours (as required by the United States Department of Education as well as by the Council) demands active involvement of employers, as appropriate, and other experts in the discipline. Potential benefits gained by such programs are as follows:

- Allow students to progress at their own pace, but in compliance with the institution's satisfactory academic progress policy;
- Allow flexibility to motivated students;
- May potentially shorten the time for completion of the program;
- May potentially reduce overall cost of education; and
- May foster creativity for the institution, faculty and students in exploring cost-effective pathways to complete a program.

FEDERAL DEFINITION OF DIRECT ASSESSMENT COMPETENCY-BASED PROGRAMS

A direct assessment program is an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program utilizing the results of the assessment.

Direct assessment of student learning means a measure by the institution of what a student knows and can do in terms of the body of knowledge making up the educational program. These measures provide evidence that a student has command of a specific subject, content area, or skill or that the student demonstrates a specific quality such as creativity, analysis or synthesis associated with the subject matter of the program. Examples of direct measures include projects, papers, examinations, presentations, performances, and portfolios.

ACICS GLOSSARY

Using the Federal definition as a guide, the Council has developed expanded definitions for Competency-based Programs and Direct Assessment Competency-based Programs. A longer list of examples of "direct" assessment measures is given in the Glossary. "Indirect" assessment measures, while deemed valuable for assessing institutional and program effectiveness, are not included in the consideration for the approval of competency-based programs.

For consideration of eligibility to participate in Title IV Federal Student Aid Programs, the Department of Education will consider only direct assessment competency-based programs.

PROCESS FOR REVIEW, APPROVAL, AND QUALITY MONITORING VISITS

Proposed initiation of a direct assessment competency-based program is classified as a substantive change and requires Council review and approval.

Institutions must submit Part I of the Application for Direct Assessment Competency-based Program, along with required supporting documents, for a preliminary review and Council action. A separate application is required

for each program. The guidance document and instructions accompanying Part I of the application are designed to guide the institutions in gaining an idea of the types of direct assessment methods that are strongly recommended for professional and career-focused programs. The principles and requirements included in this Appendix will be applied in reviewing the application.

In considering the application, the Council will determine if the institution has demonstrated that it has used a rigorous process to identify what the student or graduate must know and be able to do to be considered “competent” by employers and experts in the field or discipline. In addition, the institution has demonstrated that it has developed robust direct assessment techniques and has explicitly described how it determines the equivalent number of credit or clock hours for the program.

Upon approval of Part I of the application by the Council, the institution will apply to the U. S. Department of Education for Title IV approval of the proposed direct assessment competency-based program.

Part II of the Application for Direct Assessment Competency-based Programs must be submitted to ACICS at least three months prior to the effective start date of the program. The approval letter will provide instructions on at least two quality monitoring on-site visits to the institution. The first visit will be conducted within six months of the start of the program and a second follow-up visit will be conducted between 12 to 18 months of the start of the program, depending upon the credential level of the program.

INSTITUTIONAL MISSION AND INSTITUTIONAL READINESS

- (a) The basis for the introduction of direct assessment competency-based programs must support the mission and objectives of the institution.
- (b) The structure and objectives of the program must clearly demonstrate that a systematic process was utilized in identifying and defining specific competencies related to the program. The process shall include participation of representation from employers, experts in the field, faculty, alumni, and faculty.
- (c) The Campus Effectiveness Report must include a discussion of the proposed direct assessment competency-based programs, including the rationale, overall structure, anticipated direct assessment methods engaged, plans for assessment and continuous improvement of the program, and adoption of best practices in competency-based education.

ADMISSIONS REQUIREMENTS AND ENROLLMENT

Eligibility requirements for admission to direct assessment competency-based programs must be clearly defined, published, and consistently applied. The institution is expected to develop objective mechanisms and standards for determining the potential characteristics of students who are best suited to pursue and complete the program.

CURRICULUM DEVELOPMENT AND DIRECT ASSESSMENT MEASURES

- (a) In the development of the curriculum, institutions must organize each course to enable students to clearly understand measurable learning objectives. Whenever possible, the Council encourages institutions to utilize standardized tests and industry-recognized licensure or certification examinations as direct assessment of student learning. Multiple direct assessment methods, which are student-centered, must be utilized where appropriate.
- (b) The syllabus for each course must be expanded to include clear learning objectives, student competency expectations, direct assessment techniques utilized by the faculty, criterion-based rating scales or rubric scores where appropriate, and the institution’s systematic methods for determining credit hour or clock hour equivalencies. The syllabus must also clearly state how the student’s progress will be monitored and how the final grades will be recorded.

FACULTY AND INSTRUCTIONAL SUPPORT

Maximum support of the program faculty is essential to develop and implement this student-centered program. The institution must demonstrate that the faculty members are provided proper training, in-service, and professional development activities to support this program. A rationale for faculty-student ratios must be developed. Adequate technology support must be provided as appropriate for faculty to monitor student progress and competency achievements.

STUDENT SUPPORT SERVICES

- (a) The institution must demonstrate that it offers strong student support services to assist students in achieving their competency goals. Mentors and student counselors must be trained to provide suitable support.
- (b) The institution must have a definite pathway for competency-based program students who may be advised to transition to a traditional fixed-schedule, teacher-directed format.
- (c) Academic advisors, registrars, career counselors, and financial aid counselors must be provided special training to provide support to the direct assessment competency-based program students.

UTILIZATION OF EXTERNAL ENTITIES AND EXPERTS

- (a) If appropriate, the institution may utilize external entities and experts in providing a portion of the direct assessment competency-based program. The scope and nature of their involvement must be clearly outlined in a formal contract. The institution must demonstrate that it has sufficient academic control for the development and monitoring of the program. The contract must be approved by the Council prior to implementation.
- (b) If external entities and experts are utilized, the institution's faculty must provide more than 50 percent of the direct assessments of the competency-based program.

CONTINUOUS PROGRAM ASSESSMENT AND IMPROVEMENT

The institution must have adequate plans for the continuous assessment of the effectiveness of the program and provide for continuous improvement. These plans must be described in the Campus Effectiveness Plan.

PUBLICATIONS

Full and accurate disclosure of an approved direct assessment competency-based program must be provided in the institution's catalog and website. The catalog disclosure must follow the requirements as described and outlined in Appendix C.

SECTION II

DISTANCE EDUCATION

In addition to the general standards in Title III, Chapter 1, which apply to all institutions, and applicable standards in Chapters 2 through 6, the following standards apply specifically to distance education delivery methods. These principles and guidelines are designed to inform institutions of the policies of the Council and to guide institutional representatives when designing, implementing, and evaluating distance education forms of educational delivery.

INSTITUTIONAL READINESS

- (a) Institutions must notify and receive approval from ACICS prior to using distance education as a mode of delivery. (See Section 2-2-106.)
- (b) Institutions must have a plan to implement distance education instruction. At a minimum, the plan should include the rationale, resources, course/program objectives, content, and student assessment. Institutions must integrate this plan into the Campus Effectiveness Plan.

- (c) The instructional delivery method must be appropriate for students and the curriculum.
- (d) Institutional policies and procedures should be consistently applied using procedures that are appropriate to the mode of delivery.
- (e) Institutions must designate a qualified individual to oversee the distance education activities.

ADMISSIONS REQUIREMENTS AND ENROLLMENT

- (a) Institutions must identify the admission requirements of distance education courses and/or programs and how they differ from, if applicable, the on-ground admission requirements.
- (b) If an online admissions test is required, it must be administered in a manner which verifies the student's identity. Institutions must make it clear in writing at the time of enrollment how the student's identity will be verified throughout the course and program, how the student's privacy will be protected, and if the student will be assessed any additional charges associated with the verification of student identity.
- (c) Institutions must clearly and appropriately state any requirements the students must possess or have access to in order to access this mode of delivery.
- (d) Institutions must provide an online orientation program to familiarize the student with the equipment and resources used in the distance education activities and to orient the student to the distance education learning process.

CURRICULUM AND INSTRUCTIONAL DELIVERY

- (a) Regardless of the instructional delivery method, the syllabi must identify the course learning objectives. Each course learning objective must support one or more program learning outcomes. (See Glossary definition of Syllabus.)
- (b) The course must provide sufficient and appropriate opportunities for interaction between faculty and students and among students.
- (c) Institutions must demonstrate to the Council that the clock or credit hours required and awarded are appropriate for the degrees and credentials offered using a thoroughly developed rationale. Credit award rationales for distance education delivery of courses or programs generally do not use the traditional lecture/laboratory/externship formulas for credit calculations (See Section 3-1-516, Course and Program Measurement).
- (d) Curriculum must be administered in a way that maintains security of access.
- (e) Institutions must demonstrate that the student who registers for a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit. The verification method, at the option of the institution, may include a secure login and pass code, proctored examinations, and other appropriate student authentication or verification technology.

FACULTY AND INSTRUCTIONAL SUPPORT

- (a) The institution must employ academically and/or experientially credentialed faculty to teach online courses appropriate to the subject matter.
- (b) Faculty hired to facilitate online instruction must be properly trained to utilize the institution's learning management system for purposes of instruction, communication, and assessment.
- (c) The instruction must provide an accessible and reliable learning management system and technical support to effectively facilitate online instruction and learning.
- (d) The institution must demonstrate that the student/teacher ratio appropriately supports faculty and student interaction, facilitation of interaction among students and interaction with curriculum content.
- (e) The institution must have a faculty development plan on file that is appropriate for each individual. For

further information, see Section 3-1-543.

RESOURCES AND EQUIPMENT

- (a) The institution must demonstrate that it has adequate financial resources to support the form of delivery.
- (b) The institution must demonstrate that students taking online courses have access to the same or equivalent library resources and support as students taking courses in a physical classroom. If 50% or more of the student's program is approved for online delivery, these resources must include at a minimum access to a virtual library collection of program-related books, journals, and periodicals and access to virtual library and information technology services.

STUDENTS AND STUDENT SERVICES

- (a) The institution must orient online students to its learning management system, resources, and support services, including technical support.
- (b) Student support services available to students enrolled in online programs must be the same or equivalent to those provided to students enrolled in ground-based programs, including but not limited to student services such as counseling, academic advising, financial aid, and employment assistance.

STUDENT EVALUATION AND PROGRAM ASSESSMENT

- (c) The course learning objectives for a course delivered online must be the same as the learning objective for the same course delivered on ground.
- (d) Regardless of instructional delivery method, assessments and assignments should demonstrate student achievement of course learning objectives.
- (e) The institution must document that it conducts course/program evaluations, including assessment of student learning outcomes; student retention and placement; and student, graduate, faculty, and employer satisfaction. (See Section 3-1-111.)

PUBLICATIONS

- (a) The institution must fully disclose what form(s) of instruction it uses in its catalog and website and, when appropriate, in its advertising and promotional material. The catalog disclosure must follow the requirements as described and outlined in Section 3-1-701 and Appendix C.

SECTION III

SELF-PACED INSTRUCTION

In addition to the general standards in Title III, Chapter 1, which apply to all institutions, and applicable standards in Chapters 2 through 6, the following standards apply specifically to self-paced instruction delivery methods. These principles and guidelines are designed to inform institutions of the policies of the Council and to guide institutional representatives when designing, implementing, and evaluating self-paced instruction forms of educational delivery.

INSTITUTIONAL READINESS

- (a) Institutions must notify and receive approval from ACICS prior to using self-paced as a mode of delivery. (See Section 2-2-106.)
- (b) Institutions must demonstrate a shift from a teacher-centered to a learner-centered environment.
- (c) Institutions must employ faculty who possess the technical skills to teach in a self-paced environment.
- (d) The delivery method must be appropriate for students and the curriculum.

ADMISSIONS REQUIREMENTS AND ENROLLMENT

Institutions must identify the admissions requirements of self-paced courses and/or programs.

CURRICULUM CONTENT AND INSTRUCTION AND DELIVERY

- (a) Regardless of the instructional delivery method, the syllabi must identify the course learning objectives. Each course learning objective must support one or more program learning outcomes. (See Glossary definition of Syllabus.)
- (b) Institutions must demonstrate to the Council that the clock or credit hours required and awarded are appropriate for the degrees and credentials offered using a thoroughly developed rationale. Credit award rationales for distance education delivery of courses or programs generally do not use the traditional lecture/laboratory/externship formulas for credit calculations. (See Section 3-1-516, Course and Program Measurement.)
- (c) Institutions must demonstrate compliance with applicable federal and state regulations.

FACULTY AND INSTRUCTIONAL SUPPORT

- (a) The institution must employ academically and/or experientially credentialed faculty to oversee the self-paced course/program.
- (b) The faculty must be adequately trained to instruct in a self-paced environment.
- (c) The faculty must be supported with the appropriate education resources and technology to facilitate self-paced instruction.
- (d) The institution must demonstrate that the student/teacher ratio appropriately supports faculty and student interaction, facilitation of interaction among students, and facilitation of student interaction with curriculum content.

RESOURCES AND EQUIPMENT

The institution must provide an accessible and reliable learning management system and technical support to effectively facilitate online instruction and learning.

STUDENTS AND STUDENT SERVICES

- (a) The institution must orient online students to its learning management system, resources, and support services, including technical support.
- (b) Student support services available to students enrolled in self-paced programs must be the same or equivalent to those provided to students enrolled in ground-based programs, including but not limited to student services such as counseling, academic advising, financial aid, and employment assistance.

STUDENT EVALUATION AND PROGRAM ASSESSMENT

- (a) The course learning objectives for a self-paced course must be the same as the learning objectives for the same course delivered on ground.
- (b) Regardless of the instructional delivery method, assessments and assignments should demonstrate student achievement of course learning objectives.

PUBLICATIONS

The institution must fully disclose what form(s) of instruction it uses in its catalog and website and, when appropriate, in its advertising and promotional material. The catalog disclosure must follow the requirements as described and outlined in Section 3-1-701 and Appendix C.

APPENDIX I PRINCIPLES AND GUIDELINES FOR INTERNATIONAL PARTNERSHIP AGREEMENTS

In addition to the general standards in Section 2-2-507; Title III, Chapter 1, which apply to all institutions, and applicable standards in Title III, Chapters 2 through 7, the following standards apply specifically to institutions proposing to initiate an international partnership agreement with an entity outside the United States or its territories.

The programs and/or courses offered abroad must be consistent with the institution's educational mission and goals and must meet the same academic standards, educational effectiveness and student achievement.

These principles and guidelines are designed to inform institutions of the policies of the Council and to guide institutional representatives when designing, implementing, and evaluating an International Partnership Agreement (IPA).

The partnership agreement should include the following items and detail each entity's responsibility in the following areas:

ELEMENTS IN AN INTERNATIONAL PARTNERSHIP AGREEMENT

I. Duration and Jurisdiction.

1. Institutions must identify the start and end date of the agreement.
2. The agreement must list the signatories/partners involved in the international partnership.
3. The agreement must describe under which jurisdiction(s) the agreement will legally be bound, i.e. legal jurisdiction of the ACICS institution.

II. Administration of the International Partnership Activity.

1. Institutions must identify the individual with the overall responsibility for the activity.
2. Institutions must identify the on-site administrator for the activity.

CURRICULUM CONTENT, INSTRUCTION, AND DELIVERY

Institutions shall ensure the quality and rigor of the courses/program offered through the international partnership agreement.

III. Faculty and Instructional Support.

1. Institutions must employ academically and experientially credentialed faculty to oversee the instruction, evaluation, and grading requirements of the courses/program.
2. Institutions must have faculty credentials evaluated by a recognized service for evaluation of foreign credentials.
3. The faculty must be supported with the appropriate education resources and technology.

IV. Admissions Procedures and Requirements. The institution must identify the admission requirements for enrolling in courses/programs abroad.

V. Students and Student Services.

1. Advising and Counseling
 - (a) Institutions must provide academic advising and counseling services to students.
 - (b) Institutions must have procedures for adding and dropping courses.

2. Financial Aid

If applicable, institutions shall detail the institution's procedure for awarding, disbursing, and counseling students on financial aid funds that will be used for overseas study.

3. Transfer of Credit

Institutions must be in compliance with Section 3-1-413 as it relates to transfer of credit.

4. Student Orientation

The institution must provide pre-departure orientation and on-site orientation programs for students, if applicable.

5. Grievance Procedure

A grievance policy and procedure must be included in the catalog and list the name and address of ACICS, unless it is published in a student handbook.

6. Student Records

The institution must provide a plan for storing student records and providing access to the on-site administrator at the international location.

7. Student Accommodations

Institutions should detail the plan for arranging student accommodations during the study abroad period, if applicable.

VI. Security.

1. Institutions must describe student, staff and faculty safety at the international education facility will be ensured.
2. Institutions must describe the plan to ensure the security of students, staff, and faculty in case of civil unrest or natural disaster in the host country.

VII. Financial Requirements. Institutions must be in compliance with Section 3-1-430 as it relates to financial aid, tuition, and charges.

VIII. Resources and Equipment. Instructional resources and equipment must be readily available, accessible, and reliable.

IX. Student Evaluation and Program Assessment. The institution must implement an assessment plan that measures attainment of core competencies for courses and/or programs and measurable objectives for each course.

X. Publications. The institution must fully disclose what form(s) of instruction it uses in its catalog and website, and when appropriate, in its advertising and promotional material. The catalog disclosure must follow the requirements as described and outlined in Section 3-1-701 and Appendix C, Number 22.

XI. Termination of Agreement and Teach-out Plan. Institutions must detail the plan for completion of programs or courses should an international partner fail to provide services.

XII. International Site Facilities. Institutions must include a description of facilities at the international site and provide evidence that the facilities are in compliance with host country building code regulations.

Summary

ACICS members planning to enter into an international partnership agreement must be aware of and in compliance with all Council requirements and Department of Education regulations.

APPENDIX J PRINCIPLES AND GUIDELINES FOR PROGRAM ENHANCEMENT EDUCATION AND STUDY ABROAD ACTIVITIES

International demands for postsecondary education provide opportunities for member institutions to expand the geographic footprint of their education delivery infrastructure, through online, on-ground, combinations of those, and other modalities. Regardless of the education delivery infrastructure utilized at an international location, the institution is expected to operate in compliance with ACICS standards as demonstrated through direct monitoring of administrative operations, instruction, student services, and the comparable full array of processes that apply to all institutions accredited by ACICS.

The standards and guidelines below will be applied to institutions that offer education or study abroad activities at international locations under the ACICS grant of accreditation. They are designed to apply Council expectations for effectiveness and integrity to programs that primarily lead to employment in professional, technical, and occupational fields, regardless of the geographic location of the education or study abroad activity, or the modality with which the education is delivered. Council acknowledges education or study abroad may serve to enhance the interpersonal and developmental aspects of the student, including an improved ability to relate to and work with people from different cultures and ethnic, linguistic, and national backgrounds. Council also acknowledges that education or study abroad, as part of a comprehensive career education program, may be directly applicable to the workplace and contribute to a graduate's success in finding placement in an organization with a multinational employee profile that utilizes multinational vendors and suppliers. Finally, the Council authorizes the utilization of education or study abroad under the parameters prescribed in this section in recognition that structured education or study abroad may enhance the graduate's ability to compete for job placement with international employers.

A key principle of ACICS standards regarding education or study abroad is that the accredited institution must demonstrate that the quality of the education derived from locations outside of a student's home country is comparable to that received at its domestic accredited locations. The burden of proof lies with the institution, regardless of the form of education or study abroad.

1. **Education or Study Abroad Activities:** For all education or study abroad activities, other than those performed through a formal partnership agreement with an international institution, a U.S.-based institution is required to host a comprehensive Forum review and provide the final determination letter demonstrating substantial conformity with the Forum's standards, contained in the document, "Standards of Good Practice for Education Abroad (SGPEA)", published by The Forum on Education Abroad (<https://forumea.org/wp-content/uploads/2014/08/Standards-2015.pdf>); the requirements for maximum length of study as defined in #2 (below); and the academic residency requirement as described in #3 (below). For those education or study abroad activities performed through a formal partnership agreement, the IPA requirements apply (see section 2-2-510 and Appendix I). International institutions accredited by ACICS located outside the U.S. that are planning to initiate education or study abroad activities must disclose the nature and scope of such activities in writing to ACICS and seek prior approval.
2. **Maximum of Length of Education or Study Abroad Activity:** No more than 50 percent of a program's coursework may be completed through education or study abroad activities, including transfer credit, challenge examinations, and other sources. An education or study abroad program may not exceed an equivalent of two semesters in length.
3. **Academic Residency:** Students admitted to an education or study abroad program are those who must have satisfactorily completed a minimum of one full-time equivalent semester, quarter, or trimester online or on site through the home institution. Additionally, education or study abroad students are required to complete a minimum of one full-time equivalent semester, quarter, or trimester online or on-site through the home institution following completion of the education or study abroad activity and prior to completion of the credential.

APPENDIX K REQUIREMENTS AND GUIDELINES FOR THE CAMPUS EFFECTIVENESS PLAN (CEP)

This Appendix identifies the Council's requirements for the content of a written Campus Effectiveness Plan (CEP) document. The CEP should provide information about the campus and how it measures and evaluates key elements of its operations in order to continuously improve its overall educational operations and meets its mission and objectives. The Council requires each campus to have a current CEP available that meets the requirements identified in this Appendix.

A main and branch campus may use similar language, format, and general content in CEPs, where appropriate. However, the CEP for each main and branch campus must also include information and data specific to its own campus including the characteristics and demographics of the current student population; the number of students enrolled in each program; campus and program retention, placement, graduation rates; results of surveys to determine current student, graduate, and employer satisfaction; and student learning outcomes.

For those campuses offering programs in non-traditional modes of delivery, the distance education plan must be integrated into the CEP and the elements evaluated to include the effect of the modality on overall outcomes. Further, the campus must also incorporate its assessment of faculty satisfaction into its plan.

EVALUATION OF ELEMENTS IN THE CAMPUS EFFECTIVENESS PLAN (CEP)

The CEP shall, at minimum and at both the campus and program levels, report outcomes for each of the elements listed below. For each element, at the campus and program levels, as appropriate, baseline rates and levels for comparison and goals for the current evaluation period must be identified. A summary and analysis of previous performance, a rationale for the baseline rates and levels, goals, and a listing of activities that will be undertaken to achieve the goals must also be included.

1. Retention rates.
2. Placement rates.

Student retention and graduate placement rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for at least one reporting period. The data and information reported for retention and placement rates must demonstrate that the campus is maintaining or improving performance each year or, if that is not the case, then the campus must provide an explanation of mitigating circumstances affecting improved outcomes. In accordance with Section 2-1-809, a specific plan to improve the retention and/or placement rate(s) for each program not meeting current Council standards for retention and/or placement must be included within the CEP.

3. Graduation Rates

Graduation rates are based on scheduled to graduate cohort for each program offered at a campus. The graduation rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for at least one reporting period.

4. The level of current student satisfaction.
5. The level of graduate satisfaction.
6. The level of employer satisfaction.

The level of satisfaction for each of the three elements identified above shall be determined and reported at least twice a year. For each of these three elements, the CEP must identify and describe what types of data were used to determine the level of satisfaction, how they were collected, and the target group's

response rate. Graduate satisfaction should be evaluated no sooner than 30 days following and within 6 months after graduation and include both placed and non-placed graduates.

7. Student learning outcomes (SLOs).

Measuring and evaluating achievement of the SLOs are among the most important activities available to validate and confirm overall program and campus effectiveness. SLOs should be appropriately selected to reflect the nature of the academic programs offered and must include direct assessments but may also include indirect measurements (see Glossary definitions of Direct and Indirect Assessment). For campuses that offer programs for which licensure or certification is required to practice in the specific career field, pass rates shall be evaluated as a required student learning outcome.

IMPLEMENTATION AND MONITORING OF THE CAMPUS EFFECTIVENESS PLAN (CEP)

Each campus shall systematically maintain progress reports on a periodic basis as defined by the campus but no less than two times during the CEP year that document completion of activities and changes in data and information for each of the CEP elements. Activities, as described in the reports, are to be specific and measurable.

In addition to the periodic progress reports, each campus is required to conduct a comprehensive evaluation of its plan at the end of the CEP year and to incorporate the results of that evaluation into the next year's CEP, as appropriate. The next year's CEP should contain a narrative section describing or explaining the consideration and, if applicable, the incorporation of the previous year's outcomes in the formulation of the new document.

APPENDIX L STUDENT ACHIEVEMENT STANDARDS AND CAMPUS ACCOUNTABILITY REPORTS

INTRODUCTION

ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and student success outcomes. Student learning outcomes involve assessment of skill and competency attainment, including licensure or certification examination pass rates, where applicable. Student success outcomes include student retention or persistence and employment or placement.

Section 2-1-809 of the *Accreditation Criteria* requires periodic Council review of student achievement data, verified both by the institution as well as by the Council, submitted by the campus in the annual Campus Accountability Report (CAR) as required under Section 2-1-801. Appendix L provides an overview of the Council's student achievement standards and Council actions that will be taken if the student achievement data show that a campus or program is out of compliance with these standards.

STUDENT ACHIEVEMENT STANDARDS

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure or certification examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure or certification examinations where applicable, and find appropriate employment.

Campus-Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard	Benchmark*
Retention Rate	60%	70%
Placement Rate	60%	70%
Program-Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard	Benchmark*
Retention Rate		
• Program length equal to or less than one (1) year	60%	70%
• Program length equal to or more than one (1) year	60%	65%
Placement Rate	60%	70%
Licensure Examination Pass Rates, where applicable**	60%	70%

*A campus and/or program whose rates fall below the Benchmark must develop and implement an Improvement Plan.

**Standards apply to programs for which licensure or certification is required to practice in the specific career field. The program is required to meet any higher licensure or certification agency standards.

DATA COLLECTION AND VERIFICATION OF DATA INTEGRITY

As required under Standard 2-1-801, each main campus and each branch campus must submit an annual Campus Accountability Report (CAR). These reports are due on or before November 1 annually. The CAR reporting year is July 1 to June 30. Placement is accepted through November 1 of the CAR reporting year. Based on the student-by-student data submitted by the campus, the Council calculates the various student achievement rates. All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness (see Standard 3-1-203). In addition to the Council review of data on an annual basis, placement information is reviewed via monthly submissions, and all CAR data is subject to review and verification at any time, including during an on-site evaluation visit.

STUDENT ACHIEVEMENT REVIEW AND COUNCIL ACTIONS

The Council reviews student achievement data for each campus on an annual basis and takes appropriate action. The Council reserves the right to take prompt adverse action once a campus and/or program is found out of compliance and will exercise its judgment in applying the guidelines outlined below:

Year Reporting	Rates	Campus and/or Program Status*	Council Directed Activities
Current Submission**	60-69.9%	Reporting	<ul style="list-style-type: none"> • Development and implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (<i>campus- and/or program-level</i>) • Attendance at ACICS's Retention and Placement Workshop (<i>campus-level</i>)
	50-59.9%	Compliance Warning	<ul style="list-style-type: none"> • Institutional review before the Council • Development and implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (<i>campus- and/or program-level</i>) • Submission of a partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period (<i>campus and/or program-level</i>) • Submission of all communication and reporting with the oversight agency on licensure or certification performance (<i>program-level licensure/certification</i>) • Submission of updated licensure/certification information as provided by the oversight agency, or a reliable third-party, or as collected and compiled by the campus with supporting backup documentation (<i>program-level licensure/certification</i>)
	Below 49.9%	Show-Cause	<ul style="list-style-type: none"> • Institutional Review before the Council

Year Reporting	Rates	Campus and/or Program Status*	Council Directed Activities
			<ul style="list-style-type: none"> • Submission of a corrective action plan to the Council along with documentation of implementation and effectiveness(<i>campus- and/or program-level</i>) • Submission of a partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period (<i>campus and/or program-level</i>) • Notification of its status to its current and prospective students on its website, internal student communication system, and appropriate admissions forms and reference materials (<i>campus- and/or program-level</i>) • Submission of a prepared campus closure plan and/or program termination plan that includes an audit of students currently enrolled along with a plan for teach out (<i>campus and/or program level</i>) • Submission of all communication and reporting with the oversight agency on licensure/certification performance (<i>program-level licensure/certification</i>) • Submission of updated licensure or certification information as provided by the oversight agency, or a reliable third-party, or as collected and compiled by the campus with supporting back up documentation (<i>program-level licensure/certification</i>)
	*	Adverse Action	<ul style="list-style-type: none"> • Submission of a Campus Closure Application with a teach-out plan and agreements (campus level) • Institutional review before the Council (campus and/or program level) • Submission of a Program Termination Application with teach-out or transfer-out agreements (program level) • Immediate cessation of new enrollment (program level)
	50-59.9%	Show-Cause	<ul style="list-style-type: none"> • Institutional review before the Council

Year Reporting	Rates	Campus and/or Program Status*	Council Directed Activities
Following Year 1			<ul style="list-style-type: none"> • Submission of a corrective action plan to the Council along with documentation of implementation and effectiveness (campus and/or program level) • Submission of a partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period (campus and/or program level) • Notification of its status to its current and prospective students on its website, internal student communication system, and appropriate admissions forms and reference materials (campus and/or program level) • Submission of a prepared campus closure plan and/or program termination plan that includes an audit of students currently enrolled along with a plan for teach out (campus and/or program level) • Submission of all communication and reporting with the oversight agency on licensure or certification performance (program-level licensure/certification) • Submission of updated licensure or certification information as provided by the oversight agency, or a reliable third-party, or as collected and compiled by the campus with supporting back up documentation (program-level licensure/certification)
	Below 49.9%	Adverse Action	<ul style="list-style-type: none"> • Submission of a Campus Closure Application with a teach-out plan and agreements (<i>campus-level</i>) • Institutional Review before the Council (<i>campus and/or program-level</i>) • Submission of a Program Termination Application with teach-out or transfer-out agreements (<i>program-level</i>) • Immediate cessation of new enrollment (<i>program-level</i>)
Following Year 2	Below 59.9%	Adverse Action	<ul style="list-style-type: none"> • Submission of a Campus Closure Application with a teach-out plan and agreements (<i>campus-level</i>)

Year Reporting	Rates	Campus and/or Program Status*	Council Directed Activities
			<ul style="list-style-type: none"> • Institutional Review before the Council (<i>campus and/or program-level</i>) • Submission of a Program Termination Application with teach-out or transfer-out agreements (<i>program-level</i>) • Immediate cessation of new enrollment (<i>program-level</i>)

* If the Council deems an institution or program significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance within the maximum time frame, it will take an adverse action. If Council judges that the institution or program can come into compliance within the maximum time frames specified in Title II, Chapter 3, Introduction, it will take action appropriate to the circumstances such as compliance warning or show-cause directive.

**For any institution or program that receives a compliance warning or show-cause directive, the institution must come into compliance within the time frames specified in Title II, Chapter 3, Introduction (i.e. an institution whose longest program is less than one year in length has a time frame of twelve months to come into compliance).

^ A program show-cause directive or compliance warning is not a negative or conditioning action and is therefore not appealable. It is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards.

DESCRIPTION OF STUDENT ACHIEVEMENT REVIEW ACTIONS

Immediate Adverse Action: The Council reserves the right to take immediate adverse action if the institution or one of its campuses is significantly out of compliance with the Council standards with little or no chance of coming into compliance within the maximum time frame. An adverse action for an institution is a withdrawal by suspension of the institution's accreditation, or withdrawal of inclusion of the branch campus's approval within the accredited status of the institution. An adverse action for a program is the withdrawal of the program's approval, except for teach-out purposes for the currently enrolled students. An institution, in accordance with Section 2-3-403(a), will be allowed the opportunity for a review before the Council prior to the execution of an adverse action.

Withdrawal by Suspension or Withdrawal of Program Approval: If an institution or one of its campuses does not come into compliance within the time frames specified by a compliance warning or show-cause directive, then the Council will issue a withdrawal by suspension of the institution's accreditation, or withdrawal of inclusion of the branch campus's approval within the accredited status of the institution.

If a program does not come into compliance within the time frames specified by a compliance warning or show-cause directive, then the Council will issue a withdrawal of program approval and the institution will be required to immediately cease new enrollments and terminate the program.

Show-Cause: The show-cause directive is an action by which the Council determines that the campus and/or program is materially out of compliance and provides the institution an opportunity for a review before the Council concerning the deficiencies identified. The campus must submit evidence to the Council of the corrective actions planned and implemented to improve performance and come into compliance within one year. Further, the campus must prepare a campus closure and/or program termination plan. In addition, the campus and/or program must provide notification of its status to all current and prospective students. If the show-cause directive is as a

result of licensure or certification examination pass rate performance, the campus must also provide updated pass rate information and all communication from the oversight agency concerning the monitoring of its performance.

Compliance Warning: A campus and/or program on compliance warning is required to evaluate, analyze, and if necessary, revise the Improvement Plan implemented while on student achievement reporting. The Council reserves the right to request the submission of the evaluation and analysis of the Improvement Plan for review. The campus will be given the opportunity for a review before the Council to provide evidence of improvement at the campus and/or program levels. As a result of being found out of compliance, the campus and/or program must come in to compliance within the time frame specified in Title II, Chapter 3, Introduction.

Reporting: If a campus and/or program reports student achievement retention or placement rates or program-level licensure or certification examination pass rates between 60-70%, it is considered on student achievement reporting. The campus and/or program is required to show improvement and must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must identify the factors negatively impacting the student achievement outcome, the specific activities to be implemented or being implemented to address the deficiency, and an analysis of any changes realized since its implementation. This plan will be reviewed during any on-site evaluation visit.

Data Collection and Verification: ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council reviews campus- and program-level retention and placement rates and program-level licensure or certification examination pass rates where licensure or certification is required for employment in the state the campus is located. The CAR reporting year is July 1 to June 30, and placement is accepted through November 1 of the CAR reporting year.

Please refer to Campus Accountability Report (CAR) Guidelines and Instructions for details regarding online submission of the annual report, instructions, types of information collected, and calculation formulas.

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Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-4



RENEWAL OF ACCREDITATION VISIT REPORT

BRIGHTWOOD COLLEGE
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Kaplan Professional Schools
Saint Paul, MN 55108
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September 21-22, 2106

Dr. Darlene Ann Minore	Chair, Facilities	Minore Educational Strategies, LLC, Former Director of Compliance at Bainbridge Graduate Institute	Bainbridge Island, WA
Ms. Alison Roope	Student-Relations Specialist	Charter College Campus Care, Director of Compliance	Phoenix, AZ
Ms. Maria MacMeekin	Educational Activities	Liberty University & Stratford University, Professor and Instructional Mentor	Richmond, VA
Dr. Louise Wilcox	Distance Education	Former Campus President for American Institute College of Health Professions	Niantic, CT
Dr. Thomas Evans	Data Integrity Review, Applied Business Fundamentals Specialist	St. Petersburg College, Professor of Business	Largo, FL
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Ms. Katie Morrison	Staff Representative	ACICS	Washington, DC

Maria L. MacMeekin, ID, MS

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RENEWAL OF ACCREDITATION VISIT REPORT

RIDLEY-LOWELL BUSINESS & TECHNICAL INSTITUTE
116 Front Street
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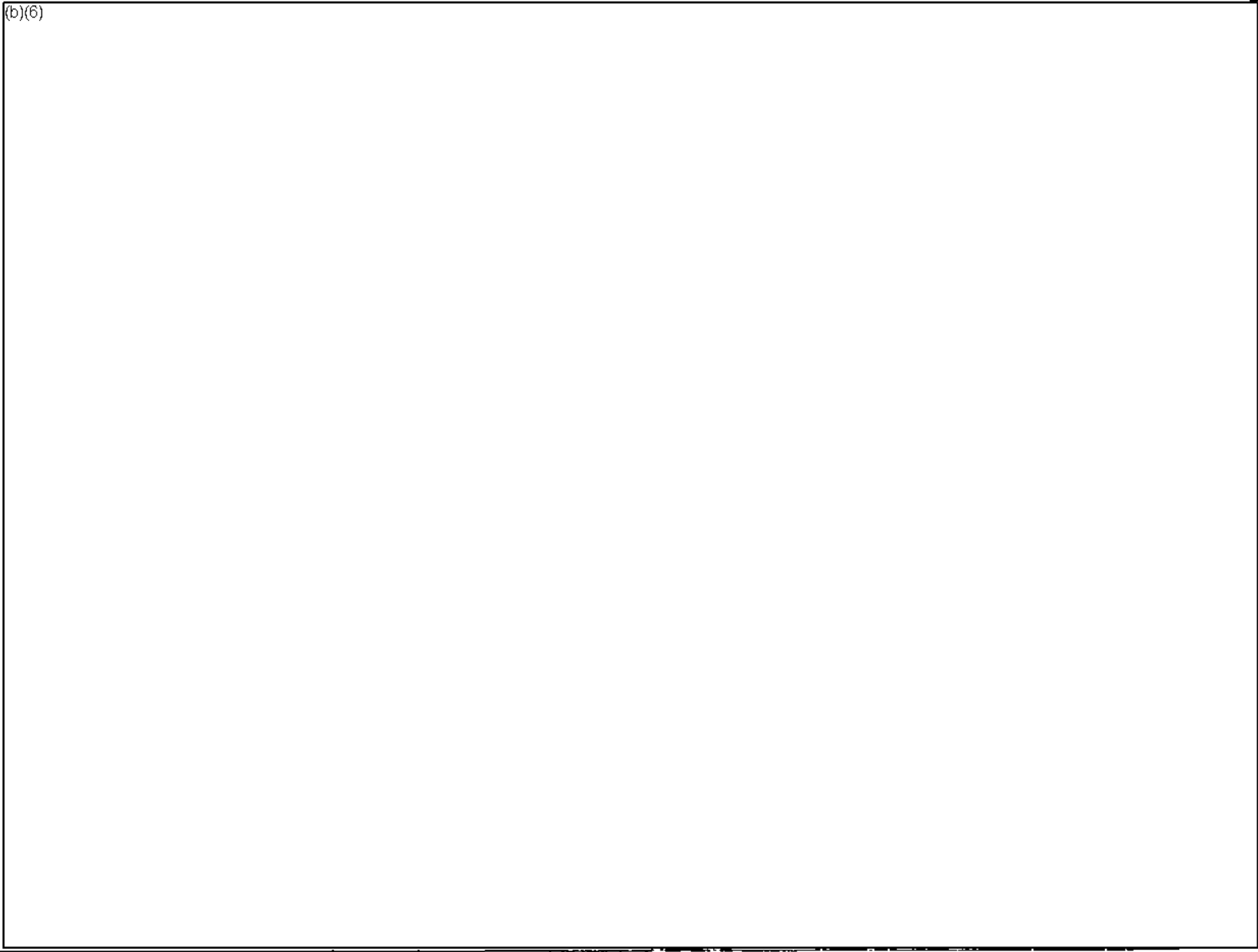
October 1 - 2, 2015

Ms. Dianna Murphy	Chair	Morehead State University	Morehead, KY
Dr. Kelly Moore	Student-Relations Specialist	Westwood College	Chicago, IL
Dr. Vicki Wise	Network & Technical Support Specialist	National University/Retired	Attica, OH
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Rita Kendall



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CHARLES M. WARE, D.H.Ed., M.S., CHES



EMPLOYMENT HISTORY

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RENEWAL OF ACCREDITATION

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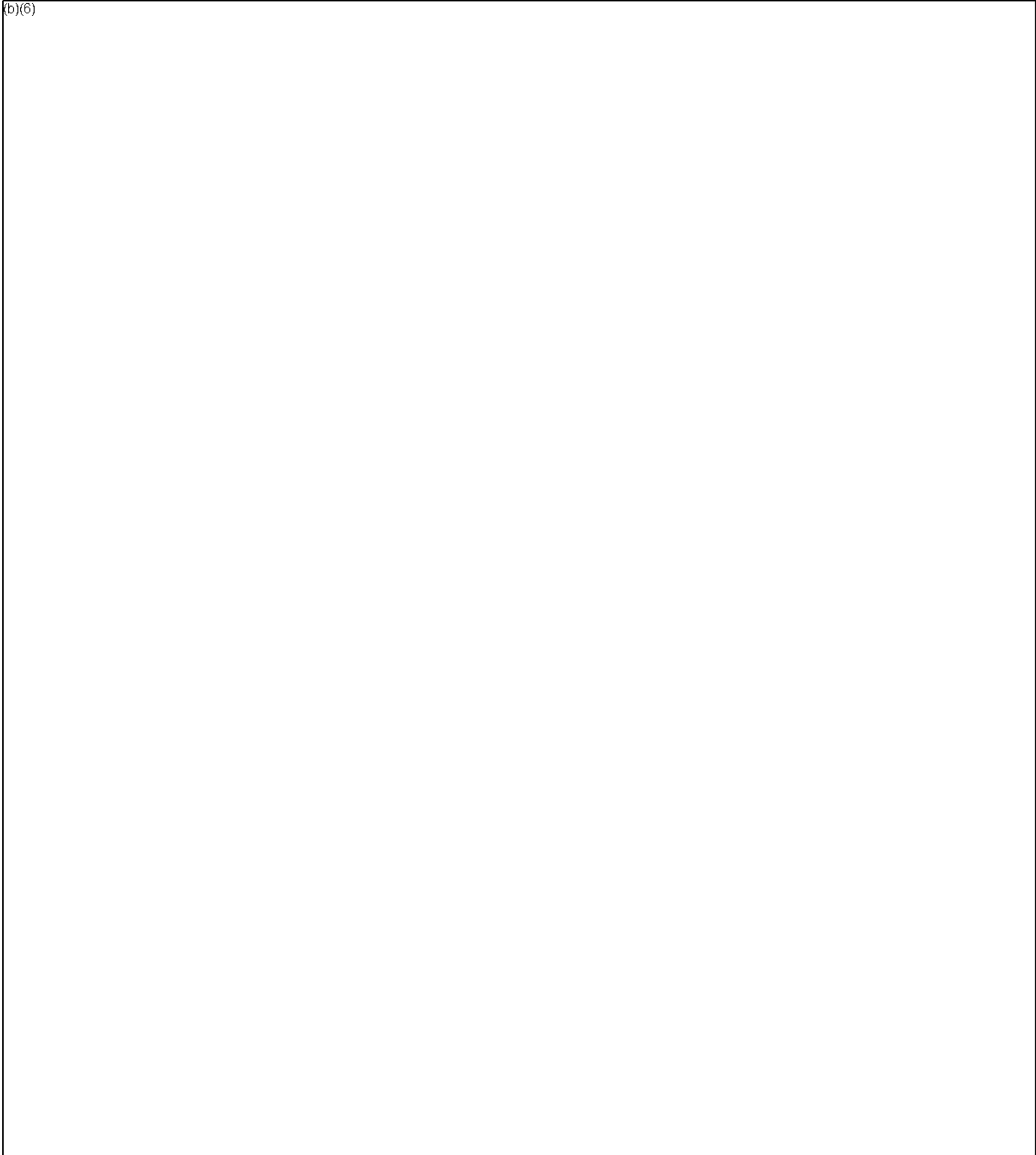
Ms. Micaela Sieracki	Chair	Campus President (ret), Everest College Portland	Charleston, SC
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Dr. Victoria Wise	Business/ Accounting/Project Management Specialist	Business Chair (ret), National University	Attica, OH
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Dr. Kwawisi	Applied Linguistics	Professor of International Languages	Wilberforce, OH

Tekpetey Specialist & Literature, Central State University
Ms. Shameka Erby Staff Representative ACICS Washington, DC

RUTH T. HUDSON



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RENEWAL OF ACCREDITATION VISIT REPORT

CAMPUS

ART INSTITUTE OF INDIANAPOLIS
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February 27, 2017

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Mr. Sean Glasgow	Graphic Design/ Graphic and Web Design/Web Design and Interactive Media	President D&G Systems Technologies Consulting Inc.	Newark, NJ
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MOEMA CUNHA SHORTRIDGE

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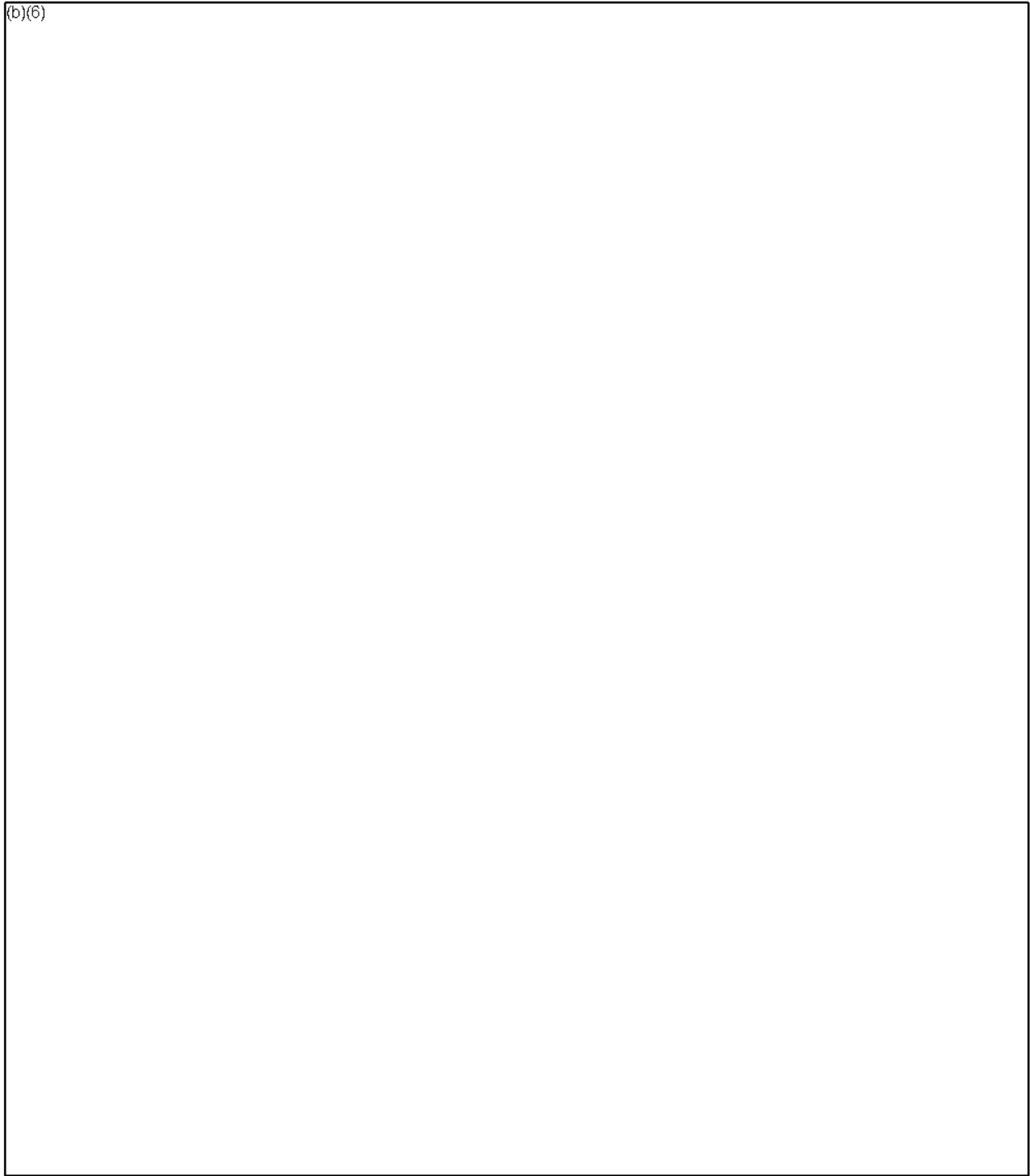
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SEAN GLASGOW



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RENEWAL OF ACCREDITATION VISIT REPORT

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Rochelle Redding, MS, CPC, NCMA

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BRANCH INCLUSION VISIT REPORT**STRATFORD UNIVERSITY – VIRGINIA BEACH****555 South Independence Blvd****Virginia Beach, VA 23452****ACICS ID Code: 00230405**

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Dr. Patricia Talbert	Educational Activities Specialist	Director of Public Health/Healthcare Management, Ustawi Research Institute	Apple Valley, MN
Dr. Richard Murphree	Business Administration Specialist	Consultant, Effectual Business Services	Eagle, ID
Dr. David Teneyuca	Information Technology and Information Assurance Specialist	Lecturer, University of Texas San Antonio	San Antonio, TX
Mr. William Mather	Culinary Specialist	Retired, Director of Education, Le Cordon Bleu	Melbourne, FL
Mr. Robert Donato, Jr. MBA	Hospitality and Culinary Specialist	Business Consultant	Miami, FL
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Ms. Lakeisha Wardlaw, MA	Pharmacy Technician Specialist	Program Director, Virginia College	Columbia, SC

Dr. Roblena Walker, PhD	Healthcare Administration Specialist	Instructor, Capella University	Mableton, GA
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Ms. Frenika Rivers	Staff Representative	ACICS	Washington, DC

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Patricia Y. Talbert, Ph.D., MPH, CPHA, CHES, CWP, cPHN

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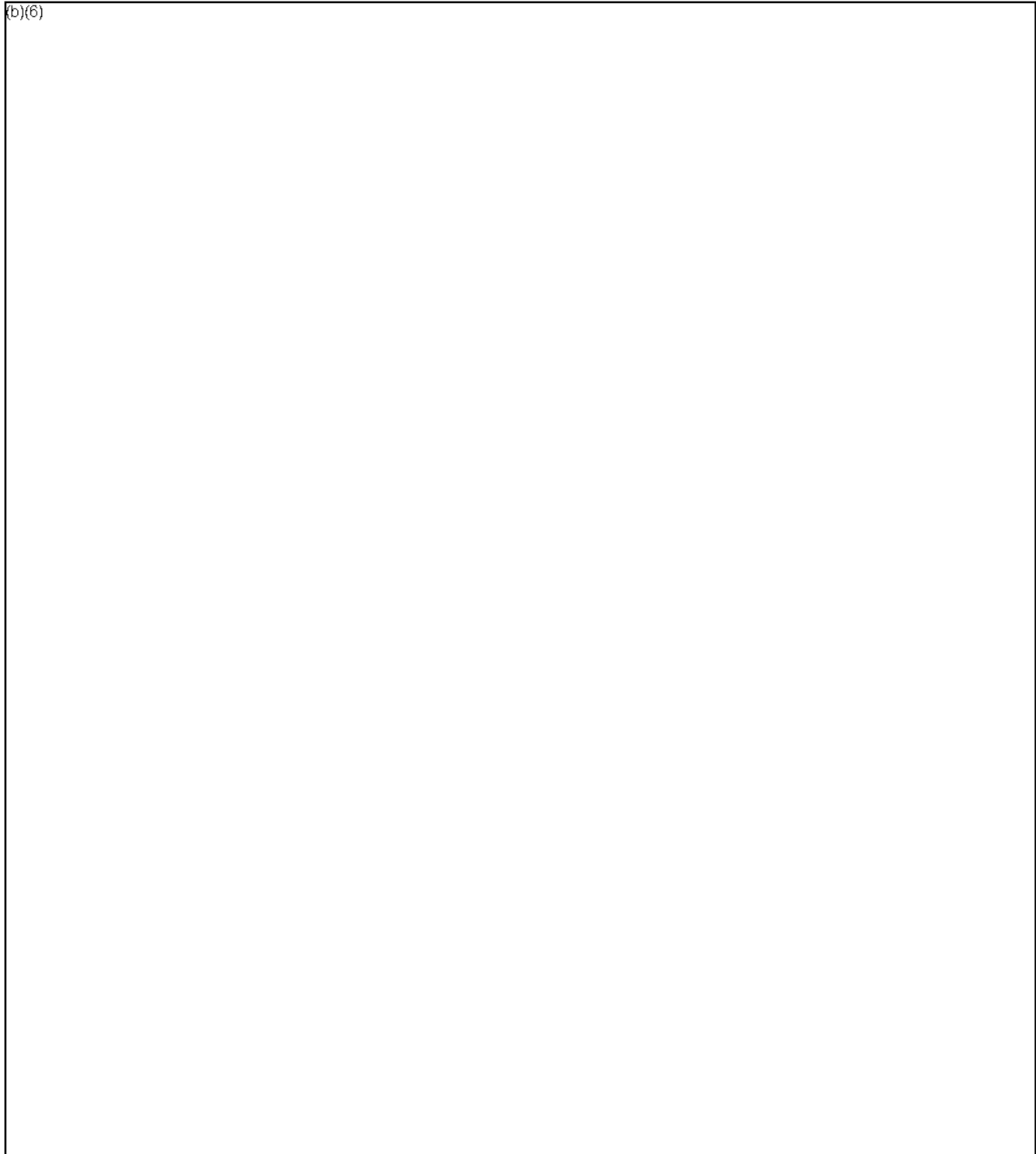
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INITIAL GRANT REPORT

ROCKFORD CAREER COLLEGE
1130 S. Alpine Road
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ACICS ID Code: 00262833

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MAIN CAMPUS
Madison Media Institute
Madison, WI
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June 8-9, 2015

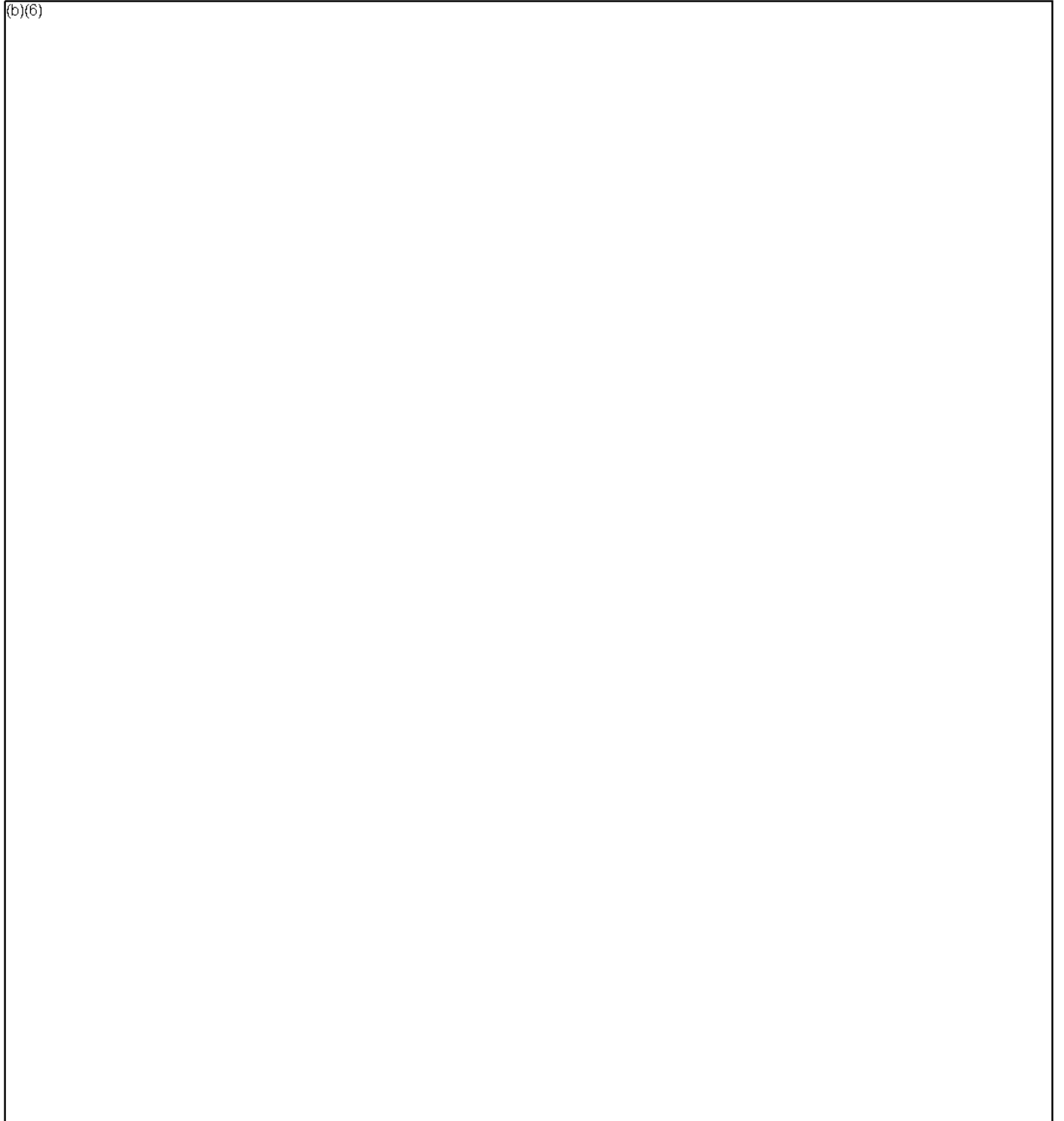
Ms. Mercedes N. Alafritz	Chair	DOE Solutions	Phoenix, AZ
Dr. Darlene A. Minore	Student-Relations Specialist	Minore Educational Strategies	Bainbridge Island, WA
Dr. Jack Phan	Educational Activities Specialist	Southern Arkansas University	Olathe, KS
Dr. Virgine Thomes-Cotter	Distance Education/Library Specialist	Vice President Academic Affairs (ret.)	Phoenix, AZ
Dr. Norbert Thomes	Information Technology Specialist	Winona State University	Winona, MN
Mr. Brian Balsavage	Business Administration/Accounting/Pharmacy Technician Specialist	Lincoln Technical Institute	Morrisville, PA
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Dr. Judith Bernstein	Paralegal Specialist	Westwood College	Denver, CO
Ms. Carmen B. Volpe	Veterinary Technician Specialist	UCLA	Los Angeles, CA
Ms. Tracee Derra	Massage Therapy Specialist	Massage South	Scottsdale, AZ
Mr. Maurice Wadlington	Staff Representative	ACICS	Washington, DC

Dr. Ravi Rathnam



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INITIAL GRANT OF ACCREDITATION VISIT REPORT

STEVENS-HENAGER COLLEGE
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Logan, UT 84321
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West Haven, UT 84401
ACICS ID Code: 00268575

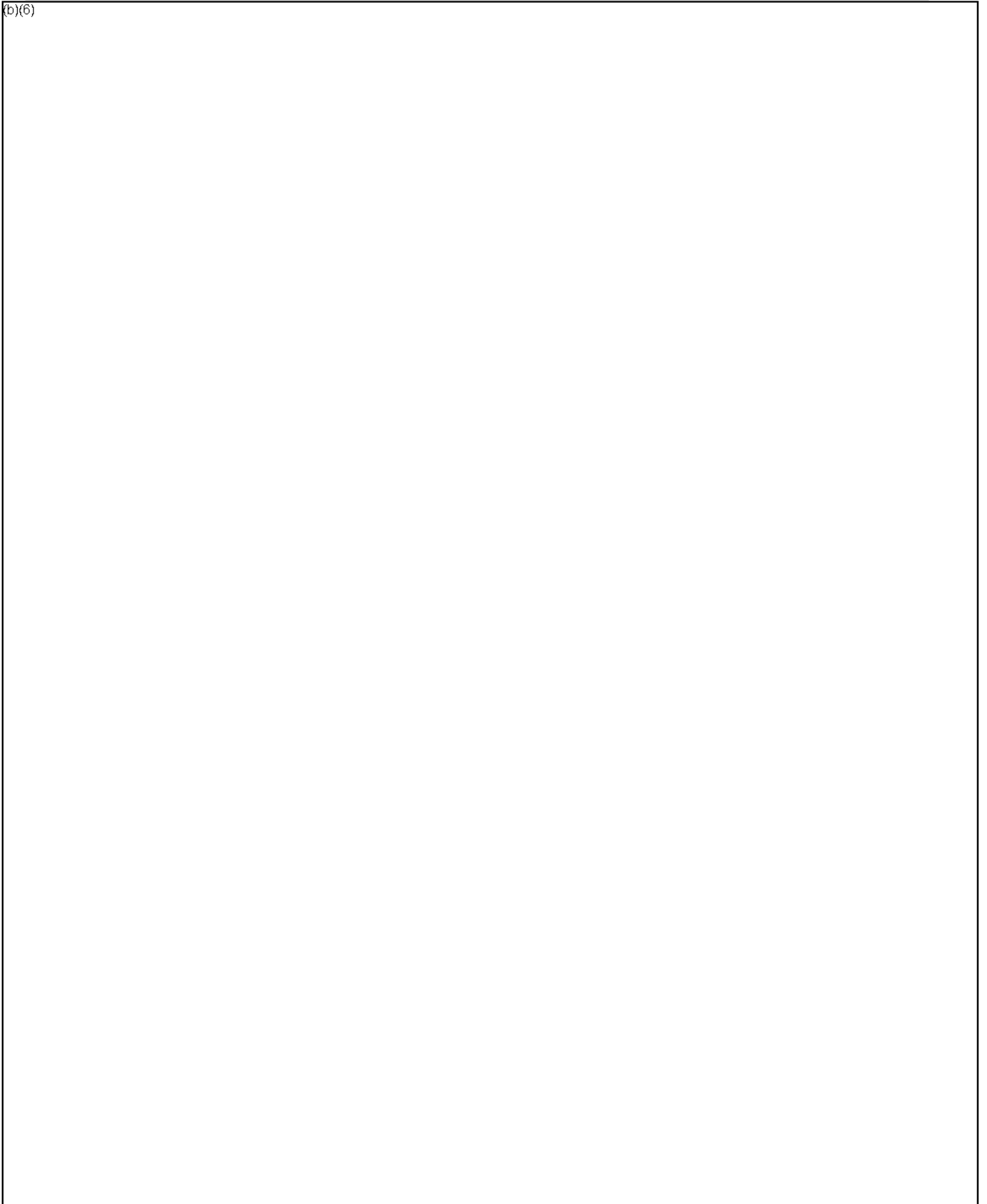
February 16 - 17, 2016

Mr. William Winger	Chair	American International College of Arts and Sciences Antigua	Denver, CO
Ms. Kathryn Sellers	Student-Relations Specialist	Corinthian Colleges (Online)	St. Augustine, FL
Dr. Judith Bernstein	Educational Activities and Library	Educator/Advisor	Denver, CO
Mr. Jim Grabe	Business and Accounting	Geneva Institute for Leadership and Public Policy	Orlando, FL
Mr. Chris Stagl	Web Design and Development, Graphic Arts	EDMC (former instructor)	Jackonsville, FL
Miss Lisa Bynoe	Distance Education and Medical Specialties	Argosy University	Charlotte, NC
Ms. Jan A. Chambers	Staff Representative	ACICS	Washington, DC

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Withheld pursuant to exemption

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