

# ACCSCCT Alert!

Information for  
our member schools

**To:** ACCSCCT Accredited Institutions and Other Interested Parties  
**From:** Elise Scanlon, Executive Director  
**Date:** March 17, 2004  
**Subject:** Amendments to the Standards of Accreditation

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The Accrediting Commission of Career Schools and Colleges of Technology has reviewed all written comments submitted by accredited institutions and other interested parties regarding the revisions to the Standards of Accreditation as proposed in the Commission's September 26, 2003 and December 16, 2003 Call For Comment. The Commission has subsequently voted to adopt the additions and revisions to the Standards of Accreditation in the following areas effective immediately unless otherwise indicated:

- *Section III (A)(7) & III (B)(4) – Faculty Qualifications*
- *Section IV (D) – Advertising*
- *Section VII (C) – Student Achievement*
- *Section X – Separate Facilities*
- *Section XI – Statement of Purpose, Distance Education*
- *Accreditation Overview – Accreditation Fees*

The full text of the Accreditation Alert can be found on the Commission's website at: [www.accsct.org](http://www.accsct.org). Go to "*Staying Accredited*" and then "*Accreditation Alert*." The revisions and additions have been incorporated into the Standards of Accreditation, a revised copy of which can be found on the Commission's website by going to "*Staying Accredited*" and then "*Standards of Accreditation*." The revised Standards of Accreditation dated March 17, 2004 should be used to replace all previous versions.

Accredited institutions and others maintaining complete, up-to-date copies of the Standards of Accreditation should add this notice to their current standards book under the Accreditation Alerts tab. For additional information related to these adopted changes, please contact Michale S. McComis, Director of Accreditation at (703) 247-4520.

## REVISIONS TO FACULTY QUALIFICATION STANDARDS

On July 10, 2003, the Commission issued an Accreditation Alert which included several changes to Section III of the Standards of Accreditation pertaining to faculty qualifications. Subsequent to the Accreditation Alert, the Commission received several letters voicing concern that the Commission's new requirements did not appropriately take into account the career education and technical training elements of the programs offered at ACCSCT accredited institutions. The specific standard which caused the greatest level of concern was the new Section III (B)(4) which required that "[f]aculty teaching technical and occupationally related courses in an academic associate or baccalaureate degree program must have a minimum of three years of related practical work experience in the subject area(s) taught and a baccalaureate degree." The concern was whether it is necessary and valid as an indicator of education quality to require both a baccalaureate degree and practical work experience for faculty teaching technical courses in academic degree programs. The comments pointed out that this new requirement would have the effect of excluding individuals from teaching technical courses who were technically proficient with significant practical experience, but lacked a college degree.

The Commission saw merit in the concerns expressed by the membership and accordingly issued another Call for Comment on September 26, 2003 to solicit additional information. At its November 2003 meeting the Commission reviewed the responses to the September 26, 2003 Call for Comment and determined that a standard which takes into account the following factors would be appropriate to ensure that faculty teaching technical and occupationally related courses in academic degree programs are qualified:

- A blend of academic preparation and technical proficiency is an appropriate benchmark for faculty teaching in academic degree programs;
- Practical related work experience is a paramount qualification;
- Faculty teaching in academic degree programs should have a level of academic preparation commensurate with the level of the course they are teaching;
- Higher level degrees should require higher level faculty qualifications;
- In exceptional cases, practical work experience should be permitted to substitute for a formal degree.

The Commission has always remained interested in ensuring that it establishes standards which are valid and reliable indicators of quality while preserving the unique character of career and technical education. To this end, the Commission has revised Section III (B)(4) in order to account for the above factors. In addition, the following points of clarification apply:

- This standard applies only to faculty teaching technical and occupationally related courses in *academic* degree programs. It does not apply to faculty teaching general education or applied general education.
- It is the Commission's intent that faculty teaching in what would generally be considered lower level – 100 and 200 level courses – will be required minimally to have four years of practical related work experience and possess a related associate degree. Faculty teaching in what would generally be considered upper level – 300 and 400 level courses – will be

required minimally to have four years of practical related work experience and possess a related baccalaureate degree.

- A “related degree” refers to a degree consisting of one or more components which relate to the course taught.
- The onus shall be upon the institution, in all instances, to justify its faculty hiring decisions, but particularly for those faculty members who do not possess a formal degree.

The new effective date for all standards under Section III (B) is April 1, 2004 and the grandfather provision for all currently employed faculty members has been extended to April 1, 2004. For faculty teaching technical and occupationally related courses in an academic degree program, the grandfathering provisions shall apply to the required number of years of practical work experience, however, because Section III (B)(4) allows for more options with respect to academic preparation, this standard shall be applied on a go forward basis.

On another note related to faculty qualifications, The Commission reviewed the comments of the membership and has adopted revisions to its standard which requires schools to maintain documentation of academic credentials. The Commission believes that it is equally important for schools to verify the background and experience of its faculty both in areas of practical work experience and formal education and training. The Commission did take into consideration the comments made by the membership, however, which suggested that “documenting” practical work experience can sometimes be problematic. Therefore, in the final version of this standard, the Commission requires schools to “verify” prior work experience and “maintain documentation of academic credentials.”

The Commission’s revised standards related to faculty qualifications and the verification of those qualifications follow:

### **III. Faculty**

#### **A. General Requirements**

7. The school must verify prior work experience and maintain documentation of academic credentials of all faculty members and administrators, as required, to demonstrate compliance with applicable Standards of Accreditation.

#### **B. Faculty Qualifications**

1. Faculty members must have appropriate qualifications and be able to teach in a manner that permits announced educational objectives to be achieved. All faculty must be able to demonstrate a command of theory and practice, contemporary knowledge, and continuing study in their field.
2. Faculty teaching technical and occupationally related courses in either non-degree or occupational associate degree programs must have a minimum of three years of related practical work experience.

3. Faculty teaching applied general education courses in an occupational associate degree program must have a baccalaureate degree with appropriate coursework in the subject area(s) taught or three years related practical work experience and college level coursework in the subject area(s) taught.
  4. Faculty teaching technical and occupationally related courses in an academic associate or baccalaureate degree program must have a minimum of four years of related practical work experience in the subject area(s) taught and possess a related degree at least at the same level of the course the faculty member is teaching. In exceptional cases, outstanding professional experience and contributions to the occupational field of study may be substituted for a formal degree. In such instances, the faculty member must possess a minimum of eight years of related practical work experience and the school must justify and document on an individual basis the outstanding professional experience and contributions to the occupational field.
  5. Faculty teaching general education courses in an academic degree program must have, at a minimum, a master's degree with appropriate academic coursework and preparation in the subject area(s) taught.
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### **REVISIONS TO ADVERTISING STANDARDS**

The Commission believes that the revisions to the advertising standards set forth below more clearly convey the Commission's expectations in these areas. The revisions to Section IV (D)(1) eliminate language that the Commission believes may unnecessarily restrict the ability of a school to distinguish individual campuses or training divisions in advertising. The revisions to Section IV (D)(6) contain a new requirement that advertisements which include salary information must also include the source of that information.

With respect to advertising and separate facilities, the new standards require disclosure of the relationship between a branch and its main school in each school's catalog and enrollment agreement as opposed to all forms of advertising as was previously required. Also, upon approval of the Application for Branch - Part I, institutions may advertise branch status as long as the Commission has persuasive evidence on file of the management's commitment to establishing the branch. The Commission believes that a lease or other evidence that management has acquired space for the purpose of installing a branch campus could provide such evidence. Accordingly, the Commission shall revise the Application for a Branch - Part I to ask for a signed lease, build-out plans, a property deed/mortgage or similar documentation that space has been acquired, and a floor plan for its branch campus. Without evidence that appropriate space has been acquired, a main school may be approved to go forward with the branching process, but will not be allowed to advertise the proposed branch campus. The Commission believes that standards requiring truthful and accurate representations cover any advertising that a main school and its branches might use including the advertising of accredited status (Section IV (D)(1)&(8), Standards of Accreditation). Please note that while a branch would be permitted to advertise the relationship between the branch

and the main school; a branch is *not permitted* to advertise *accredited status* until accreditation is actually conferred with the approval of the Application for a Branch – Part II.

#### **IV STUDENT RECRUITMENT:**

##### **D. Advertising and Promotion**

1. All advertising and promotional materials are truthful and accurate and avoid leaving any false, misleading, or exaggerated impressions with respect to the school, its location, its name, its personnel, its training, its services, and its accredited status.
2. A school may use the term “University” in its name only when such use has been approved by the Commission and appropriate state authorities.
3. The school’s advertising and promotional materials must clearly indicate that education, and not employment, is being offered. No overt or implied claim or guarantee of individual employment is made at any time.
6. School literature and advertisements may not quote salaries for an occupation unless they also accurately indicate the normal range or starting salaries in the occupation for which training is provided and include the source of this information.
8. A school may use the term “accredited” only if it indicates by what agency or organization it is accredited. Publication of accreditation must comply with the Advertising of Accredited Status form.
10. A school may describe in its catalog, advertise, or promote new programs, substantive changes, or degree programs only after receiving Commission approval.

##### **X. SEPARATE FACILITIES**

###### **E. Name & Relationship**

A branch may bear a different name from the main school provided that all applicable state requirements have been met. A satellite location must bear the same name as its main school or branch except that the name of the satellite location may also refer to its geographic location or type of training. Each school’s catalog and enrollment agreement must clearly define the relationship between a branch and its main school. All advertising and publications (e.g., catalog, enrollment agreement, recruiting literature, public notices, etc.) must identify the relationship between a satellite location and its branch or main school oversight entity.

###### **G. Advertising**

A branch may advertise and disclose its relationship to the main school only after the approval of the Application for a Branch – Part I. A satellite location may disclose in advertising and promotional materials its recognized status and relationship to the main school only after it has been granted recognition by the Commission.

## **REVISIONS TO SECTION VII (C) – STUDENT ACHIEVEMENT**

As part of the Commission's systematic program of review of the Standards of Accreditation, the Commission has reviewed the Student Achievement Standard and the process of data collection and verification. The Commission has analyzed completion and placement rate trends with the goal of ensuring that the standard continues to be an appropriate measure of successful student achievement and program quality. In doing so, the Commission reviewed its practice of continually attempting to collect data related to the pass rates of students on state required examinations and found that there is great disparity among the states' examination and programmatic requirements, testing methods and procedures and examination degree of difficulty. These disparities prevented the Commission from calculating an average state licensing examination pass rate that is reasonably based on comparable data and against which all applicable schools and programs can be measured fairly.

Therefore, the Commission has revised the student achievement standard in a manner which would tie state and federal licensure to the Commission's standard for job placement in disciplines where students must pass a state examination as a condition of employment. In this manner the Commission will monitor both state and federal licensure pass rates and, as necessary, professional certifications as a function of an institution's rate of student job attainment. If an institution is unable to demonstrate acceptable rates of student job placement, the Commission will have the opportunity to conduct a deeper examination to determine the extent to which poor performance on licensure or certification exams may be a contributing factor to low job placement. Through on-going monitoring and reporting mechanisms, the Commission will seek to obtain both quantitative and qualitative data in areas such as admissions policies, student services and administrative management in order to make sound judgments regarding student achievement and compliance with accrediting requirements. The language below represents the new language in the Commission's student achievement standard.

## **VII. STUDENT PROGRESS**

### **C. Student Achievement**

#### **1. Student Achievement**

The school must demonstrate successful student achievement by reporting acceptable rates of completion and placement in the career field for which the education was provided. These rates must be supported through student transcripts, the school's verifiable records of initial employment of its students and graduates, or other verifiable documentation. The Commission will review student achievement for each program offered at an institution.

#### **2. Completion and Placement Rates**

- a. The Commission establishes and publishes acceptable completion and placement rates for comparable schools and programs from information submitted in the Annual Reports of accredited schools. The Completion and Placement Chart is the Commission's

mechanism for collecting student achievement data and schools must provide this information in accordance with the prescribed requirements and instructions which accompany this chart. A school demonstrates successful student achievement when completion and placement rates meet or exceed the published rates. The Commission determines a school's completion and placement rates to be acceptable when:

- (1) The completion rate for each program is not less than one (1) standard deviation below the mean for comparable schools or programs.
  - (2) The placement rate for each program is not less than one (1) standard deviation below the mean for comparable schools or programs.
- b. A school whose completion or placement rate falls below the Commission's required rates may still demonstrate with supporting documentation the successful achievement of its students by taking into account economic conditions, location, student population served, length of program, students who withdraw from training but still obtain employment, state requirements, student pass rates on examinations required for employment (i.e., local, state and federal) or professional certifications, and other external or mitigating factors reasonably related to student achievement.
- c. If the completion or placement rates appear low in relation to comparable schools or programs even though such rates exceed the minimum quantitative standards set forth in Section VII(C)(2)(a), the Commission may require the school to demonstrate successful student achievement, taking into account the factors described in Section VII(C)(2)(b).

### **3. Student Achievement Outcomes Reporting**

When a school has not demonstrated successful student achievement or upon a determination that monitoring of a school's compliance in this area is warranted, the Commission may require a school to submit to on-going reporting of student achievement outcomes as directed or take other action as deemed appropriate. These reports may require the submission of student achievement outcomes data (e.g., student program retention, program completion, job placement, etc.); pass rates on professional certification examinations and examinations required to be taken as a condition of employment (i.e., local, state and federal); admissions criteria studies; institutional operations and improvement planning; or any other information that the Commission determines necessary to make a judgment regarding the successful achievement of students.

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## **REVISIONS TO SECTION X – SEPARATE FACILITIES**

The Commission has an obligation as part of its systematic program of review of the Standards of Accreditation to assess, on an on-going basis, the extent to which accrediting requirements remain valid, relevant and clear. Historically, the Commission's standards have contained

limitations on the number of separate facilities that could be added within a given period of time. While the Commission continues to believe that metered and carefully planned growth with adequate infrastructure are critical to ensuring the quality of educational programs, the Commission also recognizes there are instances that call for discretion and judgment. Accordingly, the Commission has revised its separate facility standards to permit some flexibility where good cause can be shown that more than one separate facility application should be considered within a given timeframe. The revisions also clarify the Commission's expectations with regard to ownership and management of separate facilities. To follow are the Commission's revisions to Section X of the Standards of Accreditation.

## **X. SEPARATE FACILITIES**

### **A. Classification**

There are two types of separate facilities: branch and satellite location.

#### **1. Branch**

A branch is a separate facility established by a main school that is geographically apart from the main school. The branch must be permanent in nature, offer courses in educational programs leading to a degree, a certificate, or other recognized educational credential, have its own faculty and administrative or supervisory organization, and must provide for all required educational resources and student services (e.g., advising, testing, library resources, financial aid, placement assistance, etc.). A branch must be adequately managed and under the supervision of a full-time on-site director. The management and supervision oversight of the branch must be carried out by the same ownership and management that controls the main school.

### **B. Responsibility**

A main school is responsible and accountable to the Commission for its separate facilities. The management and supervision oversight of the branch must be carried out by the same ownership and management that controls the main school. The main school is ultimately responsible and accountable for compliance with accrediting standards by its branch or satellite location or its branch's satellite location. Accredited status of the branch and recognition of the satellite location are dependent upon the continued accreditation of the main school. Accreditation of the main school requires adherence to accrediting standards by the branch or satellite location. A main school or branch may not have a separate facility which is not accredited or recognized by the Commission when that facility has students who receive benefits due to the accredited status of the school or students who are recruited using the name or accredited status of the school.

### **C. Eligibility Criteria**

1. A main school must have been accredited as such for one year before it may apply for a branch unless the main school can show good cause why it should be allowed to apply for a branch in a shorter timeframe. A branch need not have a history of prior operation in

order to seek accreditation as a separate facility. A main school or branch may seek recognition of a satellite location at any time.

2. A main school may not apply for accreditation of a branch within one year following the Commission's recognition of a transfer of accreditation resulting from the change of control unless the main school can show good cause why it should be allowed to apply for a branch in a shorter timeframe.
3. A main school subject to a Show Cause Order or Probation may not apply for accreditation or recognition of any type of separate facility. A branch subject to a Show Cause Order or Probation may not apply for recognition of a satellite location.
4. Institutions subject to reporting for issues related to financial soundness, student achievement or adequacy of management must seek and receive approval from the Commission in advance of submitting an application for a separate facility.
5. A main school may apply for accreditation of only one branch within any 12-month period unless the main school can demonstrate that it is otherwise eligible to apply for a branch; is currently in compliance with accrediting standards; can demonstrate past success in operating separate facilities; and can show good cause why it should be allowed to apply for a branch in a shorter timeframe.
6. A main or branch applicant school with separate facilities must have sufficient financial and managerial resources to operate every separate facility for which an application is submitted to the Commission.
7. A branch of a main school seeking initial accreditation must meet all criteria for eligibility as stated in Section I of the Standards of Accreditation. If, however, the main school and branch are institutionally accredited by a United States Department of Education recognized accrediting agency, then the requirement for two years of operational history shall not apply to the branch. A branch of a main school seeking initial accreditation must go through the entire accreditation process with the main school submitting its own Application for Initial Accreditation and Self-Evaluation Report.

**E. Name & Relationship [These same revisions are also included under the advertising standards revisions in this Accreditation Alert]**

A branch may bear a different name from the main school provided that all applicable state requirements have been met. A satellite location must bear the same name as its main school or branch except that the name of the satellite location may also refer to its geographic location or type of training. Each school's catalog and enrollment agreement must clearly define the relationship between a branch and its main school. All advertising and publications (e.g., catalog, enrollment agreement, recruiting literature, public notices, etc.) must identify the relationship between a satellite location and its branch or main school oversight entity.

**G. Advertising [These same revisions are also included under the advertising standards revisions in this Accreditation Alert]**

A branch may advertise and disclose its relationship to the main school only after the approval of the Application for a Branch – Part I. A satellite location may disclose in advertising and promotional materials its recognized status and relationship to the main school only after it has been granted recognition by the Commission.

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**ADDITION TO SECTION XI - DISTANCE EDUCATION**

The Commission has added a Statement of Purpose to Section XI which sets forth criteria for schools which offer distance education programs. When Section XI was promulgated in 1998 it was accompanied by a rationale which has acted as a summary of the distance education requirements including a definition of distance education. The Commission feels that this language should be incorporated fully into the Standards of Accreditation as a Statement of Purpose in order to harmonize Section XI with the other eleven sections. The Statement of Purpose serves as an overall description of the standards set forth in the accompanying section and provides an explanation of the Commission's expectations. The following is the new language to be included in the Standards of Accreditation.

**XI. DISTANCE EDUCATION**

**Statement of Purpose**

This section sets forth the criteria under which the Commission will recognize programs or courses of study offered via distance education. Schools must ensure that only appropriate programs or courses are taught using distance education methodologies; that assessment measures are in place for admissions, student progress and student achievement; and that appropriate resources and services are available to support student success. Distance education, as defined by the Commission, is a formal process in which the majority of instruction within a course or program occurs when the student and instructor are not in the same location. Distance education employs telecommunication or other technologies for the delivery of instruction, and may be synchronous or asynchronous in nature. Schools offering programs or courses of study via distance education must adhere to, and are responsible for demonstrating compliance with, accrediting standards as prescribed by this section, and elsewhere in the Standards of Accreditation. After a distance education course or program has been approved and included within an institution's scope of accreditation, it will be subject to the normal monitoring mechanisms available to the Commission.

### REVISIONS TO ACCREDITATION FEES

The Commission has revised its fee structure both for processing fees as well as the fees required for on-site evaluations. The fee increases noted below have been implemented in order to ensure that adequate resources are in place to review and evaluate school materials expeditiously and to add to the variety of services available to schools such as specialized institutional effectiveness workshops, faculty and management training, on-line training and resources, and accepting the electronic submission of documents. Lastly, the Commission has created a fee structure in which some fees are reduced when multiple reviews can be performed concurrently or in areas where the Commission believes the current fee was not in line with the resources expended in the review process (e.g., the change of name processing fee). These fee increases are effective July 1, 2004.

#### **New Accreditation Processing Fee Structure**

Activity	Fee
Accreditation Workshops:	
Member	\$450
Non-member	\$500
Consultants	\$1,000
Application for Accreditation:	
Renewal	\$1,500
Initial Applicant	Part-I \$500 Part-II \$2,000
Applicant Orientation On-site Evaluation	On-site Evaluation Fee
Application for Appeal of Comm. Decision Appeals Transcript	\$5,000 Actual Cost
Application for Approval of a Degree Program	\$1,500 for the 1 <sup>st</sup> application and \$750.00 for each subsequent and same program application when submitted concurrently by an affiliated school
Application for a Branch-Part I	\$1,000 with an On-site Evaluation Fee
Application for a Branch-Part II	\$1,000 with an On-site Evaluation Fee
Application for Clock Hour to Credit Hour Conversion	\$500
Change of Location Report-Part I	\$750
Change of Location Report-Part II	On-site Evaluation Fee
Change of Name Report-Part I	\$250
Change of Ownership Report-Part I	\$2,000
Change of Ownership Report-Part II	On-site Evaluation Fee
Consortium/Partnership Report	\$500
Distance Education Report	\$750*
Facility Expansion Report	No Fee
Late Fee	\$500

Activity	Fee
New Program Report - Related Programs	\$500 for the 1st report and \$250 for each subsequent and same program report when submitted concurrently by an affiliated school
New Program Report - Unrelated Program	\$750 for the 1st report and \$375 for each subsequent report when submitted concurrently by an affiliated school
Program Modification Report for Non-Substantive Changes	No Fee
Program Modification Report for Substantive Changes	\$500
Satellite Location Report	\$750 with an On-site Evaluation Fee
Substantive Change Report - Change of Mission or Educational Objectives	\$750

\* May also require an on-site evaluation

**Late Fees:**

Late fees will apply to all reports and applications listed above as well as responses to on-site evaluation reports and any other Commission directed report or response that has a specific deadline. The \$500 late processing fee is assessed and due the day following the due date of a report, application or response. A late fee will be reduced to \$250 if the school has requested an extension grant prior to the due date.

**International Fees:**

On-site evaluation fees for schools outside of North America and the Caribbean will be assessed on a direct cost basis. Additional fees may also be assessed to schools outside of the United States or its territories to accommodate language translation needs.

**On-site Evaluation Fees**

Activity	New Fee
On-site Evaluation Fee	\$1,200 per evaluator for the first day and \$350 per evaluator per day thereafter.
Occupation Specialist Fees Local Non-Local	\$250 per day \$1,200 for the first day and \$350 per day thereafter.