ACCSCT Alert!

Information for our member schools

To: ***ACCSCT Accredited Institutions and Other Interested Parties***

From: ***Elise Scanlon, Executive Director***

Date: ***February 15, 2006***

Subject: ***Amendments to the Standards of Accreditation***

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 December 13, 2005 and December 14, 2004 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:

- ***Section II (A)(1) – Program Length***
- ***Section II (A)(2) – Program Organization***
- ***Section II (A)(6) – Externships***
- ***Section VI – Student Services***
- ***Section VII (C) – Student Achievement Standard***

The Commission has also amended the Standards of Accreditation as appropriate in the following areas:

- ***Required Rates of Student Achievement***
- ***Maximum Timeframes for Achieving Compliance***
- ***Interpretative Guidance – Faculty Qualification Requirements for General Education Faculty***

The full text of the Accreditation Alert can be found on the Commission's website at: ***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 February 15, 2006 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, Associate Executive Director, at (703) 247-4520.

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Approved Revision – Section II (A)(1), Program Length

Rationale:

The Commission recently revised its degree standards implementing a maximum program length for degree programs (see Section II (B)(2)(b) and Section II (B)(3)(b) of the Standards of Accreditation). The Commission's general standard on program length, however, did not have the same delimiting effect relative to the overall length of a program. The Commission believes this is an appropriate requirement for all programs as a means to ensure that program length, market area needs, and educational objectives are all aligned. Accordingly, the revision to Section II (A)(1) of the Standards of Accreditation adds conforming language to the Commission's general program length standard and requires a school to justify its program length when a significant disparity in length exists between its program and comparable programs in the same field of study. The new language for Section II (A)(1) follows:

> **Program Length**
>
> The length of each program offered by the school is appropriate to enable students to achieve the program objectives and to acquire the knowledge and skills necessary for initial employment in the field for which training is provided. Schools that have or apply for programs which appear to be significantly shorter or longer in clock or credit hours than comparable programs (i.e., within the same field of study) will be required to justify the appropriateness of the program length.

Approved Revision – Section II (A)(2), Program Organization

Rationale:

The Commission recently revised its degree standards and included language requiring that programs have an appropriate number of lecture, laboratory/shop, and externship hours (see Section II (B)(1)(b) of the Standards of Accreditation). The Commission's general standard for program organization, however, did not include this same language. Accordingly, the Commission has adopted the addition of the language from the degree program standards as a conforming amendment to Section II (A)(2) of the Standards of Accreditation as follows:

> **Program Organization**
>
> For every program, there are detailed and organized instructional outlines and course syllabi showing a scope and sequence of subject matter sufficient to achieve the announced program objectives. Programs are organized to include the appropriate number of lecture hours and, as applicable, the appropriate number of laboratory/shop and/or externship hours necessary to achieve the program objectives.

Approved Revision – Section II (A)(6), Externships

Rationale:

The surveys collected from the ACCSCT Systematic Program of Review showed that the Commission's externship standard lacked sufficient guidance regarding the Commission's expectations, particularly with respect to the requirement for a written training plan and the school's responsibilities for supervision of the externship. Using the findings from the study, the comments from the focus group and the responses to the Call for Comment the Commission adopted the following comprehensive re-write of the Commission's externship standard.

II. PROGRAM REQUIREMENTS

A. General Requirements

Externships

a. An externship is a component of a program that is offered in a bona fide occupational setting for which training and education are provided. This standard applies to externships, internships and other similar occupational activities for which educational credit is awarded. When used, an externship may occur throughout the course of a program or as a capstone requirement. The objectives and goals of an externship must be to allow students to apply practically the theory and skills taught in classroom and laboratory settings of instruction.

b. Externships must be based on a written training plan which specifies the goals, educational objectives, and specific experiences and applications to be accomplished. The written training plan must identify required educational resources, established timelines for the externship, and the evaluation process and criteria to be used that appropriately and fairly measure demonstrated competency and skill attainment.

c. Individual student externships must be supervised by a designated school employee who has the appropriate practical work experience qualifications for instructors as follows:

   1. For externships in a non-degree or in an occupational associate degree program, instructor practical work experience means three years of related practical work experience in the occupational field associated with the training provided.

   2. For externships in an academic degree program, instructor practical work experience means four years of related practical work experience in the occupational field associated with the training provided and an earned related degree at least at the same degree level as the program for which the externship is a component.

d. The training plan must designate an on-site supervisor from the occupational setting who will guide and oversee the student learning experience and participate in student evaluations. School personnel must orient the on-site supervisor to evaluation processes and criteria in order to ensure the appropriate and fair measurement of demonstrated competency and skill attainment.

e. Schools are expected to maintain an appropriate balance among classroom, laboratory/shop and externship activities within the program, as evidenced by the course outline. Any externship which is greater than one-third of the total length of the program requires review and approval by the Commission.

f. If an externship is part of the course completion requirements, students may not be considered as graduates or issued a graduation credential until the requirements of the externship have been satisfactorily completed.

Approved Revision – Section VI, Student Services

Rationale:

The surveys collected from the ACCSCT Systematic Program of Review showed that the Commission's standards regarding the availability of job placement assistance and requirements for issuing transcripts could be stated more clearly. A focus group concurred and recommended a review of these standards. In reviewing these standards, the Commission took a comprehensive approach to Section VI and found that the student services standards should be broadened to ensure that sufficient services are provided in a comprehensive fashion to all students. The responses from the Call for Comment concurred with few exceptions which the Commission took into account when drafting the final version of these standards. These revisions serve to address the specific results of the Systematic Program of Review in the areas of placement assistance and the issuance of transcripts and also to better reflect current best practices for the delivery of student services in ACCSCT accredited institutions.

SECTION VI – STUDENT SERVICES

STATEMENT OF PURPOSE

The purpose of this section is to ensure that schools remain attentive to their students' educational and other needs. This section requires that schools meet minimum requirements in regard to advising, record maintenance, graduate employment assistance, and procedures for handling student complaints. The school must maintain written policies and procedures addressing student services. The school must maintain adequate student services and resources which support its students in maintaining satisfactory progress, achieving successful educational and employment outcomes, and making informed decisions concerning training and employment. The students' needs for these services are continually monitored.

A. Advising and Counseling

1. The school must maintain a student services program that takes into account the number of programs, and size and mix of the student body and that responds to individual student needs. These services must be coordinated by an individual with appropriate professional and educational qualifications and must minimally encompass relevant coping skills (e.g., life, career development, budget, and personal financial planning skills); general development appropriate to higher education students; student retention strategies suited

to the school's programs; academic advising; testing and tutoring services; supervision and monitoring of attendance records and leaves of absence; graduate employment assistance; and information concerning housing, transportation, and child care.

2. Student services for schools which enroll ability-to-benefit students must include individual counseling. An individual providing counseling services must have an appropriate license, credential, or training and work experience in the area of counseling. A school may contract with or refer students to an individual or service that is able to provide such counseling services. Unless so qualified, an advisor may not perform the functions of a counselor and may not be referred to as a counselor.

3. The school must maintain documentation of student advising sessions by date and place.

B. Student Records

1. The school must maintain a permanent educational record for all currently enrolled students that consists of all admissions, academic, and financial records and information upon which a student's enrollment is based. These records (physical or electronic) must be securely maintained and protected against damage or loss (e.g., fire, water, theft, tampering, etc.).

2. The school must maintain an official transcript for all formerly enrolled students (i.e., graduates and terminated or withdrawn students). The transcript must include, at a minimum, the program of study; the date of program entry; the date of graduation, termination or withdrawal; and the clock or credit hours and grades earned. An official transcript must be made available to students upon request and in accordance with the school's policies. This transcript (physical or electronic) must be securely maintained indefinitely and protected against damage or loss (e.g., fire, water, theft, tampering, etc.).

3. The school must maintain student financial records related to financial aid, tuition and fee payments, and tuition refunds for a minimum of five years. (State or federal regulation or law may require these records to be maintained for a longer period of time.)

C. Graduate Employment Assistance and Records

1. Graduate employment assistance must be made available to students and the extent and nature of employment assistance services must be as claimed by the school.

2. Any public notice made of graduate employment rates must include a notice on the school's graduate population base and time frame upon which those figures are based.

3. The school must maintain verifiable records of each graduate's initial employment for five years. Any statement regarding the percentage of graduate employment, e.g., annual employment rates of graduates, must be based upon these verifiable records.

D. Student Complaints

1. The school must utilize a policy and procedure for handling student complaints and inform students in writing of the policy and procedure. The school's complaint policy and procedure must be published in the school's catalog and include a reference to the school official(s) responsible for the complaint policy and procedure.

2. The ACCSCT Student Complaint/Grievance Procedure contained in the Student Complaint Exhibit must be published in the school's catalog.

3. The school must maintain a complete record of all written student complaints for at least the last five years.

Approved Revisions – Section VII (C) – Student Achievement

In a December 14, 2004 Call for Comment, the Commission suggested a revision to the language of the student achievement standard. Previously, the Commission noted that its standard for student achievement may have inadvertently created the impression that the Commission may consider state licensing pass rates as a mitigating factor to account for lower rates of student achievement. This was not the intent when the Commission revised its standard for student achievement. The intent of the previous revision of the standard was to allow institutions to explain structural impediments to reporting acceptable rates of student achievement based upon the time frames within which students are able to take required state licensing examinations (i.e., a lengthy period of time between a student's graduation date and the date when the state licensing examination is offered could be a reasonable "mitigating circumstance" within the Commission's student achievement reporting formula). In order to avoid any future confusion, the Commission has deleted this language from the standard. The Commission may still consider these types of structural impediments as mitigating factors even though the language regarding pass rates on state licensing exams is no longer expressly stated in the standard.

In addition, in the December 13, 2005 Call for Comment, the Commission suggested replacing the language "Completion and Placement" with "Graduation and Employment." Upon review of the responses to the Call for Comment, the Commission has adopted a global replacement of the revised language in the Standards of Accreditation and associated forms, reports and applications as proposed. The Commission believes that the terms graduation and employment more clearly express expectations for student achievement and will make clear to those from outside the career education field what is meant when student achievement outcomes are discussed and reported.

VII. STUDENT PROGRESS

C. Student Achievement

1. Student Achievement

The school must demonstrate successful student achievement by reporting acceptable rates of student graduation and employment in the career field for which the school provided education. These rates must be supported through student transcripts, the school's verifiable records of initial employment of its graduates, or other verifiable documentation.

The Commission will review student achievement for each program offered at an institution and take into account not only the rates at which students graduate from a training program and attain employment in a training related field, but also other factors which are reasonably related to student achievement as a measure of educational quality and institutional effectiveness.

2. Graduation and Employment Rates

a. The Commission establishes and publishes acceptable graduation and employment rates for comparable schools and programs from information submitted in the Annual Reports of accredited schools. The Graduation and Employment 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 graduation and employment rates meet or exceed the published rates. The Commission determines a school's graduation and employment rates to be acceptable when:

   i. The graduation rate for each program is not less than one (1) standard deviation below the mean for comparable schools or programs.

   ii. The employment rate for each program is not less than one (1) standard deviation below the mean for comparable schools or programs.

b. A school whose graduation or employment rate falls below the Commission's required rates may still demonstrate with supporting documentation the successful achievement of its students by taking into account such factors as: economic conditions, location, student population served, length of program, students who withdraw from training but still obtain employment, state requirements, and other external or mitigating factors reasonably related to student achievement.

c. If the graduation or employment 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

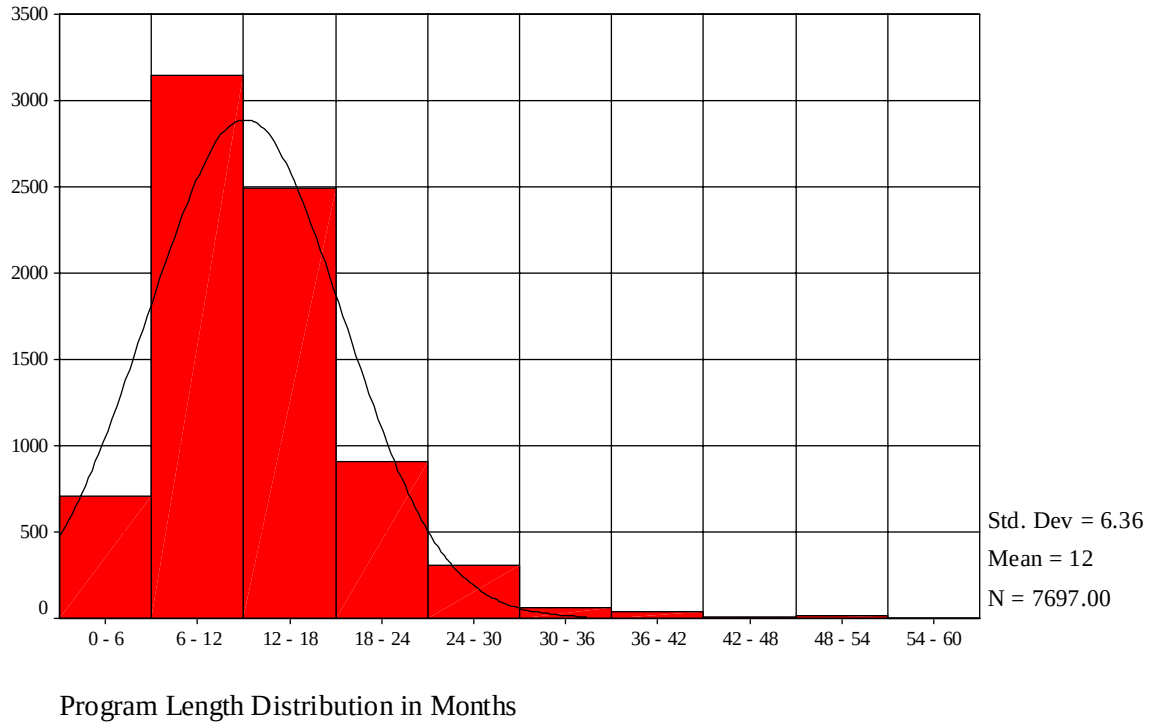
When a school has not demonstrated successful student achievement or upon a determination that monitoring of a school's compliance in this area is warranted, the Commission may require a school to submit to on-going reporting of student achievement outcomes as directed or take other action as deemed appropriate. These reports may require the submission of student achievement outcomes data (e.g., student program retention, graduation rates, employment rates, 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.

Approved Revisions – Section VII (C) – Student Achievement

The Commission determines the required rates of student program completion and employment for its accredited schools from data collected from the Annual Report submitted by ACCSCT accredited institutions and adjusts the Student Achievement Standard based on these data (see Section VII (C), Standards of Accreditation). The Commission last promulgated its acceptable rates for student achievement in December 2003 based upon Annual Report data for the period 2000-2002. The Commission has since analyzed the student achievement data for the years 2002-2004 and has established its new rates of student achievement based upon the findings from that analysis.

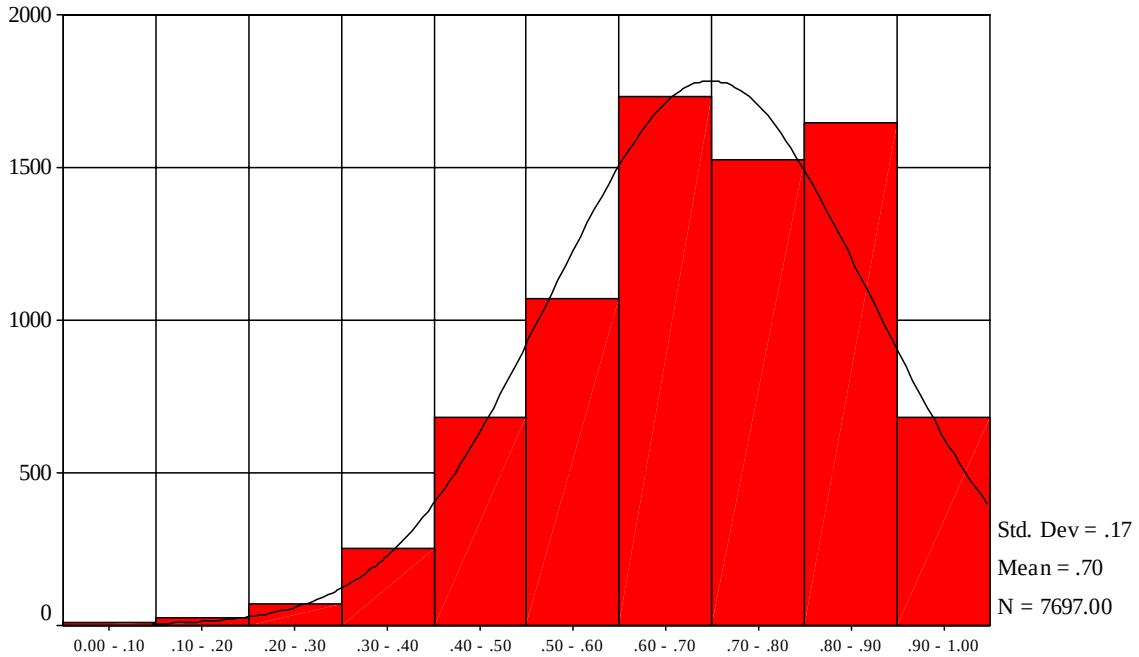
The analysis has again demonstrated that a significant negative relationship exists between program length and student program completion (r = -.455, two-tailed significance = .000, N = 7697).[1] Due to this significant relationship, the Commission will continue to use the fixed program length categories for grouping comparable program completion data (e.g., 1-6 months, 7-11 months, etc.). The graphs which follow provide information about the data used by the Commission in determining the new required student achievement rates. Figure 1.1 shows the distribution of programs used in the analysis; Figures 1.2 and 1.3 shows the distribution of all student program completion and employment rates for 2002-2004; Figure 1.4 shows the student program completion rates by program length category; and Figure 1.5 shows employment rates

Figure 1.1 – Program Length Distribution 2002-2004



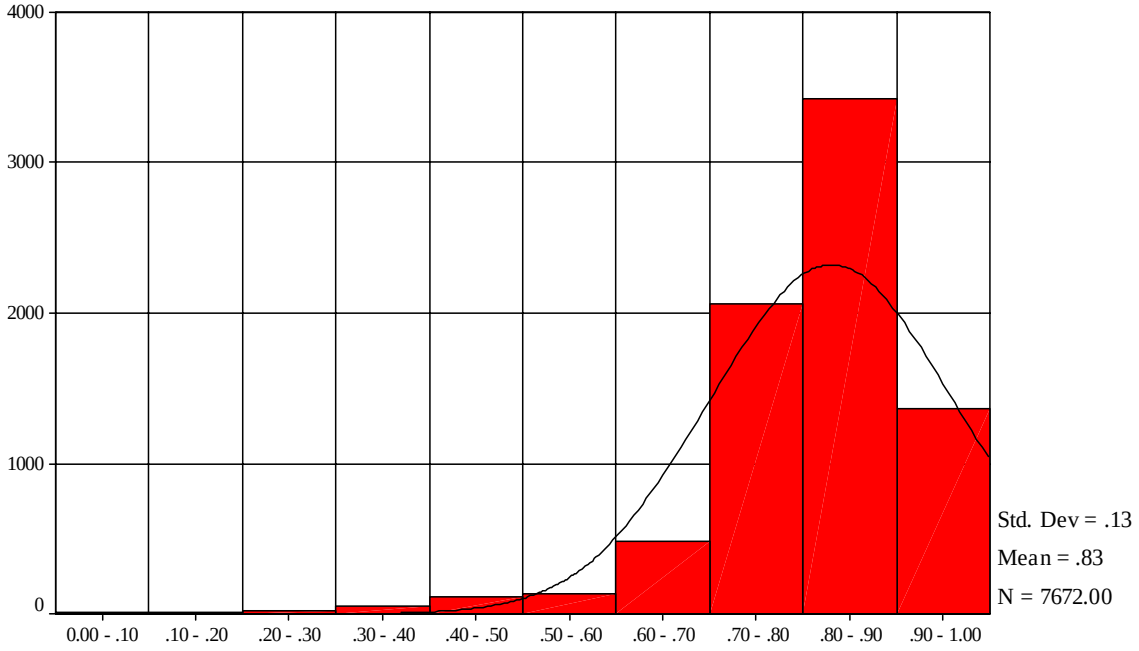
[1] This significant negative relationship has been found consistently in the Commission's research and analysis of its student achievement data.

Figure 1.2 – Distribution of Student Program Completion Rates 2002-2004



Student Program Completion Rates (%)

Figure 1.3 – Distribution of Employment Rates 2002-2004



Employment Rates (%)

Figure 1.4 – Student Program Completion Rates by Program Length 2002-2004

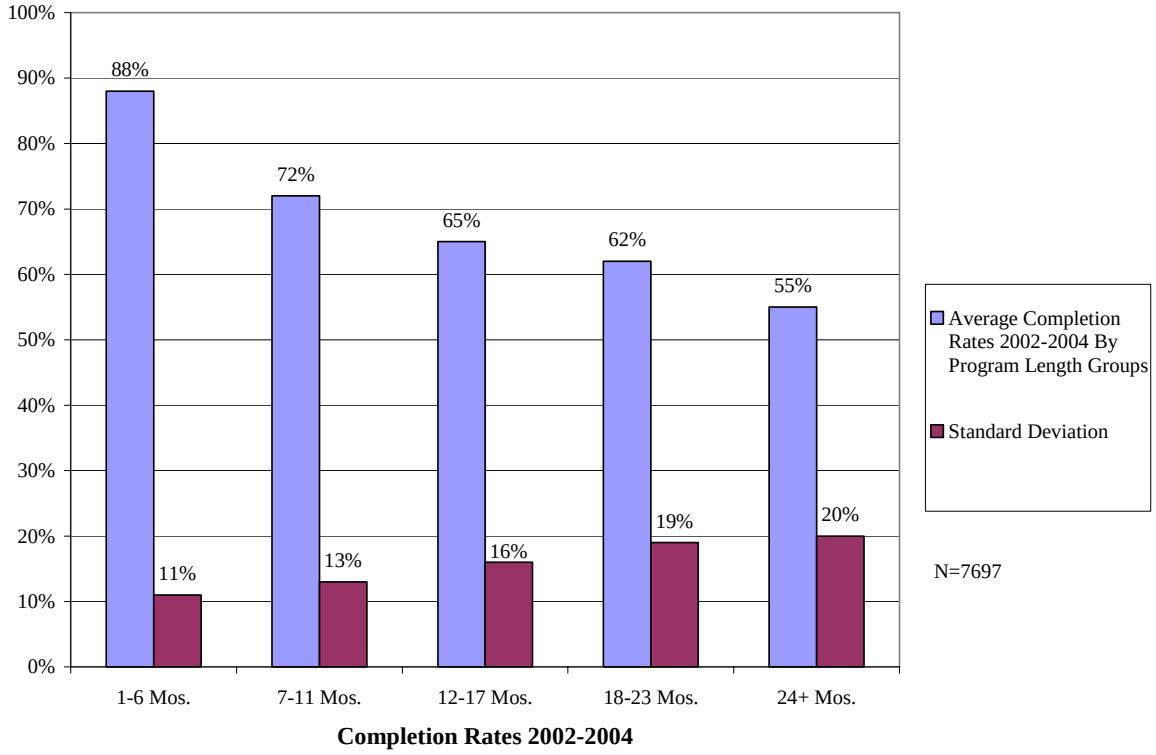
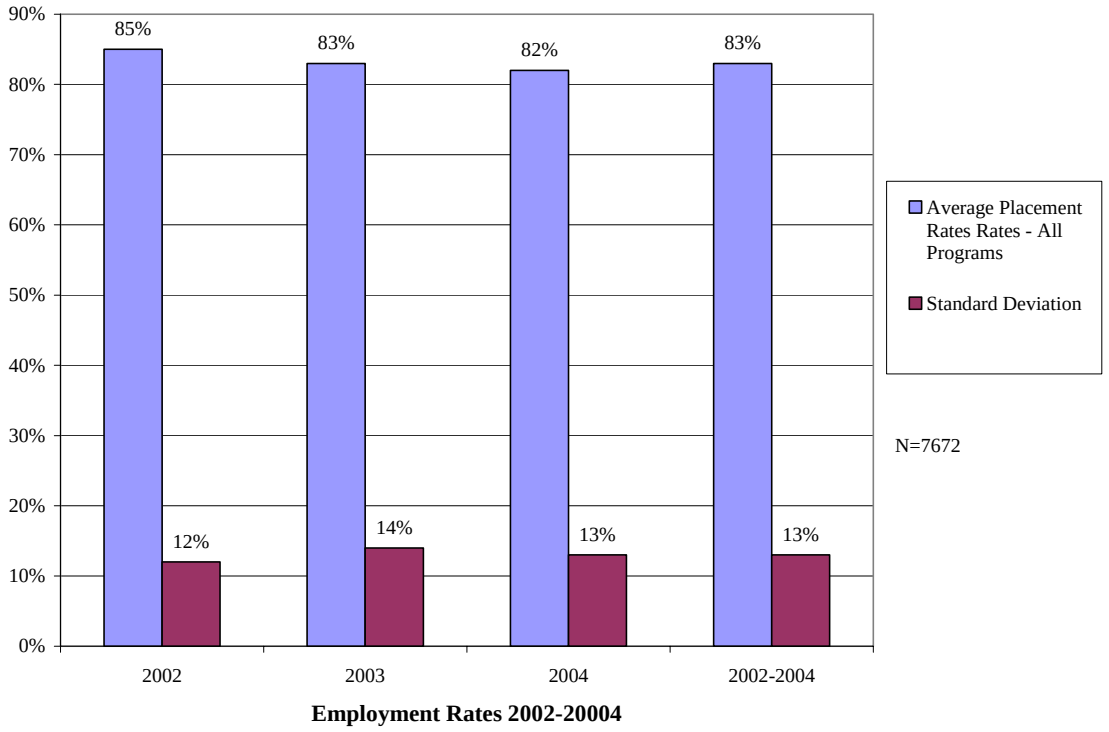


Figure 1.5 – Employment Rates by Year 2002-2004



Using the data described above, the Commission has established the new required rates for graduation and employment. The following student achievement rates are effective as of February 15, 2006 and for all Completion and Placement Charts (now referred to as the Graduation and Employment Chart) that use a Report Date of July 2005 and later. These rates will remain in effect until further notice.

REQUIRED GRADUATION RATES

Program Length in Months	Average Rates of Graduation Demonstrates Acceptable Student Achievement	Standard Deviation	Minimum Required Graduation Rates
1-6	88%	11%	77%
7-11	72%	13%	59%
12-17	65%	16%	49%
18-23	62%	19%	43%
24+	55%	20%	35%

REQUIRED EMPLOYMENT RATE

Program Length in Months	Average Rate of Employment Demonstrates Acceptable Student Achievement	Standard Deviation	Minimum Required Employment Rate
All Programs	83%	13%	70%

Please note that as per Section VII (C)(2)(b) of the Standards of Accreditation, a school whose graduation or employment rate falls below the Commission's required rates may still demonstrate with supporting documentation the successful achievement of its students by taking into account such factors as: economic conditions, location, student population served, length of program, students who withdraw from training but still obtain employment, state requirements, and other external or mitigating factors reasonably related to student achievement.

Approved Addition – Maximum Timeframes for Achieving Compliance

On May 10, 1995 the Commission distributed an Accreditation Alert informing the membership and other interested parties of the "ACCSCT Policy on Timeframes for Achieving Compliance." As this Alert indicated, when an accredited institution is out of compliance with accrediting standards, it has long been the Commission's policy to require the institution to bring itself into compliance as expeditiously as possible or to take prompt adverse action after affording the institution appropriate notice and an opportunity to respond. The Commission's actions depend upon the severity of the non-compliance, the feasibility of corrective action, the effect upon students, and all other relevant facts and circumstances.

The regulations of the Department of Education on the recognition of accrediting agencies specify maximum timeframes for allowing an institution to bring itself into compliance when an accrediting agency believes a violation of accrediting standards has occurred (34 CFR, §602.20). The Commission notified the membership in the May 10, 2005 Accreditation Alert that if the Commission's review of an institution under any standard indicates that the institution is not in compliance with the standard, the Commission would require the institution to take appropriate action to come into compliance within the following timeframes:

1. Within 12 months, if the program, or the longest program offered by the institution, is less than one year in length;
2. Within 18 months, if the program, or the longest program offered by the institution, is at least one year but less than two years, in length; or
3. Within 24 months if the program, or the longest program offered by the institution, is at least two years in length.

If an institution does not come into compliance within the specified period, the Commission will take immediate adverse action unless the Commission determines that there is good cause to extend the period for achieving compliance. The Commission does reserve the right to take an adverse action against an institution as circumstances warrant prior to the expiration of these timeframes.

Due to the importance of this policy, which has been in effect for several years, the Commission has determined that its inclusion in the Standards of Accreditation is appropriate since its publication in the May 10, 2005 Accreditation Alert has the same effect. Therefore, the Commission's policy on the timeframes for achieving compliance has been added to the *Process and Procedures, Commission Actions* section of the Standards of Accreditation.

Approved Addition – Faculty Qualification Provisions (Appendix I)

The Commission has found it necessary to provide an interpretation of Section III (B)(5) of the Standards of Accreditation and what is meant by "appropriate academic coursework and preparation" for faculty teaching general education courses. Section III (B)(5) of the Standards of Accreditation states the following:

> 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.

The Commission has determined that "appropriate academic coursework and preparation" in Section III (B)(5) means a minimum of ***15 semester credit hours (or the equivalent) in related subject areas which support the curriculum content.***

The Commission intends to conduct additional research in this area to ensure that ACCSCT requirements stay aligned with the best practices for faculty qualifications. Accordingly, this interpretation is subject to change. For now, this interpretative guidance has be added to Appendix I of the Standards of Accreditation, is effective immediately, and applies to all faculty teaching general education courses.