

ACCSC Standards of Accreditation Review

Overall Summary

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Executive Summary

The Accrediting Commission of Career Schools and Colleges (ACCSC) contracted with the National Center for Higher Education Management Systems (NCHEMS) to provide external evaluation assistance to fulfill its federal requirement to regularly review its standards. A thorough and comprehensive review of both the *Standards of Accreditation* (01/01/09 version) and ACCSC's outcome and achievement criteria was successfully completed. ACCSC has developed standards and criteria which it can be proud of, and this review provides evidence in support of this finding.

The design of ACCSC's Standards and associated review process follows established practice in institutional accreditation. The ACCSC Standards are notable for setting an appropriate level of specificity with respect to capacity or performance. This stance allows flexible application to a wide range of differing institutional circumstances while at the same time providing enough guidance for teams to recognize whether or not an institution is in compliance with the Standards. Several other aspects of the ACCSC Standards are exemplary including

- Strict adherence to quantitative standards of performance with respect to degree completion and employment placement,
- The provision for granting institutions due process should they take issue with a decision that the Commission makes,
- Mandatory workshops for new candidates, and
- The Pilot Project initiative which allows institutions to suspend particular standards or certain aspects of their self-evaluation in favor of innovative studies that can benefit them and career education more generally.

Feedback from institutional members reinforces these findings. Their input indicates that the ACCSC accreditation standards overwhelmingly meet the designated federal criteria: the standards are both relevant and allow ACCSC to evaluate the quality of education and training provided by an institution. Only six out of 569 items (1%) had both a low mean and a low level of agreement, indicating that additional study might be warranted. Surveys conducted with other constituents including current students, graduates, faculty, and employers provide additional support that ACCSC's Standards are achieving their goals in terms of institutional behavior and student outcomes.

ACCSC has established two quantitative measures of student outcomes and achievement—a) completion of a program of study within 150% of catalog time to degree and, b) employment within the specific field for which training was provided. These measures are strengthened by calculating over the three most recent years in order to smooth out annual differences, an appropriate set of clearly-defined exclusions are made from the denominator of each calculation, comparison of graduation rate statistics by length of program, and requiring extensive documentation from schools. Taken together, these features provide considerable confidence in the soundness and appropriateness of ACCSC's general approach to establishing quantitative performance criteria on selected student outcomes measures.

Suggestions and recommendations are offered throughout the document and summarized at the end with regard to potential next steps for ACCSC.

Introduction

Every U. S. Department of Education-recognized accrediting agency must regularly review its standards in accordance with federal regulations.

602.21 Review of Standards

(a) The agency must maintain a systematic program of review that demonstrates that its standards are adequate to evaluate the quality of the education or training provided by the institutions and programs it accredits and relevant to the educational or training needs of students.

(b) The agency determines the specific procedures it follows in evaluating its standards, but the agency must ensure that its program of review--

- (1) Is comprehensive;
- (2) Occurs at regular, yet reasonable, intervals or on an ongoing basis;
- (3) Examines each of the agency's standards and the standards as a whole; and
- (4) Involves all of the agency's relevant constituencies in the review and affords them a meaningful opportunity to provide input into the review.

(c) If the agency determines, at any point during its systematic program of review, that it needs to make changes to its standards, the agency must initiate action within 12 months to make the changes and must complete that action within a reasonable period of time.

Before finalizing any changes to its standards, the agency must--

- (1) Provide notice to all of the agency's relevant constituencies, and other parties who have made their interest known to the agency, of the changes the agency proposes to make;
- (2) Give the constituencies and other interested parties adequate opportunity to comment on the proposed changes; and
- (3) Take into account any comments on the proposed changes submitted timely by the relevant constituencies and by other interested parties.

(Authority: 20 U.S.C. 1099b)

The Accrediting Commission of Career Schools and Colleges (ACCSC) contracted with the National Center for Higher Education Management Systems (NCHEMS) to provide external evaluation assistance to fulfill this requirement. NCHEMS generated two final documents as a result of this comprehensive review of ACCSC's *Standards of Accreditation* (01/01/09 version). This document contains the overall summary results including NCHEMS review of the standards, results of five constituent surveys, and feedback on ACCSC student outcomes and achievement criteria. A companion document, *Survey of Member Institutions*, contains detailed methodology and survey results from current ACCSC institutional members of each ACCSC standard and the standards as a whole.

The document has six main sections. The first provides a general overview of NCHEMS reactions to the standards. The second highlights what we believe to be especially good features or practices in the Standards or associated review processes. The third provides a number of broad suggestions for additions or changes based on NCHEMS review. The fourth contains the

summarized results from surveys of constituent groups (member institutions, current students, graduates of schools, faculty, and employers of graduates). The fifth section is a review of ACCSC's student outcomes and achievement standards. Finally, the document concludes with a recommendations section.

General Reactions from NCHEMS

The design of ACCSC's Standards and associated review process follows established practice in institutional accreditation. First, the process is "mission-centered," in that the institution's established educational purposes provide the central starting point for the review. This means that Standards may apply differently to institutions depending upon their mission, and that mission fulfillment is seen to be the primary test of effectiveness. The exceptions here are the two quantitative performance standards—degree completion and employment placement—which are applied identically to institutions regardless of mission. Second, the central mechanism for accomplishing a review is the Self-Evaluation completed by the institution as a result of an internal review. The Self-Evaluation is the primary piece of evidence offered by the institution to support its case for continuing accreditation, "validated" by the visiting team and site visit. Third, the site visit itself is undertaken by peer reviewers drawn from the community of institutions that ACCSC accredits and, while they receive training, they are not professional reviewers. Finally, ACCSC's Standards are organized topically, with each Standard addressing a specific institutional area or function.

This traditional approach to accreditation has many advantages. It is familiar to all participants and the topical arrangement of the Standards is easy to understand. But ACCSC should be aware that many institutional accreditors are moving away from this standard structure toward a different approach to setting standards and review procedures centered much more visibly on institutional effectiveness and the provision of evidence about the achievement of student learning outcomes. For example, the Western Association of Schools and Colleges (WASC) Senior Commission adopted a fundamentally restructured accreditation approach with its *2001 Handbook of Accreditation*. Standards were re-cast in terms of four broad cross-cutting statements centered on institutional effectiveness and the review process was restructured in parallel to comprise two reviews, the first focused on institutional capacity (resources, processes, and organizational structure) and the second focused exclusively on examining evidence of educational effectiveness. We do not recommend that ACCSC undertake a remake of its Standards of this magnitude, largely because perceptions of the for-profit sector in some circles require the Commission to maintain a conservative stance with respect to quality assurance. But the Commission's leadership should be aware of these continuing developments in institutional accreditation practice as it considers its long-term future development.

The ACCSC Standards are also notable for setting an appropriate level of specificity with respect to capacity or performance. This stance allows flexible application to a wide range of differing institutional circumstances while at the same time providing enough guidance for teams to recognize whether or not an institution is in compliance with the Standards. This is a topic that all accreditors have had to face in recent years as alternative instructional delivery modes and teaching-learning environments have proliferated. For example, like many other accreditors, ACCSC has abandoned strict quantitative targets for most resource topics. For instance, the statement on faculty numbers reads simply that "the faculty must be sufficient in numbers to serve the number of students enrolled (p.75)." But specific guidance is given with respect to the

levels of academic preparation and experience expected of faculty teaching courses at various levels. This appropriate balance between flexibility and prescription is a strong feature of the ACCSC standards and should be maintained.

Good Practices in ACCSC Accreditation Standards

Several other aspects of the ACCSC Standards are exemplary and need to be recognized. Among them are:

- Outcome Measures and Standards. ACCSC is unusual among institutional accreditors in requiring strict adherence to quantitative standards of performance with respect to degree completion and employment placement. Despite a general approach to accreditation that is mission-centered, the Commission appropriately demands consistent performance across the institutions that it accredits in these two important outcomes dimensions. This practice is entirely consistent with emerging public demands that accreditors set key performance benchmarks and hold the institutions that they recognize accountable for meeting them. ACCSC is well ahead of the game here.
- Integrity and Due Process Provisions. Compared to other institutional accreditors, ACCSC has unusually thorough provisions for granting institutions due process should they take issue with a decision that the Commission has made. This is probably required because the types of institutions that ACCSC accredits may be exceptionally vulnerable financially to the unfavorable publicity that typically surrounds an unfavorable accreditation action, and the Commission is well advised to grant them as much recourse as possible. This kind of responsiveness is reflected throughout the accreditation process in features like allowing institutions to review draft reports and findings to identify and correct errors of fact or providing feedback on the performance of site visit team members. The strong statement on institutional integrity that occurs at the beginning of the Standards document is also exemplary, and is echoed in specifics throughout the document.
- Mandatory Workshop for New Candidates. ACCSC requires staff from any institution that wishes to be accredited by the Commission to attend an accreditation workshop before proceeding. Most institutional accreditors offer such workshops but stop short of making attendance mandatory. Mandatory attendance signals the importance of knowing ACCSC's accreditation procedures and undoubtedly avoids false steps.
- Pilot Projects. The Pilot Project initiative allows institutions to suspend particular standards or certain aspects of their Self-Evaluation in favor of innovative studies that can benefit them and career education more generally. Many institutions that can easily meet accreditation standards complain that the process wastes their time because it has no connection with their own planning processes or problems that they think are important. Experience with other accreditors that have adopted similar "experimental self-study" provisions suggests that this is a good way to engage such institutions with accreditation. Most prominent among these have been the WASC Senior Commission and the Academic Quality Improvement Project (AQIP) run by North Central's Higher Learning Commission (HLC).

Revisions Suggested by NCHEMS

Our internal review also uncovered a number of areas where we believe that ACCSC's Standards and review processes could be strengthened or improved. The 01/01/09 version of the *Standards of Accreditation* was reviewed. Suggested revisions include:

- Evidence of Student Learning Outcomes. ACCSC is exemplary in its requirement that institutions meet clear outcomes performance standards in the form of graduation and employment rates. But throughout the Standards there is a relative dearth of references to student learning outcomes or the need for institutions to generate and use evidence of student academic achievement. Most institutional accreditors have a prominent requirement that institutions establish student learning outcomes for each degree program and for general education, and provide evidence that these outcomes are being achieved. Barring this, they have frequent references to assessment and the evidence that it yields throughout their standards. In contrast, the ACCSC Standards contain relatively few references to the assessment of student academic achievement. For example, they are noted as the last item in a comprehensive list of topics to be addressed by the Institutional Assessment and Improvement Plan on p.61, are touched upon in the discussion of consortium and contractual arrangements on p.67, and are implied in the list of general education abilities that such courses should impart as listed on p.70. But these are all relatively indirect references. The exception is under Distance Education on p.90 which is the only place in the Standards where specific direction is given with the statement "observable, measurable, and achievable performance outcomes must be identified so that programs...offered through distance education can be compared to programs...with similar subject matter and objectives." The latter part of the statement implies that such outcomes statements have been established for all programs regardless of delivery mode, but we could find no explicit language in the main body of the Standards that actually requires this.

Given the salience of the topic in accreditation policy discussions over the past two years, we would recommend strongly that ACCSC address the requirement that institutions provide direct evidence of student academic achievement as a more visible and integral part of the accreditation process. Institutions should be asked explicitly to a) provide learning outcomes statements for each program, b) report on the methods that they use to gather evidence that these outcomes are being achieved, c) establish expected levels of performance on each of these outcomes, d) report findings against these expected levels on a regular basis and, e) show how the resulting information is being used to improve performance. These goals could be accomplished by establishing a separate standard addressing institutional effectiveness and student academic achievement as some of the regional accrediting organizations have done. Alternatively (and perhaps more appropriately given the current architecture of the ACCSC Standards), strong language about assessment and evidence of student academic achievement could be included in appropriate places in the body of the Standards themselves. Prominent places where such statements belong are in the discussion of the Institutional Assessment and Improvement plan in Standard I and in Standard II under degree program specifications (needed for both general education and program-specific outcomes) and the role of the program advisory committee. Other places where appropriate assessment language might be included are identified in the suggested edits provided in Appendix A.

- Public Reporting. The provision of information to the public was another “hot button” issue surrounding accreditation policy discussion in the wake of the Spellings Commission. ACCSC, like most accrediting organizations, communicates to the general public only an institution’s accredited status, or changes in that status. For more substantive actions like Probation, it provides a summary of the reasons why that action was taken. In the light of growing public interest in this matter, however, a number of accreditors are considering changing their policies to provide more public information about the results of their reviews. Several, for example, are designing short reports on the principal findings of each review. This is something that ACCSC might consider doing as well. Another approach is to require institutions to disclose the results of its most recent accreditation review, as well as statistics on the two student outcomes measures that ACCSC requires and/or results of any assessments of student academic achievement.
- Aids to Assist Team Judgment. Accreditation relies heavily on peer judgments made by site reviewers who assess the Self-Evaluation and directly observe the institution at work in the course of a site visit. But a frequent criticism of peer review is that these judgments lack consistency. More rigorous training of peer reviewers is one way to address this issue. For example, “auditors” retained by European Quality Assurance Agencies to review institutions frequently engage in multi-day training sessions that involve specific scenarios that they are expected to assess. More frequent practice leads to more consistent judgments. In addition, many accreditors are beginning to experiment with tools to help teams judge institutional condition and performance. The WASC Senior Commission and the HLC, for instance, have developed rating rubrics to help assess institutional performance on a number of dimensions. Similarly, aids to help teams come to a collective conclusion about points to include in a report like nominal group technique or multi-voting procedures can help guard against the common problem that the opinion of the team chair or a few vocal members dominates the conclusions of a review. AACSC should review such approaches to see if using them could improve the consistency of peer judgment. Finally, developing a standard format for the Team Summary Report might also promote more consistent reporting.

Detailed comments from NCHEMS about the accreditation document, keyed to specific sections or pages, are provided in Appendix A.

Surveys of Constituent Groups

Methodology. In order to obtain a broader perspective of ACCSC’s accreditation standards, input was solicited from five constituent groups: ACCSC institutional members, current students at ACCSC schools, graduates of ACCSC schools, faculty at ACCSC schools, and employers of graduates of ACCSC schools. Web surveys were conducted with each group. However, the intent of the surveys differed.

ACCSC institutional members were asked to provide detailed feedback regarding whether a standard as written allowed ACCSC to evaluate the quality of education and training provided by an institution, as well as whether the standard was relevant to the educational or training needs of students. Because this survey supplied the comprehensive and in-depth review of the standards, the entire population of ACCSC accredited institutions was included. ACCSC institutional members could be expected to be more motivated and interested in the outcome of this review of

ACCSC's accreditation standards so their desire to participate on the survey was expected to be higher. The final real response rate was 43.8% (see *Survey of Member Institutions* for a more detailed explanation of the response rate).

The other role groups (current students, graduates, faculty, and employers) may have less knowledge of ACCSC or lower interest in a review of ACCSC accreditation standards. Therefore, fewer responses were expected from the outset. Institutions were asked to provide to NCHEMS the names and contact information (email address and/or telephone number) for five currently enrolled students (randomly selected from current rosters), five recent graduates (randomly selected from graduates since 2003), two current faculty (randomly selected), and three employers who hire their institution's graduates (randomly selected). Many institutions chose not to provide this information which reinforced the decision to solicit feedback from a limited number of individuals from each group. Some schools provided information for a single role group but not all groups. In the end, information was gathered from about 130 to 140 institutions for each group.

A sample was chosen from those names provided by institutions to be contacted by NCHEMS for input. The goal was to receive a minimum of fifty responses from each group. In the end, faculty responses numbered a healthy 116, but due to the lenient method for gathering faculty information and low initial responses from schools, these data are not representative and can only suggest areas that might warrant further investigation. The final number of surveys distributed and returned by role group was:

- Current Students – 428 distributed, 64 returned
- Graduates – 359 distributed, 55 returned
- Faculty – 234 distributed, 116 returned (49.6% response rate)
- Employers – 216 distributed, 51 returned

On surveys such as these, respondents are often individuals who either have extremely favorable viewpoints or extremely unfavorable viewpoints, therefore, the sample and responses are not representative of their populations and caution must be exercised when interpreting these data.

These four role groups were asked a more limited range of questions than were posed to ACCSC institutional members that attempted to discover whether selected ACCSC standards influenced institutional behaviors. Space was provided for comments on each of these surveys; comments may be found in Appendix B but caution is advised when interpreting them.

Survey Results. The survey of ACCSC institutional members was completed prior to launching surveys to current students, graduates, faculty, and employers. This sequence allowed NCHEMS to have baseline knowledge regarding institutional members' thoughts about the ACCSC accreditation standards prior to surveying the other groups and to ask some targeted questions of the other constituents.

There were a total of 569 questions posed on the ten surveys which comprised the ACCSC institutional member surveys. Analysis of means and standard deviations for these questions indicate that most of the individual parts of the accreditation standards both help evaluate the quality and are relevant. Means could range from 1 = strongly disagree to 5 = strongly agree. Standard deviation was used as a rough indicator of agreement (a larger standard deviation indicates a wider range of responses were given indicating less agreement). High mean and high

agreement is the best result. High means are good generally. “Low mean” indicates that there are parts of the *Standards of Accreditation* that will need to be reviewed in more depth. Respondents were asked to provide written comments clarifying why they felt that certain parts of the standards were not useful. (A full description and detailed results for each individual standard can be found in the companion document, *Survey of Institutional Members*.)

Results indicate that based on feedback from institutional members the ACCSC accreditation standards overwhelmingly meet the designated criteria: the standards are both relevant and allow ACCSC to evaluate the quality of education and training provided by an institution. Only six out of 569 items had both a low mean and a low level of agreement; these items are related to five standards from three separate sections:

- Section IIb. Program Requirements, Degree Programs, B. Degree Programs, 2. Associate Degrees a.
 - This IS RELEVANT to the educational or training needs of students.
- Section III. Educational Administration & Faculty Qualifications, B. Faculty Qualifications 8.
 - This allows ACCSC to EVALUATE THE QUALITY of education and training provided by an institution.
- Section III. Educational Administration & Faculty Qualifications, B. Faculty Qualifications 9. Graduate Degree Faculty Requirements a.
 - This allows ACCSC to EVALUATE THE QUALITY of education and training provided by an institution.
- Section VI. Student Services, A. Advising and Counseling 1.
 - This allows ACCSC to EVALUATE THE QUALITY of education and training provided by an institution.
- Section VI. Student Services, A. Advising and Counseling 2.
 - This allows ACCSC to EVALUATE THE QUALITY of education and training provided by an institution.
 - This IS RELEVANT to the educational or training needs of students.

Based on these findings that indicate overall agreement and only five standards with low means and standard deviations, surveys to the other constituent groups focused on general use of ACCSC accreditation standards and whether they influence institutional behavior. In addition, these surveys were used to asking targeted questions regarding the five standards that showed some disagreement during the institutional member review.

The topics addressed on these surveys included knowledge of accreditation and ACCSC, admissions, academics, student services and library, faculty and instruction, facilities, and school policy. Findings are summarized below.

Knowledge of accreditation and ACCSC

Graduates and current students were asked how important accreditation was in their decision to attend a particular school. Ninety percent of current students and 87.3% of graduates indicated that accreditation was important or very important to their decision to attend a school. Similarly, employers were asked how important it was to them when hiring graduates of a school that the school be accredited. 88.5% said that it was very important or somewhat important. The majority of employers responding to the survey (44.3%) were acquainted with subject matter accreditors such as ACCSC. Only 21.3% and 29.5% were acquainted with career-related (such as the Distance Education and Training Council) or regional accrediting bodies, respectively.

Both faculty and employers were asked how familiar they were with ACCSC. As might be expected, more faculty (88.8%) responded that they were very well or somewhat acquainted with ACCSC than employers (54.1%). Less than 3% of faculty said that they “had never heard of ACCSC” compared to 18% of employers. In addition, when employers were asked whether they differentially hired graduates of ACCSC-accredited schools, only 5% indicated they would only hire graduates from ACCSC-accredited schools.

Faculty members were asked about their perceptions of the level of rigor required by ACCSC when accrediting schools. Of the faculty who responded, 56% indicated they thought that ACCSC required a high level of rigor; another 35.3% thought that ACCSC required an average level of rigor. We then asked faculty about their perception of the level of rigor for each section of the ACCSC *Standards of Accreditation* document. Of the eleven sections (management and administrative operations, general program requirements, degree program requirements, English as a second language requirements, educational administration and faculty qualifications, student recruitment, admission policies and processes, student services, student progress, separate facilities, and distance education), eight received mean scores indicating a level of rigor between average (a score of 4) and high (a score of 5). The three sections which received lower mean scores (but none lower than 3.5) were also the sections that greater numbers of faculty chose not to answer, likely due to their unfamiliarity with the topic: English as a second language, separate facilities, and distance education. None of these areas were highlighted in the institutional member surveys as areas of concern; therefore, it is not believed that these are problematic areas; rather the responses reflect a lack of faculty knowledge and/or understanding about the area. Finally, faculty members were asked whether ACCSC achieves the right balance among the various components of its accreditation process. 72.4% of faculty responding agreed or strongly agreed that ACCSC found the right balance, and 21.6% were neutral or had no opinion on the item.

Admissions

Both graduates and current students were asked about admissions. Generally graduates gave slightly better scores than current students regarding admissions items. Over 94% of graduates indicated that they were very well informed or well informed regarding their program and what would be required of them, entrance requirements, all costs to attend, and that all necessary facts and data were accurately presented to them. For currently enrolled students, these percentages dropped slightly with 84% or better responding that they had been informed or well informed on these items. When asked about school advertising 85.5% of graduates found it to be accurate and truthful or very accurate and truthful compared to only 68.8% of current students. Employers were asked a similar question about advertising; nearly one-third responded that they

had never seen any advertising for the ACCSC-accredited school. Fifty-four percent of responding employers said that the advertising they have seen has been completely or somewhat accurate and truthful.

Academics

Graduates, current students, and faculty gave input on academic items. The majority of all three groups agreed that schools' academic progress and grading policies were explained clearly to students; 94.5% of graduates, 87.5% of current students, and 98.3% of faculty. Over 80% of graduates (90.9%), current students (81.2%), and faculty (95.7%) agreed that they were applied fairly.

When asked whether the program they were enrolled in was the appropriate length of time for them to learn what they needed to know to get a job, nearly 80% of both current students (79.7%) and graduates (80%) indicated that program length was "just right." Faculty and employers were asked about their level of agreement with the following statement, "the length of programs at this school/by ACCSC-accredited schools produces graduates who have achieved the program objectives and acquired the knowledge and skills necessary for initial employment in their fields." Over 95% of faculty and 70.5% of employers agreed or strongly agreed with the statement.

Student Services and Library

Current students, graduates, and faculty were asked about student services and the availability of the library. The table below shows the percentage of current students and graduates who knew of and had seen a school policy regarding how to address student complaints. 71.9% of current students and 78.2% of graduates agreed that their school followed its student complaint policy. Also in the table below are responses for three role groups about availability of the library/resource center; on a related question over 70% of both current students and graduates agreed or strongly agreed that the library was readily accessible during and beyond classroom hours.

Does/did the school have a policy and procedure for dealing with student complaints?			
	<i>Current Students</i>	<i>Graduates</i>	<i>Faculty</i>
Has such a policy and have seen it in printed material from the school.	50.0%	56.4%	NA
Have heard of a policy but never saw it.	29.7%	30.9%	NA
Never heard of such a policy	20.3%	12.7%	NA
Does/did the library/resource center have hours that allowed you to get there outside of your classes?			
	<i>Current Students</i>	<i>Graduates</i>	<i>Faculty</i>
Hours are/were always adequate.	45.3%	65.5%	61.2%
Hours are/were usually adequate.	28.1%	23.6%	32.8%
Hours are/were sometimes adequate.	15.6%	5.5%	3.4%
Hours are/were rarely adequate.	1.6%	--	--
Hours are/were not at all adequate.	1.6%	1.8%	0.9%
School does not have a library/resource center.	7.8%	3.6%	0.9%

Finally, two questions were specifically posed to faculty because of results from the institutional member surveys. Two of the six items with low means from institutional members were in the section on "Student Services." As a check of these low means, faculty members were asked to provide their level of agreement regarding two standards. For Section VI. Student Services, A. Advising and Counseling 1, 94% of faculty agreed or strongly agreed with the standard; there

was no disagreement. For Section VI. Student Services, A. Advising and Counseling 2, 69% of faculty agreed or strongly agreed with the standard; over 30% of responding faculty either did not select a response category, indicated that their school did not enroll Ability to Benefit students, or chose the “neutral/no opinion” response category.

Faculty and Instruction

All four role groups were asked to respond to questions about faculty and instruction. Current students and graduates alike found their instructors to be good at teaching and explaining the skills they studied; 54.7% of current students and 76.4% of graduates responded that faculty were excellent at this. In terms of whether faculty at ACCSC-accredited schools are knowledgeable in their subject areas, current students (89%) and graduates (98.2%) agreed wholeheartedly that they were. Faculty and employers were asked related questions and also found faculty at ACCSC-accredited schools qualified to teach in their chosen subject areas; nearly 70% of employers and 96.5% of faculty agreed or strongly agreed. These two role groups were also asked whether instructors at ACCSC-accredited institutions had enough practical and real world experience to aid in their teaching; 83.8% of employers and 97.4% of faculty agreed or strongly agreed.

In addition to asking about faculty members’ subject matter knowledge, questions were posed regarding whether instructors at ACCSC-accredited institutions were trained to teach. 76.5% of current students and 87.2% of graduates agreed or strongly agreed that their instructors were trained to teach; and 90.5% of faculty respondents agreed or strongly agreed that they were provided with professional development on teaching and learning techniques.

Only 46% of employers but nearly 90% of faculty members (88%) agreed or strongly agreed that ACCSC-accredited institutions maintained a sufficient number of faculty to serve the number of students enrolled to maintain a satisfactory working relationship with students. 14.7% of employers disagreed or strongly disagreed, and nearly one-third chose not to answer the question or selected the “neutral/no opinion” response category.

Finally, two questions were specifically posed to faculty because of results from the institutional member surveys. Two of the six items with low means from institutional members were from the section on “Educational Administration & Faculty Qualifications.” As a check of these low means, faculty members were asked to provide their level of agreement regarding two standards. For Section III. Educational Administration & Faculty Qualifications, B. Faculty Qualifications 8, 25.9% of faculty respondents agreed or strongly agreed, 23.3% disagreed or strongly disagreed, and 37.2%, the majority of faculty respondents chose to remain neutral or had no opinion about the standard. For Section III. Educational Administration & Faculty Qualifications, B. Faculty Qualifications 9. Graduate Degree Faculty Requirements a, 50.8% of faculty respondents agreed or strongly agreed, 6.9% disagreed or strongly disagreed, and again, the majority (41.4%) remained neutral or had no opinion about the standard.

Facilities

Over 85% of graduates and over 75% of current students agreed or strongly agreed that their institutions provided satisfactory physical facilities, training equipment satisfactory for the education being provided, and enough training equipment for the number of students enrolled in each class. 72.2% of employers responding agreed or strongly agreed that the equipment used

by students at ACCSC-accredited schools was similar to that found in common occupational practice.

School Policy

All four groups (current students, graduates, faculty, and employers) were asked to respond to questions regarding school policy. When asked about published policies with regard to time period for program completion, the majority of current students and graduates had never heard of such policies (see table below). And, although more students and graduates knew about tuition refund policies for students who withdrew before completing their programs, one-third still had never heard of such a policy.

Does/did the school have a policy that you had to finish your program within a time period that was one and one-half times the normal length of the program?			
	Current Students	Graduates	Faculty
Has such a policy and have seen it in printed material from the school.	26.6%	40.0%	56.0%
Have heard of a policy but never saw it.	7.8%	12.7%	17.2%
Never heard of such a policy or did not respond	65.6%	47.3%	26.8%
Does/did the school have a tuition refund policy for students who withdrew before completing their programs?			
	Current Students	Graduates	Faculty
Has such a policy and have seen it in printed material from the school.	50.0%	52.7%	59.5%
Have heard of a policy but never saw it.	17.2%	12.7%	23.3%
Never heard of such a policy or did not respond	32.8%	34.5%	17.3%

Between 20 and 25 percent of current students and graduates who responded to the survey had taken some of their courses at a distance; the majority of graduates who had taken education at distance did not feel that they could compare what they learned in classes offered at a distance and regular face-to-face classes. Current students largely responded that the content was completely or mostly similar as regular face-to-face classes.

Over 75% of graduates found that the placement services when they graduated were mostly or completely similar to what they had been promised when they began their studies.

Employers responded to questions about Program Advisory Committees; 85.3% of employers who responded believe it is very or somewhat important for ACCSC-accredited schools to have independent Program Advisory Committees for each occupation program or each group of related occupational programs as a means to provide the school with an external review. The majority of employers (62.3%) believed that an annual review was sufficient.

Both faculty and employers were asked about the ACCSC required student achievement and employment data from schools. 87.9% of faculty members agreed or strongly agreed with the statement, “the ability of my school to demonstrate successful student achievement by reporting acceptable rates of student graduation and employment in the career field is essential.”

Employers reinforced this finding; over 90% responding indicated that it was very or somewhat important that ACCSC-accredited schools be able to demonstrate successful student achievement. In terms of ACCSC’s quantitative employment standards, 77.1% of employers say that these standards are very or somewhat important to them as employers of graduates of schools. Both faculty and employers were asked to give their perceptions of the level of the quantitative employment standards for ACCSC-accredited schools; 70.7% of faculty and 55.7% of employers believe that these standards are set at appropriate levels. However, over 36% of

employers and nearly 14% of faculty responded that they had no idea because they were not acquainted with the employment standards.

Two of the best indicators of success are whether a current student would choose to attend their ACCSC-accredited institution again if they had to, 81.2% agreed that they would, and whether a graduate would recommend their school to a friend, 81.8% of graduates would do so. Only 64.1% of current students would recommend their school to a friend, but another 25% indicated that they might do so. Current students were also asked whether their school had provided good value for the money that they had paid; 64.1% agreed or strongly agreed. Another good indicator is whether students and graduates are prepared for employment in their chosen fields of education and training. 80% of graduates felt that what they learned in their program matched the job skills they needed and 73.7% of employers felt that graduates were provided the necessary skills. 76.6% of current students responding expected to find employment in their chosen field.

Characteristics of Student and Graduate Respondents

Responses came from a wide variety of disciplines including health professions, business, mechanics and repair personnel, diving, dog grooming, massage therapy, computer and information services and support, and visual and performing arts. General characteristics for current student and graduate respondents are given in the table below.

Length of Program		
	<i>Current Students</i>	<i>Graduates</i>
< 3 months	--	1.8%
3 – 6 mos.	6.2%	7.3%
7 – 12 mos.	42.2%	32.7%
12 – 18 mos.	17.2%	20.0%
18 – 24 mos.	17.2%	23.6%
More than 2 yrs.	15.6%	14.5%
Sex		
	<i>Current Students</i>	<i>Graduates</i>
Male	43.8%	50.9%
Female	54.7%	49.1%
Age		
	<i>Current Students</i>	<i>Graduates</i>
18 – 24 years	29.7%	10.9%
25 – 39 years	43.7%	47.3%
40 - 54 years	17.2%	25.4%
55+ years or no response	9.4%	16.3%
Race/Ethnicity (multiple selections possible)		
	<i>Current Students</i>	<i>Graduates</i>
Asian	4.7%	1.8%
Black	7.8%	10.9%
Hispanic	23.4%	9.1%
Native American	3.1%	3.6%
White	68.8%	8.8%

Review of ACCSC Student Outcomes and Achievement Criteria

In addition to the broader comprehensive study done for federal reporting, ACCSC also requested that NCHEMS conduct a review of its quantitative student outcomes and achievement criteria. The first provides some overall observations about the current criteria. The second

reviews several alternative approaches to establishing standards of performance on these criteria. Finally, the third provides some suggestions about how ACCSC's approach might be improved. (The 01/01/09 version of the *Standards of Accreditation* are the basis for this review.)

Observations. Under Standard VII C, ACCSC has established two quantitative measures of student outcomes and achievement—a) completion of a program of study within 150% of catalog time to degree and, b) employment within the specific field for which training was provided. These measures have been calculated since 1993, which means that the organization has amassed a considerable body of experience in using them. Both of these measures are defined and constructed according to standard practices. The 150% graduation rate measure is very similar to the measure required by the Graduation Rate Survey (GRS) established by the National Center for Education Statistics (NCES). Many of the same exclusions to the denominator are used, and although the ACCSC rate is not confined to full-time students as is the GRS rate, the mechanics of the calculation are essentially the same. In parallel, the employment in field measure is highly consistent with state practices in occupational/vocational education (especially in the community college sector) and with federal reporting requirements established under Carl Perkins. These similarities mean that the measures used by ACCSC are familiar to schools and external stakeholders, and follow sound practice with respect to calculation.

Several additional features of the ACCSC measures are worth noting as strengths:

- The measures are calculated for the three most recent years in order to smooth out inevitable annual differences. This is especially important because many of the schools that ACCSC accredits are small, with a consequently increased risk of noticeable random fluctuations from year to year.
- An appropriate set of clearly-defined exclusions from the denominator of each calculation is used. And while these for the most part follow established federal or state practices, some of them—for example the separate reporting of graduates as “employed, but not in field”—add to the informational value of the measures. The exclusion of graduates who go on for further study and the three-month time window to obtain employment are also strong features.
- Graduation rate statistics are compared across programs of similar lengths, recognizing the fact that programs of longer duration will likely experience diminished completion rates. For a long period of time, these were grouped in six month intervals but this practice has recently been tightened to three month intervals to achieve greater comparability across programs. This is a sound revision and also nicely illustrates the fact the ACCSC is constantly examining and refining its statistical performance measures.
- Extensive documentation is required from schools in order to support their calculations, including student-level detail on any students or graduates who are excluded from each denominator. This level of required documentation of exceptions sets an unusually high standard and exceeds most current federal and state practices in this regard.

Taken together, these features provide considerable confidence in the soundness and appropriateness of ACCSC's general approach to establishing quantitative performance criteria on selected student outcomes measures.

Some Alternative Ways to Construct Benchmarks. ACCSC is unusual among institutional accrediting organizations in that it not only establishes quantitative performance measures that are applied uniformly across all institutions, but it also benchmarks acceptable minimum performance by setting cut scores. The current minimum performance levels are set at one standard deviation below the mean on each measure for the programs falling within a particular length grouping. While this is a common standard used by states and public institutions on such measures, it is not the only way to proceed. In particular, at least three alternatives might be explored:

- **Fixed Standards.** The principal alternative to using a statistical benchmark like the standard deviation is to establish a fixed level of performance on each measure. Consistent with current ACCSC practices, schools that fall below this level of performance would be triggered for further review or otherwise asked to justify their performance. This approach has the advantage of clarity. Stakeholders can quickly understand such an “up-down” standard, while comprehending the statistical concept of a “standard deviation below the mean” can prove more of a challenge. Another advantage of this approach is that the standard remains unchanged over time. The statistical benchmark, in contrast, will move up or down depending on the overall variance of the distribution of scores across schools, which will vary somewhat from year to year. Although these annual fluctuations will probably be small, they could cause a program to fall below the benchmark in a given year with exactly the same performance that that was deemed satisfactory the previous year.

Organizations that use fixed performance standards generally take care to ensure that these standards are set at a level that the majority of their members can actually achieve. These are based on periodical statistical analyses similar to the method that ACCSC uses to set cut scores. For example, if an analysis of the distribution of scores in a given year shows that 73.5% of schools lie above one standard deviation below the mean, a rounded cut score of 75% might be set, and kept in place for the next five years. If a further analysis conducted later reveals that average levels of performance have changed, this fixed standard might be revised upward or downward as necessary.

- **Statistically Adjusted Benchmarks.** Institutional performance on the measures that ACCSC uses may vary a lot because of things over which the school has no control. For example, empirical studies across all kinds of institutions have convincingly demonstrated that program completion rates are affected by the ability levels of admitted students, as well as by demographic factors like the gender or race/ethnicity mix of the student body. Similarly, employment placement rates in field may vary a lot across regions and occupations because of local labor market and economic conditions. Because of this, some states and agencies have established statistical adjustments that take these factors into account. This is usually done through a regression procedure, through which a “predicted” performance is calculated for each school and is compared to its actual performance. If the school places at or above its predicted performance it is considered acceptable, even though this predicted performance may be below the average performance for the rest.

Adopting such a procedure is generally seen as more equitable than a straightforward calculation, in which none of these external factors is taken into account. On the other hand, rendering a procedure like this comprehensible to stakeholders who lack statistical

background can be a challenge. Perhaps more importantly from a policy perspective, the agency could be accused of setting a “double standard” for particular schools, and therefore being perceived as “soft on performance.” As a result, statistically adjusted benchmarks are usually adopted only in areas where it can be clearly shown that background variables have at least as much influence over the outcomes of interest than the quality of instruction at the school.

- **Improvement Over Time.** Finally, some agencies that set performance benchmarks use an additional criterion that reflects institutional improvement. Usually, such a standard is applied on top of existing benchmarks for institutions that are at the low end of the performance scale. The rationale here is that a given program may be below established criteria at the moment, but if it can demonstrate that it is steadily improving its performance, it should be treated differently from schools that are below standard where performance remains constant or declines. For ACCSC, such an additional criterion might be applied to programs that are below one standard deviation below the mean. Alternatively, it might be noted as an additional positive finding in the accreditation report itself, whatever the current level of performance.

Some Suggestions to Consider. We believe that ACCSC’s current student outcomes and achievement criteria are sound. But our review also suggests that these practices might be improved by considering the following suggestions:

- **Continue Current Practice with Respect to Minimum Performance Levels.** Although ACCSC should carefully weigh the pros and cons of the alternatives to the current practice of setting minimum performance levels one standard deviation below the mean suggested in the previous section, we do not on balance believe that any of these alternatives offers a sufficiently significant advantage for it to be adopted. The current practice is straightforward and is already familiar to stakeholders. As noted, explicit adoption of an improvement criterion might be considered for schools that fail to meet the standard. But the current practice of handling these schools on a case-by-case basis seems to be working.

The adjusted performance approach using a regression procedure should only be considered if there is a major reason to believe that factors like student ability or demographics are highly related to graduation rates or that local economic conditions are strongly related to employment placement. We believe that these relationships should be explicitly investigated using ACCSC’s available databases. If the variance explained in the outcomes variables by such factors through a multiple regression analysis exceeds 35% independent of school, adjusting current practices might be justified.

Consider Adding Two Additional Quantitative Performance Measures. Current annual reporting requirements for ACCSC schools include overall student retention and the cohort default rate for federally-insured student loans. While these are not “outcome” measures of the same stature as graduation and employment placement rates, they are nevertheless useful indicators of institutional quality. Good retention is in some measure responsible for high levels of graduation. Because of this, declines in retention performance may provide an early signal of future problems in maintaining graduation rates. In parallel, while cohort default rates are not direct measures of institutional outcomes, they may be indirectly related to lack of student success in the world of work.

At least as important, cohort default rates have in the past elicited active interest on the part of Congress and the U.S. Department of Education. We believe that ACCSC should therefore consider including these statistics in its quantitative performance evaluation regimen, with minimum criteria established in the same manner as for the two existing measures.

- Benchmark Graduation Rate Statistics More Finely. As noted, ACCSC reports and sets standards for graduation rate performance taking program length into account. This is currently done by establishing three-month “windows” of performance for programs, with the minimum standard set as one standard deviation below the mean of the rates for all programs within a given window. These windows were recently reduced to three months from six months because it was felt that they were not equitable for programs whose length was at the upper end of the continuum. The result was clearly an improvement in precision.

But this method might be further refined by establishing a rolling approach to setting these three-month performance windows, with each centered on the program’s own length. For example, a program whose duration is four months current falls in the four-to-six month performance window. Under the recommended revision, a four-month program would be centered on a three-to-five month performance window for calculation purposes, a five-month program would be centered on a four-to-six month performance window, and so on. Such an approach would allow even greater equity in comparing performances and setting performance standards.

- Establish a Policy Governing Exceptions in Setting Performance Standards. In its most recent round of setting performance standards for employment placement rates, ACCSC encountered a situation in which the unusually low performances of only a few programs considerably skewed the overall distribution of performances. Under these circumstances, applying the established calculation method would have artificially lowered the performance standard set. After consideration, a decision was made to exclude these outlying cases from the calculation and recalculate the mean and standard deviation from the reduced set of cases. This is the only time in ACCSC’s history of using these performance measures that it has made such an adjustment.

Given the properties of the data, we believe that this decision was justified. But given the visibility and importance of the standard-setting process in the ACCSC accreditation process, we believe that it would be advisable to establish a clear policy governing the circumstances under which adjustments like this should be made. For example, such a policy might require exclusions from the calculation if the performance of given percentage of schools that can clearly be shown to be outliers affects the mean by more than a certain number of percentage points. Establishing such a policy explicitly would help avoid the perception that ACCSC staff is behaving in an arbitrary fashion with respect to standard setting if a similar situation is encountered in the future.

- Consider Using Students Instead of Programs as the Unit of Analysis for Calculation. Current ACCSC practice uses the program as the unit of analysis in computing performance standards. For example, graduation rates are based on the mean of all program graduation rates within a given program-length window and its associated standard deviation. An alternative way to approach this calculation might be to use the

student as the unit of analysis in performing these calculations. Under this approach, the performance standard would be set for the group of programs in question at one standard deviation below the mean of graduation or employment placement rates calculated over *all* of the students enrolled in programs across the entire group. Arguably, this approach would reflect a more typical “average performance” for ACCSC institutions because it accords less influence to any aberrant performance levels achieved by small programs. This is the primary statistical difficulty associated with calculating any “average of averages” like the approach now used. The only drawback of this approach is that it may be more difficult for institutions to understand.

- Require Standard Public Reporting of All Performance Statistics. While ACCSC assesses institutional performance on its two quantitative outcomes measures against established criteria, it appears to only take action if performance is problematic. This means that the public may be unaware of the actual levels of performance until this is the case. To address this, Substantive Standard VII might be revised to ensure that these two statistics, together with their associated minimum levels of performance, are reported prominently on every school’s website and in catalog materials. Consideration should also be given to including retention and cohort default statistics in these public reports as well.
- Establish a Set of ACCSC School Performance Reports. In parallel, ACCSC might consider developing a publicly-accessible set of standard performance reports on the schools it accredits for communication to the public via its own website. These reports might be designed in consultation with potential students and other stakeholder groups in order to ensure that they are as accessible and as useful as possible. In order to help stakeholders evaluate schools, these statistics might be organized in tabular form. Suggested data elements for these displays include a) graduation rates, b) employment rates (in field and in general), c) retention rates, d) cohort default rates and, e) a range of enrollment characteristics (e.g. demographics, financial aid use, full-time/part-time enrollments, etc.). Wherever possible, these statistics should be reported at both the school and program levels.

To conclude, we offer these recommendations only to help improve an already-sound process of establishing and employing quantitative performance criteria. We commend ACCSC for its current sound practices.

Conclusions and Recommendations

This review was conducted in order to fulfill the Accrediting Commission of Career Schools and Colleges requirement for systematic review of its standards on a regular basis, mandated by the federal government. Overwhelmingly we find that ACCSC’s *Standards of Accreditation* are sound, allow the organization to evaluate the quality of education and training provided by an institution, and are relevant to not only institutional members but students, graduates, faculty, and employers as well.

Specific suggestions and recommendations have been provided throughout this document (including Revisions Suggested by NCHEMS beginning on page 6, the listing of standards which had low mean scores and low agreement on page 9, Some Alternative Ways to Construct Benchmarks on page 16, Some Suggestions to Consider regarding outcome and achievement

criteria beginning on page 17, and specific edits provided in Appendix A). But, these ideas do not give any guidance on how to approach this wealth of data generally.

ACCSC personnel and Commissioners are encouraged to

- Read this document closely giving attention to the many recommendations included in its sections,
- Review the first 40 pages of the companion document, *Survey of Institutional Members*, for an overview of those findings.
 - Use the color coded tables to provide a quick “dashboard” of which specific standards had low means or low standard deviations, indicated by red.
 - If the means and standard deviations in the “dashboard” indicate a potential issue from your perspective, then refer to the in-depth data for each standard including comments which are provided in the appendix of the *Survey of Institutional Members*.
 - For the six standards which had both low means and low standard deviations, refer to in-depth data for each standard that is provided in the appendix of the *Survey of Institutional Members* document, specifically the comments given by members. These will help frame whether a change is needed.
- Keep and refer to the *Survey of Institutional Members* in the intervening years (until the next comprehensive review) as questions or issues arise about specific standards. Data provided in the appendix about individual standards will likely provide a suitable “jumping off point” for discussions including whether there was disagreement in 2009 about the standard and any useful observations or suggestions made in the comments about the standard.

Appendix A

NCHEMS Detailed Review of ACCSC Accreditation Standards

NCHEMS Detailed Review of ACCSC Accreditation Standards (version 01/01/09)

To amplify the findings of our review, this section provides comments on the Standards keyed directly to particular pages of the text.

- p.1—The Preamble is particularly strong. This is a good opening for the Standards.
- p.2—The second paragraph needs to discuss student learning outcomes and evidence of student academic achievement, as well as the two other outcome measures.
- p.9—The reference to “typewritten” in E.1.a. seems a bit anachronistic.
- p.14—ACCSC staff participation in visits to help ensure consistency is a particularly good practice.
- p.15—The material on “On-Site Evaluation” under H. seems out of place. It might be more useful if it was placed earlier in this section.
- p.16—As noted above, a standard format for the Team Summary Report might be considered.
- p.32—The annual reporting process and, especially, the verification of a random sample of these reports, are exemplary features of ACCSC’s process.
- p.57—It appears that there is a word missing in f. at the top of the page.
- p.61—As noted, the assessment of student learning outcomes needs more amplification and discussion in the second paragraph and, indeed, throughout this section.
- p.62—Under E.2. should reporting on cohort default rates be incorporated into the core performance measures, with explicit standards set?
- p.64—The discussion of the role of the Program Advisory Committee should address their role in looking at the program’s approach to assessing student learning outcomes, examining results, and determining how well learning objectives are being attained. Some institutions also have program advisory committees look at examples of actual student work products as part of their duties. Requiring this might be considered. This role, if adopted, would carry over into all of the language on p.65.
- p.68—The discussion on Transfer of Credit might state explicitly that ACCSC adheres to the principles established by CHEA’s Higher Education Transfer Alliance.
- p.70—The discussion of courses in the middle of the page needs references to the assessment of student learning around program-specific and general education components. Assessment references should be plentiful in this section.
- p.75—The requirement under B.4. that instructors be trained to teach is exemplary.
- p.85—As noted, the whole section on student achievement that begins on this page needs to incorporate requirements for establishing student learning outcomes, reporting on how evidence of their achievement is collected, establishing expected levels of performance, and reporting actual results.

- p.90—As noted, the language of B.3. that describes learning outcomes and their assessment is good. Language like this should appear in the main body of Standard II on Programs as well.

Appendix B

Current Student, Graduate, Faculty, and Employer Survey Comments

Current Student Survey Comments

Note: the sample and responses were not representative of the base population and caution must be exercised when interpreting these data.

Question 33: If you have other comments regarding Your School and its accreditation, please enter them here.

I attended many schools in the course of my life. This is the very best I have ever attended.

I feel that [Name of School] is in a constant state of transition making it difficult to gain trust in their systems. Some of the faculty is quite knowledgeable and skilled at educating; others seem to have no educational experience whatsoever. I have been concerned with the lack of communication between the students, staff, faculty and administration. Also, at times for the cost of this program, at times it seems as though there should be more amenities that are customary to a traditional college (i.e. reliable internet, extended library hours and library inventory, better dining services and options for those off-campus students, refunds for classes not taken.

The locksmithing program is an excellent program! I have graduated and had the skills needed to begin my own business. I am happy to say I am earning a living!

I feel that this school should provide us with more details in regarding school loans and explained better. If I knew the cost I would have not attended this school

[Name of School] is awesome. [Name of Person #1] is the best teacher I have ever come across and should receive an award for her teaching. I will recommend [Name of School] to whoever will listen. They should have a program where people who went there and refer the school should get rewarded. [Name of Person #2] is a great guy and has a wonderful school and should be proud of it.

I wish I never heard of [Name of School]...It was the worst mistake of my life attending this school the best part was the 200 hour externship at the hospital where I realized the school was a joke....

Make sure they have all the materials they need for start of each semester. Let you know you have to buy more books because we finished school in the next year. Didn't keep night classes in the loop of things, never had are pictures taking for any advertising or the school.

My experience at [Name of School] was wonderful. The teachers, staff, and classes were exceptionally great

The majority of the class and I were incredibly disappointed with the lack of professionalism, and the curriculum during our year on [Name of School] campus. The money we paid was NOT equivalent with the experience we received. Would never recommend program, perhaps the school itself is another story.

I just think, the program was rush through. The tests were not updated with the books giving to the students. Need more time for anatomy. Need more pictures and posters on wall in class rooms, need updated human body parts, like the brain, and the heart, and bones. And more class room projects.

I decided to attend [Name of School] after visiting several other schools in the area nearest my house. I drive over an hour to attend this school. The education is the best there is out there! I can't say enough good things about this school. I love it and recommend it to all that I come across that are interested in the massage profession!

They don't participate of Financial aids for students that already used it at the university and it is difficult to study if you do not have the money for that course you don't have any help from them.

I did not receive all the classes that were listed in curriculum, when I asked about them I would advise that I would receive the class and it never was offered and I know it is not offered to many other students, especially to those in the evening & Saturday classes. Also, when I received my Transcript there were classes on them that I have never received. I learned a great deal, but I feel I paid a great deal and did not receive what was offered. I could go on but I feel for the amount of money that it costs, you should receive what was promised, and unfortunately most of the students are young and have no idea what they are supposed to be receiving.

The small boats program that I was in was great as were the teachers, but my friends who were in other programs say that they wasted their time and regret their decision to attend. They struggled to find one positive aspect of the entire experience.

In my opinion, [Name of School] is too lenient in their grading systems; I believe to keep their graduation rate high enough to maintain accreditation. I think it would encourage harder work, better work and healthy competition if there were stricter guidelines and more stringent standards built into their grading system. Basically, if you show up and turn in your assignments, you pass - there is very little distinction for quality of work. Also, there are disciplinary issues, where it seems there are virtually no ramifications for students with behavioral problems, or total disregard for the curriculum and/or other students in the class. The school seems hesitant to apply disciplinary action. Also, to clarify the teacher questions - I had VERY knowledgeable teachers and loved them, although it did not seem like there was consistency between the teachers I had and other teachers at the school, which led me to answer 'disagree' in the question about teachers being trained. Overall however, my experience at this school was wonderful and I am working in my chosen field.

I was very happy with the school once I had started , but it was brought to my attention that the credits that I have been taken for the past 2 years no other school would take them and this information was never informed to me until my last month in school. I was told when I registered that once I finished in [Name of School] I would be able to go to any other school if I wished and it turned out they were never cleared with me. this school has great teachers and staff but they were more interested in getting more students in their school then the student's academic interests (quantity not quality is what they were after) !!! Now that I have completed this school and its program I am left owing \$26 thousand dollar and unable to go to any other college to continue my education because no school would take my credits from [Name of School]. I am very upset and disappointed in the school and as myself I have several fellow class mates that are in the same scenario.

They do a very good job.

Overall I felt this was a good school that provided me with a good education that I need in order to perform the career I am seeking. However, some of the teachers seem ill prepared for their

subject areas and for teaching in general. Also, for the money that it cost to attend such an art school, I would have like to see nicer class rooms, more amenities, and some fashion-specific rooms for working outside class hours.

I think that special exceptions were given to some minority students under the fear that she would cause trouble unless she got her way. I know for a fact because I overheard administration acknowledge she did not meet grade requirements to graduate but was allowed to anyway. Also she was allowed to make up days that were unexcused for the same reason. She also did not pass her state exam and I believe that it was an injustice to the school and her because she was allowed to graduate and wasn't ready or prepared for some of these reasons. I also think some administration staff have high opinions of themselves and tend to bend or break rules as they see fit on a personal basis if you are one of the ones the like. I was one that they liked but never tried to take advantage of it but I did see it in several occasions.

[Name of School], in particular the Piano Technology Department, delivers.

Great school, great time spent. I am almost a graduate and I am excited to have seen the school grow.

On paper the school is a good option. In fact, I was promised certain things that were not delivered. They did not keep track of what I was taught and what I needed to learn to complete the program I chose. The teachers did not seem to be governed and a lot of personalities ran rampant making it hard to concentrate on what I was there for. The school director is charming but does not act appropriately in situations concerning the students and teachers. I feel that I paid twice what it was worth and received 75% of what I was promised. I could not have opened my shop without the instruction I received but I feel I could be a much better groomer had I chosen to go to another school. There are so many items I could list here but don't want to 'rant'. It was just not a professional school and I would never recommend it to anyone. I recommend the teachers to organize the programs differently and to make sure that the levels are treated differently. My biggest complaint is that I paid for the Professional Pet Stylist program. I was to receive certain training that was not available to people in the lower (less cost) program. Then why did everyone sit in the same seminars and receive the EXACT same training and lectures? I feel I could have paid for the standard package (and saved over \$3000) and received the exact same training. This stems from lack of organization in the student lectures and training. They treat everyone as the same level. It was extremely frustrating. I am available if you have questions.

Graduate Survey Comments

Note: the sample and responses were not representative of the base population and caution must be exercised when interpreting these data.

Question 32: If you have other comments regarding Your School and its accreditation, please enter them here.

The school has improved quite a bit since I was there. I am extremely disappointed with the education I obtained for the price I paid. I started there when the school first started before becoming accredited. They had entirely too many kinks to work out. I, as do many of my classmates, do not feel that we received the type of education that is being provided to the students now.

[Name of School] did a great job of translating what they marketed in their program brochures. On my job I have been able to use 90% of what was taught in class. The other 10% I have decided not to pursue as I prefer still-graphics over animation.

Overall [Name of School] is a great school. It just sucks that everyone I graduated w/ was trying to get an IT Job in our small town. It's hard. So people had to move elsewhere or not even work in their field at all. 2 students I know of are working at gas stations and they were 2 of the best. I'm one of the fortunate ones that found a job 2 years after I graduated.

Once I completed my externship the school would not give me my certification stating that I owed them 1650.00 unemployment paid their half and I received a grant for the rest, when I asked them my balance they told me 169.00 which I paid them they claim one of my classes they did not realize that I took this class how could that be all the classes are part of the medical assistant curriculum, so I never got my certificate or a job in that field.

All accreditation issues were included in the written handbook that was provided at orientation, and the issues were all explained verbally during that time.

IF I HAD TO DO IT AGAIN I WOULD GO TO [Name of School] AGAIN. ALSO THE JOB PLACEMENT PROGRAM IS BETTER NOW THAN WHEN I GRADUATED. FOR ANYONE REALLY WANT TO GO INTO THE MASSAGE FIELD I HIGHLY RECOMMEND THIS SCHOOL

My final teacher ([Name of Person]) was very disrespectful and often showed up to work drunk or would drink at lunch. He was very judgmental and leveraged his teaching position against students and their potential to gain employment (was not looking out for the best interest of the students). He is still in the same position and I would not recommend this school solely because of this instructor.

School equipment was very old and usually broken. The dean and the registrar are completely unapproachable and it is either their way or the highway. I was president of the honor society and felt that anytime I had to meet with either of them I was treated no better than someone who never came to class, put forth any effort, and eventually would drop out. This school is very misleading about the accreditation it has and did not say any of the general education courses would not transfer even though I have (2) AAS degrees now I have to start as a freshman anywhere else.

The [Site Name #1] campus is really the only campus that I was impressed with. I'd definitely recommend that facility! I haven't been there in almost a year and still call on them from time to time and they are more than willing to help. I felt like I was taken care of. The [Site Name #1] campus however, my 4th quarter out of was graded completely different and expectations from the instructor were very different. So much that I had almost perfect scores until that quarter. The faculty were rude and not approachable. I would never recommend studying at that facility, only [Site Name #2]. I also felt that students that had completed their first 3 quarters at [Site Name #1] were very far behind me and my fellow students from [Site Name #2]. I definitely think that [Site Name #2] students had a much better understanding and preparation to go out into the field. Matter of fact, I'm sure that we were the first students to get hired directly from school!

This school, [Type of School], provides what I believe to be the best possible training in this field. I have worked almost steadily since graduating two years ago, and find that I am very well prepared. The program is stimulating, comprehensive, and just plain fun in spite of all the hard work and dedication required. The faculty is supportive and nurturing.

I loved my time at [Name of School]; it was the perfect choice for a serious professional career changer like me. Highly recommend it for those looking to pursue culinary goals.

n/a

I have been out of school for just over a year, and I am already halfway to earning enough equity points to join the Union. My career has taken off thanks to the skills I learned at the [Name of School].

Great all around school.

Since graduating I find that many co-workers around me have no clue about many things that I learned in my school, and have yet to be surprised by anything I've seen or had to do. I think that [Name of School] is head and shoulders above the competition from my experience and would recommend it highly. The caliber of graduated student is definitely higher from everything I have seen thus far and expect to see.

The school and teachers were very knowledgeable and ready to help with any questions that we had. It was a very well rounded and informative education. I am very happy with the education I received and would gladly share with anyone the experience I had.

[Name of School] was a perfect fit for me. In my current job I have been better off than those attending larger schools. I have 3 other people I work with that went to this same school and all of them feel the same way that I do.

Overall, good experience... many programs that interest me.

This survey is a pain in the ass

[Name of School] was very helpful with obtaining my educational degree through its structured system. The professors at this college were not only honorable, they have experience in their field and well informed of any current changes, of which, made them very astute toward providing up-to-date and relevant material. I am very grateful to have attended [Name of School].

The school and its instructors did an excellent job in preparing me for a carrier in the marine trades.

I met some great teachers here who really knew what they were teaching and have to this day stayed in contact with me and helped me with any questions or problems I might have had in my field of work. Other teachers, though they may have at one point been very skilled in the field, have not changed with time and aren't quite on the same page with what is going on now. Standards for student's work do not feel like they are as high as they should be. Some work handed in showed little skill or comprehension of what the project was trying to teach but would continue to pass because it met the deadline. Not the teacher's fault so much as students not really meant to be in this field but slipping through on minimum effort and skill. There is no help in job placement. I worked several jobs outside my field as well as doing small freelance gigs before getting lucky and landing a steady job in my field. Most people in my class I'm still in touch with do not work in the field. Granted some of them it is purely because they have not tried and the economy is poor, there is still no job placement in the school like they claim there is.

No

A good school with the possibility of learning more after graduation which is important.

The experience was a good one and I am glad I did it. My only complaint is that some teachers seemed very unskilled. This was not true of all teachers though. The teacher who taught most of my Computer Science classes, [Name of Person], was the best I have ever had. He is an amazing teacher who really cares about his students. The school should do whatever it takes to keep him there.

This school is rapidly developing as is the technology in today's society. I believe the school is doing a great job at keeping up with current trends and skill requirements of the current job market. It deserves this accreditation.

Faculty Survey Comments

Note: the sample and responses were not representative of the base population and caution must be exercised when interpreting these data.

Question 22: Please enter any additional comments you have about your school and its accreditation by the Accrediting Commission of Career Schools and Colleges.

A big problem is that as an instructor my success is based on my ability to retain the student no matter what. This dilutes academic standards and encourages moving the student along to avoid being criticized by administration.

Because of the requirements for completion and graduate placement, I feel it would be beneficial to administer a placement exam prior to admission.

Thanks for asking!

Not available

Employment in our field is sometimes not the student's goal and there should be a method for them to opt out of the employment count.

[Name of School] is extremely supportive of its faculty and student population. Rules and regulations are available to all and are frequently reinforced within the classroom setting. There definitely is a chain of command in regards to problem solving. [Name of School] is a great place to work.

All questions pertaining to Masters Level Degree Programs I answered as Neutral because my campus does not offer those programs and as a Part Time Adjunct Faculty I am not familiar with all the programs the other campus offer.

[Name of School] fails to hold students in the only degree granting program (RT) to a level of rigor to ensure quality graduates. [Name of School] is more interested in NOT dropping a student that lacks in ability or proper study habits; preferring to past students and make accommodations, up to and including changing failing grades to passing, so as to avoid losing the tuition revenue that would be associated with dropping students for lack of academic progress. In short, [Name of School] is more interested in revenue performance than in the clinical/ bedside performance of our RT graduates. Many area employers, i.e. large hospital facilities, refuse to even interview [Name of School] RT graduates due to this reputation.

Last year, our school went through the accrediting process, which was quite arduous. We were very pleased with the high marks we received from our students and their overall satisfaction with our school. Apparently, we are doing things right and our students appreciate our efforts.

We are doing a great job. We strive to meet and exceed standards thus providing solid education for our students!

Accrediting commission was excellent to work with when they came. Ours is a massage school, it is very hard to track students continually after they leave, this occupation is one that is very diverse, and it is used as full time job and or an added part time skill as they keep their regular jobs. People are too mobile now and it is hard tracking them. We give them an excellent education; it is up to them to use it. With the economy as it is I think it is unfair to expect schools to chase students around after they graduate. We know they have an excellent skill to always

take with them and use as needed. No one can ever take away knowledge or the skills they learn, it can be used all the rest of their lives as they need it or choose to when they need it.

Placement requirements are not always appropriate and the commission should be more flexible with these requirements. Our mission has been to serve our state's most severely disabled individuals. We should not be compared to schools that have entrance requirements and non-disabled students

ACCSC is an excellent program for educational institution evaluation and accreditation. A strong standards program is necessary to insure quality programs and instruction.

As a Graduate of our program, I am proof that our School really can improve people's lives.

The same requirements for colleges should be applied to Career Schools. I DON'T feel that this is done.

I have administrative experience applying both HLC and ACCSC standards. I am also an AQIP peer reviewer. I like the quantitative standards ACCSC stipulates. I believe ACCSC accreditation is better for my college, but if ACCSC doesn't get recognized by CHEA, we will need to look elsewhere for accreditation because some of the employers we work with are writing tighter policies for tuition reimbursement, as are transfer institutions.

This school is a branch of a main school. Our initial accreditation was October 2008 and we are already in the process of a re-accreditation. The team visit was last July and we feel it is too soon to do this entire process over again. I have personally been involved with the main school re-accreditation and felt the team was overly strict and almost disrespectful. The visit at our new branch site was very thorough, yet very professional and a very pleasant experience. The commission has been very helpful whenever we need assistance over the phone with questions and explanations. Thank you for your support!

There are several instances where there are inconsistencies in the application of the standards as written vs. how the standards are interpreted. That is, rigid adherence to a part or sub-part of a standard and then disregard of another related portion of the same. E.g. the placement rates (a standard of 70% placement) is clearly outlined within the ACCSC standards. Further reading within the same section outlines a mechanism for explaining the failure of an institution to meet this standard. Unfortunately, any attempt at further explanation is treated with disregard. Even more unfortunate is the bureaucracy that is set in motion as a result, wasting time and resources that would be much better spent actually serving our student needs.

My school is continuously improving services and thriving to give each student what is needed for their success. **OUR SCHOOL IS DEFINITELY STUDENT ORIENTED!!!**

Both Institutions are basically important in relation to academic aspects with each other.

I'd like to see accreditation be more dependent upon student getting licensed and or certifications

As a faculty member we strive to uphold all accrediting requirements. We have instructional meetings on standards.

I feel that our accreditation is appropriate for the school. It meets the standards that I would want in entering a school for my education. Referring to the time length for courses and completion, requirement for teaching/instructors, and staff. Meeting the needs for students in preparation for employment with placement assistance, financial aid, schedule of classes and class size. The

curriculum set for each course and certification is well diverse and thoroughly comprised with educational standards needed for professional licensing and certification as well as diplomas for students.

I believe the standards set by ACCSC have helped this school improve at a faster pace. ACCSC sets in motion a desire by the school administration and faculty to be leaders in the industry. When you are held accountable for your action and results, it helps all involved realized that teaching or working at a school is not simply a job, but a privilege and communal responsibility. I am proud to be a part of this school's responsibility.

Thanks, I hope I have helped

LET GOOD SCHOOLS THRIVE AND CLOSE BAD SCHOOLS. THE BIG PUBLICLY TRADED SCHOOLS SHOULD BE LOOKED AT MORE CLOSELY!!!

I believe that the ACCSC has helped my school and others like mine remain and continue to grow as institutions of higher learning due to the standards that are set by the ACCSC.

No comments at this time

I feel our school follows the guidelines exceptionally well when it deals with both the educational standards set and the support services required to help students become successful in their chosen career paths.

Quantitative employment standards should be reviewed and possibly adjusted to take into account similar economic and employment issues we face in 2009/2010.

It is an accredited school and I am happy with the school performance, their concern about the student achievement is a plus. The faculty and staff are working together in the best interest of the students. They want the student to succeed, to accomplish their goals and become professionals.

At this time I don't have any additional comments

None

I strongly believe that our school takes a serious and proactive role in assuring our standards exceed the requirements of ACCSC. For a small school, I believe that our ability to produce a well prepared student is enhanced by the many tools and student assistance personnel. I have always had the sense that [Name of School] cares about each and every student and employs programs to enhance the success of all of the students.

It is a hard working school that cares about each student and their performance levels.

The employment standards while important always prove problematic for us. A portion of our students come for the experience and being a very small school, these one or two individuals skew our employment rates. Also the focus on the academic course work for the instructors seems disproportionate to their work experience. We had on individual who had thirty years of experience in all areas of our trade. The ACCSC was concerned that he did not have college level course work to qualify him to teach the drafting element of the program, despite his demonstrated teaching and work experience. The focus on degrees for instructors in my trade, wooden boat building actually hampers my ability to hire the most skilled teachers. I would like to see more flexibility in the degree requirements for qualified individuals.

Employer Survey Comments

Note: the sample and responses were not representative of the base population and caution must be exercised when interpreting these data.

Question 17: Please enter any additional comments you have about ACCSC-accredited schools here.

I would like a higher level of effort for open dialog between the school and its participating externship locations or possible employers

Need to require industry standard certifications in addition to school graduating requirements

No additional comments.

[Name of School] does a great job training and preparing students for an entry level technician career. Their staff, facilities, and equipment are second to none. This is why our company spends a lot of resources when it comes to recruiting their students. It has been a mutually beneficial relationship for roughly 13 years. The [Site Name] campus for the past 3 years has been the leader in terms of number of hires among the vocational schools [Company Name] recruits out of. As a company we are privileged to be an employer of [Name of School] graduates.

We do get students who have the knowledge but no "real world" experience....I wish the schools would emphasize a little more on internships or paid work related jobs before they graduate. I think a lot of these schools just try to push students out without the hands on professional work environment experience that I think is important for students to market themselves after completing the program.

I really do not know the answers to many of these statements--I have had good luck with many of your students--and it helps me to have externs to see if they are a fit for us--My staff is very helpful--because they spend 6 weeks with them--so they want someone knowledgeable and will carry their load

My experience with the ACCSC accredited school was not positive. We have discontinued the training and hiring of such students due to a history of unreliable, unprofessional graduates.

I appreciate the quality of students your colleges accommodate to our community. Continue to stay on the cutting edge of continuous knowledge. As you know, this will allow your student to become more marketable in such a high competitive market.

I am going to be very honest and say that I am not familiar with ACCSC accreditation - I deal with several area learning institutions, but do not know if they participate in the ACCSC accreditation. I am sorry I cannot help you out here.

The problem is as follows: schools that are required to graduate and employ their students in order to keep their accreditation will help sub-standard performers graduate and enter the workforce in order to keep their percentages up. This practice hurts the field overall (by graduating poor performers and placing them in jobs they likely will not be able to keep) and also harms the academic reputation of the school itself. This is in direct contradiction to the point of accreditation itself. While accreditation is necessary for the success of the institution and to insure appropriate standards, using graduation rate as the measurement only truly indicates that the school has developed methods to pass enough students (and too often by lowering academic standards).

I am not familiar with the ACCSC. Sorry I cannot be of more help.

I believe stricter guidelines for entry and into the programs need to be in place. I was in a class with a student who could not read, and was training to be a dog groomer. In addition I have been a graduate alongside others who hardly came to class and but they graduated because they had another paying student coming their way to their seat. It is not a school first but a business first.