

# CALL FOR COMMENT ACCSC

To: ACCSC-Accredited Institutions and Other Interested Parties  
From: Michale S. McComis, Ed.D., Executive Director  
Date: December 13, 2018  
Subject: Proposed Revisions to the *Standards of Accreditation*

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The Accrediting Commission of Career Schools and Colleges (ACCSC) presents the following topics for comment by the ACCSC membership and other interested parties:

- **Safety and Emergency Preparedness Standards**
- **Graduation and Employment Chart Glossary: Unavailable For Employment**

The Commission welcomes and encourages the comments of ACCSC-accredited institutions and other interested parties on the topics listed above. The Commission encourages all member institutions and interested parties to read carefully the Commission's request for feedback and to submit comments and recommendations for consideration by the Commission. The Commission will give careful consideration to the comments received, particularly those that reflect thoughtful insights which take into account what is best for the entire ACCSC membership and support and enhance ACCSC's mission.

With regard to the proposed revisions, after considering the written comments, the Commission may adopt the revision as proposed, adopt the revision with additional changes, defer action for further study and consideration, or reject the proposed revision. If the Commission adopts the revisions, ACCSC will establish an effective date allowing reasonable time for institutions to come into compliance and will announce the revision via an *Accreditation Alert*.

All comments are to be in the form of a PDF document on letterhead with the signature of the commenter. Please send all written comments to the attention of Michale S. McComis, Ed.D., Executive Director, via e-mail to [mccomis@accsc.org](mailto:mccomis@accsc.org). Written comments regarding the Proposed Revisions to the *Standards of Accreditation* are due by **January 15, 2019**.

For assistance or additional information regarding this Call for Comment, please contact Michale S. McComis, Ed.D., Executive Director, at 703.247.4520 or [mccomis@accsc.org](mailto:mccomis@accsc.org).

## **Proposed Revisions Focusing on Safety**

### **Background**

Recent events on school campuses across the country led Commissioners to inquire as to what ACCSC requires of its institutions with regard to student safety and emergency protocols. After all, the Commission has always had an expectation that schools are safe places for students to attend. The answer is that while safety is addressed in the *Standards of Accreditation*, emergency preparedness is not. In addition, while safety is addressed, the focus has been squarely on the safety of the building and the equipment with expectations that institutional facilities meet state and local building and safety codes and protocols.

Up to this point, the Commission has not felt itself in a position to set specific standards in the area of school safety and emergency preparedness instead relying on its state and federal triad partners, and

jurisdictional partners to set appropriate standards in this area (e.g., building safety requirements vary widely from city to city). Moreover, the Commission has left personal student safety as a specific matter in higher education to other agencies whose requirements have evolved and have become far more highlighted – for example, the Jeanne Clery Act (see: [The Clery Center](#)). ACCSC is also aware that the U.S. Congress, U.S. Department of Education, and state agencies have continued to establish laws and regulations around the equitable treatment of students and student safety at college campuses as new challenges and threats have arisen. As such, the Commission understands that many schools are already adequately engaging in safety and emergency preparedness planning.

However, the current reality is that safety and emergency preparedness in schools has reached a level that the Commission believes warrants additional focus by ACCSC as a means to ensure this area is addressed by all ACCSC-accredited school. In this sense, the Commission concluded that additional attention to student safety and emergency preparedness in the *Standards of Accreditation* is appropriate and could contribute to saving lives. Accordingly, the Commission proposes the following revisions to the *Standards of Accreditation*.

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Original proposed new text in **Red, Bold, and Italic** print and revised new text in print. Proposed deleted text in ~~Blue Strikethrough~~.

## CHAPTER 2 – SUBSTANTIVE STANDARDS

### SECTION I – OWNERSHIP, MANAGEMENT, AND ADMINISTRATION

#### B. Institutional Assessment, Improvement, and Planning

2. The school must demonstrate institutional assessment and improvement goal setting, benchmarking, and implementation activities appropriate to the size and scale of the school’s operations in the areas of management; fiscal condition and budget; administrative policies and practices; **emergency preparedness**; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes.

#### F. Institutional Name ~~and Physical Facilities~~

1. A school’s name must be approved by the applicable state agency(ies) in which the school operates.
2. A school may use the term “University” in its name only when such use has been approved by the appropriate state authorities and upon approval by the Commission after the following elements have been demonstrated:
  - i. The school offers at least one graduate-level degree;
  - ii. The school offers diverse schools of study with a comprehensive learning resource system to support those fields;
  - iii. The school is comparable to other schools with university status; and
  - iv. The school has an established professoriate with a commitment to scholarship.

### **G. Physical Facilities and Emergency Preparedness**

31. All facilities owned or controlled for administrative, instructional, and housing purposes must meet fire, safety, and sanitation standards required by appropriate regulatory authorities.
42. The school's physical facilities must be sufficient in size to create an effective and suitable learning environment.
3. ***The school has a written emergency preparedness plan that is part of the school's institutional assessment and improvement planning activities, is made available to all staff and students, and includes the following elements:***
  - i. ***Emergency scenario identification and concordant action plans;<sup>FN</sup>***
  - ii. ***Evacuation and lockdown procedures;***
  - iii. ***Communication protocols for sharing information with appropriate parties during and following an incident;***
  - iv. ***Orientation for students; and***
  - v. ***Regular training for staff and faculty.***

*<sup>FN</sup> Typical scenarios that should be addressed to scale include, weather-based events; fire and incendiary-based events; water-based events; events that pose a danger to students on or near campus; visitor protocol and campus intrusion; medical emergencies; physical and cyber threats; and acts of violence. By way of example, the plan's scale for weather-based events will vary depending on geographic location and for incendiary-based events will vary dependent upon whether flammable materials are maintained on the premises.*

### **Graduation and Employment Chart – Glossary: “Graduates - Unavailable for Employment”**

**Background:** The Commission has been considering an issue that came up from several institutions inquiring about applying for accreditation with ACCSC – specifically institutions that recruit and train significant percentages of international students that are required return to their home country after graduation. Because ACCSC has a waiver allowance in such instances, these schools would have virtually no employment statistics to report. Thus, a significant outcomes metric would not be available to the Commission when making accreditation decisions for these schools as those schools would be unable to demonstrate that a high proportion of its students obtain employment in the field for which trained, as required. The Commission also considered that if a school can recruit and enroll a significant number of students from outside the country, then it is reasonable and appropriate that those schools should track the employment outcomes for those students when they return to their country of origin. Lastly, the Commission considered that the intent of this classification is for any student ineligible for sustained employment in the country and not just graduates who return to his/her country of origin after graduation. Therefore, the Commission proposes the following revisions.<sup>1</sup>

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<sup>1</sup> The Commission asks that comments on this proposed revision include rationale for what implementation timeframe the Commission should consider.

Original proposed new text in **Red, Bold, and Italic** print and revised new text in print. Proposed deleted text in ~~Blue Strikethrough~~.

**Graduates-Unavailable for Employment:** This category removes from the employment rate calculation graduates who fall into one of the following categories: death, incarceration, active military service deployment, the onset of a medical condition that prevents employment, or international students who ~~have returned to their country of origin~~ **are enrolled on the basis of a student or work visa and are ineligible for sustained employment in the United States post graduation. If international students as defined here represent a majority (i.e., more than 50%) of the Total Starts (Line 5), then the school may not use the “international student” exclusion.**