

## ACCSC ACCREDITATION ALERT

**To:** ACCSC Accredited Institutions and Other Interested Parties  
**From:** Michale S. McComis, Ed.D., Executive Director  
**Date:** March 21, 2019  
**Subject:** **Vote on Proposed Revisions to the ACCSC *Bylaws* and new School Commissioner Election**  
**New Revisions to the *Standards of Accreditation***

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### Vote and Election

#### Proposed Bylaws Revisions Vote:

The Accrediting Alliance of Career Schools and Colleges (dba ACCSC) proposes revisions to its Bylaws in the following areas:

- Section 1.11 – Officers
- Section 1.06 – Term

#### ACCSC School Commissioner Election:

The Accrediting Commission of Career Schools and Colleges has established a slate of candidates for election to serve a four-year term as an ACCSC School Commissioner.

#### Voting on the Proposed Revisions to the *Bylaws* and Election to the Commission:

On March 26, 2019, each ACCSC-accredited member institution will receive an e-mail from ACCSC with a website link and login instructions to cast its vote in the School Commissioner Election and *Bylaws* vote. *Each member shall have one vote, except that a group of affiliated schools – i.e., schools under common ownership – may have no more than five total votes regardless of the number of members in the group.*

If you have any questions regarding voting via electronic ballot to include password requests, please contact Holly Eichhorst, Manager of Commission Actions, at [heichhorst@accsc.org](mailto:heichhorst@accsc.org) or 703.247.4524.

### Revisions to the *Standards of Accreditation*

The Commission has approved revision to the ACCSC *Standards of Accreditation* in the following areas (from the May 11, 2018 and December 12, 2018 Calls for Comment):

- Substantive Standards – Leaves of Absence

Substantive Standards – Safety and Emergency Preparedness

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*Bylaws* revisions will be effective May 1, 2019. Effective dates for the revisions to the Standards of Accreditation are noted below. For additional information related to this *Accreditation Alert*, please contact Michale S. McComis, Ed.D., Executive Director, at 703.247.4520 or [mccomis@accsc.org](mailto:mccomis@accsc.org).

## **Proposed Bylaws Revisions**

The Accrediting Alliance of Career Schools and Colleges (dba ACCSC) proposes revisions to its Bylaws in the following areas:

### **Section 1.11 – Officers**

#### **Rationale:**

The Commission has determined that it should at the discretion of the Chair of the Commission as to when the Executive Committee election should occur at the Commission's last meeting of the year. The Commission strives for an open and transparent process and believes that in some instances the timing of the Executive Committee election may better correspond with the overall agenda of the meeting if held earlier during the meeting rather than at the conclusion. As such, the Commission would like the Chair to have discretionary control over the agenda and the timing of the election. The addition of "in-person" memorializes the Commission's long-standing practice of conducting the election at its May meeting, which is the last in-person meeting of the fiscal year (the Commission also has a June teleconference, but has never construed that as the last meeting of the fiscal year for the purposes of the Executive Committee election).

New Language indicated in *red, bold, italic print*. Deleted language indicated by ~~blue strikethrough~~.

### **Section 1.11 – Officers**

- b. The officers of the Commission shall be elected by the Commission at the ~~conclusion of the~~ last regular *in-person* Commission meeting of the fiscal year and shall serve for a term of one year commencing the first date of the ensuing fiscal year.

#### **Rationale:**

The Commission believes that the Alliance should allow sitting Commissioners who have completed one term of service to be eligible to serve a consecutive term. Currently, the Bylaws require that Commissioners who serve a term have to wait four years to be able to run again. Given the training and effort that goes into making ACCSC Commissioners exceptional, the Commission believes that it may be useful to capitalize on the experience gained after one term by allowing a Commissioner to parlay his/her expertise immediately through a consecutive term. A Commissioner seeking a consecutive term would still be required to go through the nomination and election process and the Nominating Committee could choose not to slate an individual for election to a second term who has not performed his/her duties in the first term.

### **Section 1.06 – Term**

Members of the Commission shall serve for a term of four (4) years except as provided by Section 1.08 (a-b). Upon completion of a Commissioner's term, the Commissioner shall ~~not~~ be eligible for election or appointment *for one consecutive to another* term. *Subsequently, the Commissioner shall not be eligible for election or appointment for another term* until four (4) years have elapsed. A Commissioner's term shall commence on the first day of the Corporation's fiscal year.

If you have any questions regarding either of the proposed *Bylaws* revisions, please contact Michale S. McComis, Ed.D., Executive Director, at [mccomis@accsc.org](mailto:mccomis@accsc.org) or 703.247.4520.

### **ACCSC School Commissioner Election**

Pursuant to *Section 1.04 (a)* and *Section 2.07 of the ACCSC Bylaws*, ACCSC will conduct an election beginning on **March 26, 2019** and ending on **April 9, 2019** to fill the following School Commissioner seat:

- 1 Elected School Commissioner for a four (4) year term to begin July 1, 2019

Upon the recommendation of the ACCSC Nominating Committee and consent by the full Commission the following individual has been slated as a candidate for the School Commissioner election.

- **Deborah Hepburn** – Triangle Tech

ACCSC encourages all of its accredited member institutions to take the time to review each candidate for School Commissioner prior to the election. To view the ACCSC election announcement and the candidate's nomination materials please [click here](#).

The ACCSC Nominating Committee made a diligent effort to slate a greater number of candidates than the open seat this year, however, despite two calls for nominations, individual outreach efforts, and due to several candidates withdrawing their nominations for various reasons, the Nominating Committee and the Commission were left with little choice but to move forward with the single candidate for election. As such, the Commission voted to waive the requirement of the Bylaws that calls for a greater number of candidates than vacancies (*Section 1.09 (b)(iii)*). The Commission did not take this action lightly but determined that given the circumstances this is the best course of action.<sup>1</sup>

#### **Electronic Ballot:**

On March 26, 2019, each ACCSC-accredited member institution will receive an e-mail from ACCSC with a website link and login instructions to cast its vote in the School Commissioner Election. The election of Commissioners is an important part of ACCSC's accreditation activities and the Commission encourages each accredited institution to cast its vote once the election opens. ***Each member shall have one vote, except that a group of affiliated schools – i.e., schools under common ownership – may have no more than five total votes regardless of the number of members in the group.***

If you have any questions regarding voting via electronic ballot to include password requests, please contact Holly Eichhorst, Manager of Commission Actions, at [heichhorst@accsc.org](mailto:heichhorst@accsc.org) or 703.247.4524.

### **Revisions to the Standards of Accreditation**

#### **May 11, 2018 Call for Comment – Leave of Absence**

##### **Background**

Originally, ACCSC modeled its standard regarding Leave of Absence (“LOA”) largely after the U.S. Department of Education’s (“the Department”) regulations. Over time, the Department’s expectations with regard to the granting of leaves of absence has changed and become less restrictive. ACCSC generally agrees with this move toward greater flexibility in the granting of leaves of absence while at the same time wanting to ensure that schools only grant such leaves when good reason exists to do so – in both instances the Commission believes that students benefit. Although the Commission revised its LOA standard in 2017, member institutions brought to the Commission’s attention that there may be another area where ACCSC may be unintentionally more restrictive than the Department.

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<sup>1</sup> The Commission also hopes that these circumstances will demonstrate to the membership the absolute need for individuals to participate in the peer review process and as such encourages individuals to seek out volunteer opportunities with ACCSC.

Specifically, ACCSC's LOA standard indicates that multiple leaves of absence within a 12-month period may be granted "in the event that unforeseen circumstances arise, such as medical reasons affecting the student or a member of student's immediate family, military service requirements, or jury duty." However, according to the 2017-2018 Federal Student Aid Handbook, the Department's current guidance is that "[i]nstitutions, at their discretion, may grant a student multiple leaves of absence as long as the total number of days for all leaves does not exceed 180 days within a 12-month period" (p. 5-14). As such, the Commission believes that there is room for greater alignment with the Department's regulation.

In reviewing this standard twice since 2017 and taking into account the responses to the May 11, 2018 Call for Comment, the Commission wishes to emphasize that its primary expectation remains: institutions should only place a student on a LOA when requested by the student and when good reason exists to do so. The inclusion of the word "acceptable" in *Section VII (A)(3)(c)(i)* means the reasons that the institution has determined to be appropriate for a leave of absence request which are also published in the concordant LOA policy. Institutions may not place students on a LOA when the student has not requested such leave and/or for reasons the school determines to be unacceptable.

The Commission has promulgated the following revisions to the *Standards of Accreditation* effective July 1, 2019.

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

## SECTION VII – STUDENT LEARNING, ASSESSMENT, PROGRESS, AND ACHIEVEMENT

### A. Student Learning, Assessment, and Satisfactory Progress

#### 3. Student Satisfactory Progress

##### c. Leave of Absence

- i. If the school allows students to take a leave of absence, the school defines and publishes in its catalog the leave of absence policy to include the process to have a leave of absence approved, the **acceptable** reason(s) why a student can request a leave of absence, the allowable leave of absence period, and the consequences of a student's failure to return from an approved leave of absence. The period of the leave of absence may not begin until the student has submitted and the school has approved a written and signed request for an approved leave of absence except in those cases where unforeseen circumstances would prevent a student from submitting a request in advance.<sup>2</sup>
- ii. A leave of absence period may not exceed 180 days within any 12-month period. A school may grant more than one leave of absence ~~in the event that unforeseen circumstances arise, such as medical reasons affecting the student or a member of student's immediate family, military service requirements, or jury duty,~~ provided that the combined leaves of absence do not exceed 180 days within the 12-month period **and that each leave of absence is properly requested by the student in accordance with the school's policy and standards set forth here.**

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<sup>2</sup> In cases where a school grants a leave of absence to a student who could not provide a request prior to the leave of absence period due to unforeseen circumstances, the school must secure at a later date the request and the reason(s) for the leave of absence along with documentation to show that the leave of absence could not have been requested and approved in advance. In these cases, the beginning date of the leave of absence period can be no earlier than the date that the circumstances prevented the student from attending school.

## **December 13, 2018 Call for Comment**

### **Safety and Emergency Preparedness Standards**

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 (e.g., state and federal) whose requirements have evolved 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*.

At the February 2019 meeting the Commission reviewed the responses to the December 12, 2018 Call for Comment. Based upon a review of the background of this issue and the responses to the Call for Comment, the Commission has promulgated the following revisions to the *Standards of Accreditation*. New text in **Red, Bold, and Italic** deleted text in ~~Blue Strikethrough~~.

The effective date for implementation is **July 1, 2020** for currently accredited schools and is effective immediately for schools accepted into the initial accreditation process.

## **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~~**

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

- ~~31~~ 1. 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, faculty, 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-addressed to scale could 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.*