

Choosing an Independent Third-Party Employment Data Verification Auditor

As a pathway for schools to begin the employment data verification process, ACCSC has identified an independent third-party employment data verification auditor that the Commission has worked with in the past, and therefore, has met the Commission's definition of "independent." If a school chooses to engage with this independent third-party employment data verification auditor, the Commission will consider the nature of the work acceptable for this project.

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If a school chooses to use a different independent third-party employment verification auditor, which is an option, that auditor must meet the following tests to be considered an "Independent Third-Party." Please note that the auditor will not go through any type of approval process with ACCSC prior to the project; rather, the on-site evaluation team will review the independence and methodology of the auditor. The vendor will be required to attest to the following to verify its independence and third-party nature:

1. The auditor must not be an employee of or affiliated with the school or share any part ownership in the school or its affiliated schools.
2. The auditor cannot provide other services to the school with the exception of a Certified Public Accountant that serves as the school's independent third-party auditor for financial statements and Title IV compliance audits.
3. The third-party auditor must verify the employment data in a manner independent from the school. This means that the independent third party will conduct the verifications without assistance from the school, with the exception of the school's provision of records to be verified.
4. The third-party auditor must select a minimum of a 50% sample of employed graduates from each Graduation and Employment (G&E) Chart and report the results from that sample.

5. The independent third-party auditor must secure or attempt to secure verification from the employer or the graduate either verbally or in writing for all cases in which a school classified a graduate as “Graduates-Employed in Field,” line 15 on the G&E. This is not just an “audit” of the school’s back-up documentation.
6. The independent third-party auditor’s report must be able to provide a summary of results and a description of the methodology used for the selection of the sample and the verification process in alignment with *Appendix VIII, Guidelines for Employment Classification, Substantive Standards, Standards of Accreditation*.
7. The independent third-party auditor must include a signed certification attesting to the accuracy of the auditor’s findings and the auditor’s independence. The Commission is working earnestly to revise the Initial/Renewal of Accreditation Applications and Self-Evaluation Report to include this new requirement and the new forms will be posted to the website in advance of January 1, 2014.

If you have any questions pertaining to this new requirement, please contact Michale S. McComis, ACCSC Executive Director at 703.247.4520.