The Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") has made revisions and additions to the Standards of Accreditation effective as of April 15, 2012 in the following areas:

- **Section II** (A)(2&(9) & (B), Substantive Standards, Standards of Accreditation – Definition of a Credit Hour
- **Section I & IV, Rules of Process and Procedure, and Section II, Substantive Standards, Standards of Accreditation – Continuing Education / Avocational Courses and Secondary Educational Objectives
- Revision to **Section IV, Rules of Process and Procedure, Standards of Accreditation – Change of Ownership**
- **Section V** (A)(6&7), Substantive Standards, Standards of Accreditation Admissions Policies and Practices
- **Section VI, Substantive Standards, Standards of Accreditation – Student Services**
- **Appendix VIII – Guidelines for Employment Classification, Substantive Standards, Standards of Accreditation**
- Conforming amendments and clarification revisions to the Rules of Process and Procedures.

**Informational Webinar – April 30, 2012**

The Commission understands the importance of providing guidance on these important changes and will hold an informational Webinar to discuss the key areas of change established by this Accreditation Alert. The Webinar will be held on April 30th 2012 at 2:00 p.m. Please register for this Webinar at the following:  [https://www2.gotomeeting.com/register/464190930](https://www2.gotomeeting.com/register/464190930)

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.
New Commissioners Announcement

The Commission is pleased to announce that the ACCSC membership has elected the following individuals to serve a four-year term as a School Commissioner commencing July 1, 2012 and ending June 30, 2016:

Sherry Bomberger  
Sr. Vice President, Education and Regulatory Affairs  
YTI Career Institute

William Buchanan  
Executive Vice President, Marketing and Admissions  
Corinthian Colleges, Inc.

The Commission is also pleased to announce that the following individual has been appointed by the ACCSC Board of Directors to serve a four-year term as a School Commissioner commencing July 1, 2012 and ending June 30, 2016:

James A. Bologa  
Chief Operating Officer  
Porter and Chester Institute

Revisions to Section II, Substantive Standards, Standards of Accreditation

Definition of a Credit Hour

In the October 29, 2010 Federal Register, the U.S. Department of Education (“the Department”) issued new regulations pertaining to, among other things, the definition of a credit hour. For Federal Financial Aid (Title IV) eligibility purposes, the Department has established credit hour definitions based on three classifications of educational programs:

1. For degree programs and selected non-degree programs, a credit hour, as defined in 34 C.F.R. §600.2, is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than (1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or (2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

2. If a program is deemed eligible for clock-to-credit hour conversion according to 668.8(k)(2) - Non-degree programs of at least one academic year in length, a credit hour is defined as follows:

   a. One semester credit hour must include at least 30 clock hours of instruction and for each 30 clock hours of instruction, the maximum amount of outside work permitted is 7.5 hours.

   b. One quarter credit hour must include at least 20 clock hours of instruction and for each 20 clock hours of instruction, the maximum amount of outside work permitted is 5 hours.
3. If a program is not deemed eligible for clock-to-credit hour conversion according to 668.8(k)(2), regardless of state or accrediting agency recognition of academic credit hours, these programs are required to measure student progress for Federal Financial Aid purposes in clock hours only.

Based on the additional requirements for institutional accreditors described in 34 C.F.R. §602.24, the accrediting agency, as part of its review of an institution for initial accreditation or preaccreditation or renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution’s assignment of credit hours.

Given the unique nature of vocational education, the Commission has found that the credit hour definition as defined in §600.2 paragraph (1) as one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work may not accurately reflect the reality of the learning environments for ACCSC member schools. As a general rule in vocational and career-oriented education, a combination of didactic learning, hands-on practice and experimentation, and out-of-class work/preparation represent the best learning environment and opportunity for students to acquire the necessary skills and competencies. The combination and measure of these different learning modalities, however, is highly variable and depends greatly on the type of program taught and the educational objectives. Given the variety of learning environments and experiences in vocational and career-oriented education typically found in ACCSC-accredited institutions, the Commission has developed a definition of a credit hour that a) reasonably approximates the federal definition and b) provides flexibility in program design and delivery as a means to afford students the best opportunity to achieve programmatic learning objectives.

The Commission acknowledges that its new definition represents a slight paradigm shift in the way in which schools traditionally have measured and classified “time” in the program. The Commission’s proposal moves away from establishing “where” the learning takes places – i.e., in a classroom, in a laboratory – and moves toward establishing “how” the educational process takes place – i.e., didactic, supervised, or self-directed. The Commission’s proposal “weights” the value of each type of educational process giving greater weight/value to learning environments where students have the most didactic engagement with faculty (e.g., direct instruction) and giving lesser weight/value to self-directed activities (e.g., out-of-class work/preparation) as follows:

One semester credit hour equals 45 units (and one quarter credit hour equals 30 units) comprised of the following academic activities:

- One clock hour in a didactic learning environment = 2 units
- One clock hour in a supervised laboratory setting of instruction = 1.5 units
- One hour of externship = 1 unit
- One hour of out-of-class work and/or preparation1 for the didactic learning environment or supervised laboratory setting of instruction that are designed to measure the student’s achieved competency relative to the required subject matter objectives = 0.5 unit

Consider the following example. In Automotive Brake Systems 101, a student may spend one hour in a classroom listening to a lecture, which would be defined as a didactic learning environment. The class may then move into the Auto Lab where the instructor spends another hour showing the students the

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1 Out-of-class work/preparation would be based on justifiable estimates derived from the program design and development process. Institutions would not be required to track individual student time for the purpose of awarding credit for out-of-class work/preparation.
different components of a brake system, which would also be defined as a didactic learning environment regardless of the fact that the instruction took place in a laboratory setting. The class may then spend another hour engaged in hands-on practice assembling brake components while the instructor oversees their work, which would be defined as a supervised laboratory learning environment. Lastly, the student may go home and be required to read a chapter and answer end-of-chapter questions for the next day’s lesson, which would be defined as out-of-class work/preparation.

The Commission believes that the new definition is in far greater alignment with vocational and career-oriented education courses than more traditional credit-hour measures that align more closely with liberal arts courses. Thus, the Commission has attempted to create a system that gives the most appropriate array of course design options in alignment with the diverse types of vocational and career-oriented programs offered by ACCSC-accredited institutions. The Commission’s new language regarding credit hour awards and the definition of a credit can be found in the revised Standards of Accreditation dated April 15, 2012 under Section II (A)(2)(d)(ii) and Appendix III, Substantive Standards, Standards of Accreditation.

**Process:**

The Commission’s new definition of a credit hour is effective immediately, applies to all programs degree and non-degree, and schools must begin assessing and awarding academic credit in alignment with this definition and complete any necessary program changes no later than December 31, 2012. The Commission intends to assess program credit awards during the regular renewal of accreditation process for all schools. In the event that the new definition of a credit hour causes the total number of credits awarded in a program to change, schools may submit notice to the Commission of the change using the ACCSC Notice of Revised Academic Credit Hours without a fee.

In order to assist schools in the calculations for the new credit hour definition, the Commission has also created new conversion profiles also available on the ACCSC website:

- Non-Degree Program: Non-Degree Program Profile of Clock Hour to Credit Hour Conversion
- Degree Program: Outline of a Degree Program

Schools are encouraged to utilize the above conversion profiles for assistance in determining if adjustments are necessary to demonstrate compliance with the new definition. The following is an explanation of the process to be followed once each program’s credits have been calculated using the new definition of a credit hour.

- **If the credit hours remain the same:** No action on the school’s part is required and the Commission will assess the school’s compliance with the new definition and the award of credit hours at the time of the school’s next initial or renewal of accreditation process.

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Currently Approved Hours</th>
<th>Hours Based on New Definition</th>
<th>Award</th>
<th>Submission Required</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Semester Credit Hours</td>
<td>Instructional Clock Hours</td>
<td>Semester Credit Hours</td>
<td>Instructional Clock Hours</td>
</tr>
<tr>
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<td>50</td>
<td>900</td>
<td>50</td>
<td>900</td>
</tr>
<tr>
<td>Medical Assisting</td>
<td>65</td>
<td>1200</td>
<td>65</td>
<td>1200</td>
</tr>
<tr>
<td>Healthcare Administration</td>
<td>130</td>
<td>2400</td>
<td>130</td>
<td>2400</td>
</tr>
</tbody>
</table>

2 For Title IV federal financial aid purposes, schools may be required to be in compliance with the federal requirements regarding the definition of a credit hour prior to December 31, 2012. Schools should contact their U.S. Department of Education case management team in order to determine the federal requirements in this regard.
If the credit hours change:

- **Option 1:** A school may elect to adopt the new credit hours as calculated (no variation in actual instructional clock hours of the program). If so, the school must submit the ACCSC Notice of Revised Academic Credit Hours. ACCSC will update the Commission’s database; however, the school must determine if the state requires any notification or approval. The Commission will assess the school’s compliance with the new definition and the award of credit hours at the time of the school’s next initial or renewal of accreditation process.

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Currently Approved Hours</th>
<th>Hours Based on New Definition</th>
<th>Award</th>
<th>Application to be Submitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical Assisting</td>
<td>50 900</td>
<td>45 900</td>
<td>Diploma</td>
<td>ACCSC Notice of Revised Academic Credit Hours including the Non-Degree Program Profile of Clock to Credit Conversion</td>
</tr>
<tr>
<td>Medical Assisting</td>
<td>65 1200</td>
<td>60* 1200</td>
<td>AOS</td>
<td>ACCSC Notice of Revised Academic Credit Hours including the Outline of Degree Program</td>
</tr>
<tr>
<td>Healthcare Administration</td>
<td>130 2400</td>
<td>120* 2400</td>
<td>BS</td>
<td>ACCSC Notice of Revised Academic Credit Hours including the Outline of Degree Program</td>
</tr>
</tbody>
</table>

The school must ensure the new Credit Hours continue to meet ACCSC Degree Standards.

- **Option 2:** A school may elect to modify the current instructional clock hours, thus changing the recognized instructional clock hours. If this is the case, the school must submit a non-substantive program modification or substantive program modification, as appropriate. The Commission will assess the school’s compliance with the new definition and the award of credit hours at the time of the school’s next initial or renewal of accreditation process.

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Currently Approved Hours</th>
<th>Hours Based on New Definition</th>
<th>Modified Hours</th>
<th>Award</th>
<th>Application to be Submitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical Assisting</td>
<td>50 900</td>
<td>40 900</td>
<td>45 1000</td>
<td>Diploma</td>
<td>Non-Substantive Modification</td>
</tr>
<tr>
<td>Medical Assisting</td>
<td>50 900</td>
<td>40 900</td>
<td>50 1150</td>
<td>Diploma</td>
<td>Substantive Modification</td>
</tr>
<tr>
<td>Medical Assisting</td>
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<td>55 1200</td>
<td>60 1400</td>
<td>AOS</td>
<td>Non-Substantive Modification</td>
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<tr>
<td>Medical Assisting</td>
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</tr>
<tr>
<td>Healthcare Administration</td>
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<td>115 2400</td>
<td>120 2700</td>
<td>BS</td>
<td>Non-Substantive Modification</td>
</tr>
<tr>
<td>Healthcare Administration</td>
<td>130 2400</td>
<td>115 2400</td>
<td>130 3000</td>
<td>BS</td>
<td>Substantive Modification</td>
</tr>
</tbody>
</table>

As stated above, ACCSC will seek to review and verify credit hour awards through the initial and renewal of accreditation process. The Commission will modify the ACCSC Self-Evaluation Report to ask for sample course materials from each of the school’s programs for which credits are awarded and the on-site evaluation teams will review and verify the materials submitted. Schools will be asked to provide credit award rationales, syllabi, and sample student work and school evaluations as part of that process.
Revisions to Section I & IV, Rules of Process and Procedure, and Section II, Substantive Standards, Standards of Accreditation

Continuing Education / Avocational Courses and Secondary Educational Objectives

The Commission has established a process for continuing education and avocational course approval within an ACCSC-accredited school’s scope of institutional accreditation. ACCSC will continue to allow institutions to offer continuing education and avocational courses as a secondary educational objective outside of ACCSC’s scope of accreditation and will now also allow institutions to apply for these types of courses to be included in the school’s scope of institutional accreditation. For the Commission’s purpose, continuing education courses or avocational courses are those that do not have as an educational objective specific vocational and career-oriented employment. An example of an avocational course is a two-day course on baking specialized pastry offered by a culinary school.

The Commission expects that schools will treat students enrolling in these courses in a fair manner consistent with the requirements, spirit, and intent of ACCSC accreditation requirements. Key components of the Commission’s revisions include the following:

- Continuing education and avocational courses must be defined as secondary educational objectives; however, a school may not define a program with vocational objectives as avocational.

- In order for a continuing education course or avocational course to be included in a school’s scope of institutional accreditation, that course must be less than 300 clock hours and related to an ACCSC-approved vocational career-oriented program for that school (with the exception of GED preparation courses). To reiterate, this is a voluntary decision on part of the institution.

- A school must deliver continuing education and avocational courses to students as advertised and must meet disclosure requirements.

- A school must have refund and complaint policies.

- A school would not be required to track or report student achievement outcomes for continuing education or avocational courses.

Also, due to the difficulty that schools have had in demonstrating compliance with ACCSC’s “stand-alone” English as a Second Language (“ESL”) program requirements, the Commission has excluded stand-alone ESL programs from the Commission’s scope. Therefore, the approval of any stand-alone ESL program currently will cease once all students enrolled as of April 15, 2012 have completed their training. Any student enrolled into a stand-alone ESL program after April 15, 2012 will not do so under the auspices of ACCSC accreditation. Schools still have the opportunity to offer front-loaded or integrated ESL courses.

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3 The Commission’s stand-alone ESL standards will remain in effect until all currently enrolled as of April 15, 2012 have completed their training.
**Revision to Section IV, Rules of Process and Procedures, Standards of Accreditation**

**Change of Ownership**

The Commission has revised ACCSC’s allowance for excluded change of ownership transactions that occur within an immediate family. The Commission believes that it is appropriate to assess the new owner’s experience and capacity to operate an accredited post-secondary educational institution, regardless of familial relationships. The intent of the revision is not to remove the excluded transaction provision, but to provide the Commission with the information necessary to assess the capacity of the new owner to operate the school in accordance with accrediting standards in an on-going manner and to require remedial action as deemed necessary. Thus, such transactions will not require the submission of an application for approval of a change of ownership, but will henceforth require the submission of a Change of Ownership Report.

**Revisions to Section V (A)(6&7), Substantive Standards, Standards of Accreditation**

**Admissions Policies and Practices**

The Commission has revised a section of its admissions standards that has caused some confusion for schools in order to make more clear the Commission’s expectations and intent and to better align with other applicable requirements meant to prevent discriminatory practices. Specifically, currently one standard states that a school may not enroll a student that has a disability that would prevent the use of the knowledge and skill gained from the training while another standard states that a school may not deny admission on the basis of a disability. The main point of the standards, the Commission has determined, is that a school should neither deny admission nor discriminate against students on the basis of several protected classes and has revised the standards as such.

**Revision to Appendix VIII – Guidelines for Employment Classification, Substantive Standards, Standards of Accreditation**

The Commission has reviewed its Guidelines for Employment Classification pertaining to self-employment classifications and has made the following revision:

b. Self-Employment:

   ii. The school secures some form of **written-verifiable** documentation to demonstrate that the self-employment is valid. such as a state license or certificate authorizing such employment

The Commission has made this revision to the Guidelines in order to clarify that while a state license or certificate authorizing such employment would qualify as a form of verifiable documentation to demonstrate that the self-employment is valid, they are not the only forms of documentation that the Commission would find acceptable. The Commission found that the “such as” list caused some confusion for schools who interpreted the list to be finite list instead of representative as the Commission had intended. Schools may use a broad range of supporting documentation so long as the documentation is in fact **verifiable and valid.** For example, a state license to work as a self-employed massage therapist in conformance with state requirements would meet the expectations of the guidelines; however, a business card alone would not normally demonstrate valid self-employment.
Reformat of Section VI, Substantive Standards, Standards of Accreditation

Student Services

The Commission has reformatted Section VI, Student Services, Standards of Accreditation moving its expressed intent language from the Statement of Purpose to the codified language of that section. The intent is clarify the Commission’s expectations and the reformat does not represent a substantive change of the Commission’s requirements in this area.

Revisions to the Rules of Process and Procedures

The Commission has revised the Rules of Process and Procedures in areas that required conforming amendments or that required clarification. These include:

- Section I (D)(2)(c), Rules of Process and Procedures, Standards of Accreditation
- Section II (A), Rules of Process and Procedures, Standards of Accreditation
- Section VI (A)(4)(b)(iii), Rules of Process and Procedures, Standards of Accreditation
- Section VII (D)(5)(a-c), Rules of Process and Procedures, Standards of Accreditation
- Section VIII (E)(3), Rules of Process and Procedures, Standards of Accreditation