

Preparing an Effective Response for Commission Consideration

Christopher Lambert
Director of External Affairs
ACCSC

Preparing an Effective Response

- As part of the accreditation process, there are a series of documents and reports that are critical to the Commission as they seek to determine an institution's compliance with accrediting standards
 - For institutions seeking accreditation: the Application for Renewal of Accreditation and Self-Evaluation Report
 - For institutions not in a renewal cycle: applications for new programs, degree programs, changes of location and changes of ownership.
- Significant activities, such as seeking renewal accreditation, changing location, changes in ownership, and going degree granting, for example, necessitate an on-site evaluation with representatives from ACCSC.
 - Following an onsite evaluation, ACCSC generates a Team Summary Report which necessitates a response from the institution.

Purpose of the On-site Evaluation

- ❑ Review and analyze school data:
 - ❑ Application for Renewal of Accreditation, SER, reports, responses
- ❑ Seek additional information
- ❑ Understand school's objectives and mission
- ❑ Verify school's compliance w/ *Standards of Accreditation* in light of those objectives and mission

Many schools have a goal of having no findings at an on-site evaluation. Keep in mind the onsite evaluation team does not make the final decision regarding an institution's compliance with accrediting standards.

A better goal is to have no findings at the Commission level. The Commission is the final decision making body, which underscores the importance of a comprehensive, well-documented response that clearly demonstrates the school position.



Preparing Your Response

Preparing an Effective Response

- **Plan ahead for your response**
 - Engage in the accreditation process
 - Attention to the exit interview will be helpful.
 - Take copious notes
 - When dealing with response to school action letter, each letter identifies a primary point of contact at the staff level.
- **Make certain that you clearly understand the expressed concerns and additional information requested.**
 - If you do not understand something, ask the Commission staff representative for an explanation

Preparing an Effective Response



- Review identified references to the *Standards of Accreditation*.
- Make certain you understand what the Standard means, and refer to the pertinent elements of the cited Standard in your response.
- If you do not understand the requirement, contact your Commission representative, or any member of the ACCSC Leadership Team.

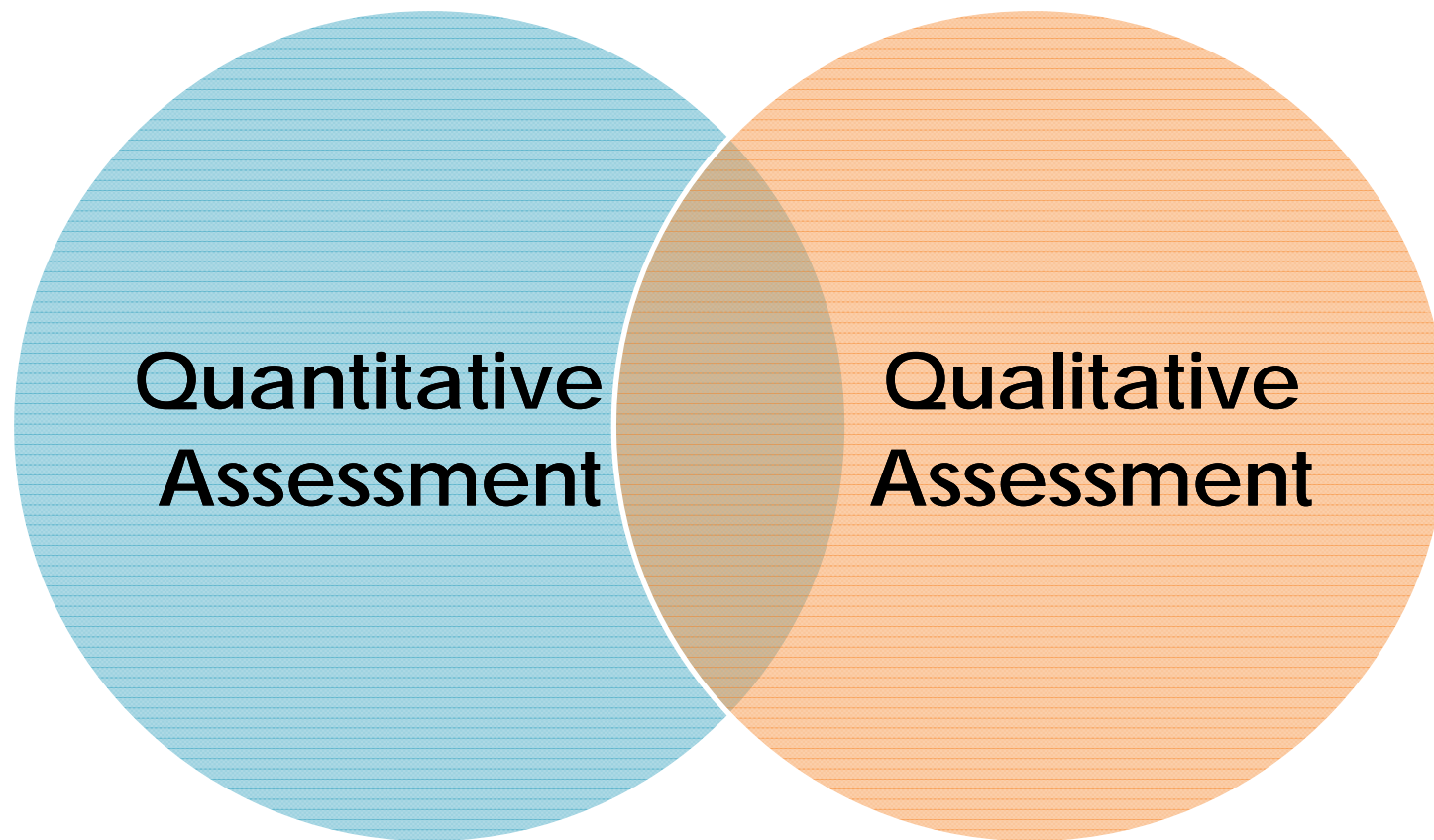
Preparing an Effective Response



- If something was missed by the team, make it very clear in your response what the school was doing before the on-site evaluation.
- If you disagree with a concern, do not provide a cavalier response.
 - Do not focus your energy and efforts on attacking the team
 - Give a serious, thorough description of what you are doing.
 - Provide supporting documentation to support your position.

Using Data to Tell Your Story

Accountability and Assessment



Preparing an Effective Response

Quantitative Analysis:

Sample narrative:

See Exhibit A for a copy of the Graduation and Employment Chart for the Culinary Arts program which shows a 78% graduation rate and a 66% graduate employment rate.

Although the reported 66% graduate employment rate falls below the required benchmark (70%), it represents a 15% increase in the graduate employment rate over the past 6 months.

What else can you tell the Commission?

Move beyond the raw numbers.

Preparing an Effective Response

Qualitative:

What factors contributed to the graduate employment rate?

- economic conditions,
- state and national trends,
- location,
- student population served,
- length of program,
- students who withdraw from training but still obtain employment,
- state requirements, or
- other external or mitigating factors reasonably related to student achievement that are adversely impacting the school's ability to meet the Commission's established benchmark rates.

Past, Present, Future: A Strategic Response

Preparing an Effective Response

Focus on three distinct areas in your response:

Past – Explain the circumstances that impacted the school’s ability to demonstrate compliance.

Present – Demonstrate to the Commission that you have taken corrective action, and include documentation available to support your position

Future – Identify your plan to ensure that this area of non-compliance will not be a repeat finding.

Practical Example

Team Finding of Non-Compliance

The team is concerned that the school did not have two (2) Program Advisory Committee meetings in 2009 as required by *Section II (A)(4), Substantive Standards, Standards of Accreditation*.

Specifically, based on a review of the minutes from the school's PAC meetings in 2009, and as confirmed via conversations with the school's staff, the school only hosted one meeting for the Culinary PAC in 2009.

Past –

The school is aware of the requirements regarding Program Advisory Committees as outlined in *Section II (A)(4), Substantive Standards, Standards of Accreditation*.

The school agrees with the team's finding in this regard, and noted that there were a number of scheduling complications that prevented the school from having two meetings for the Culinary PAC in 2009.

Additionally, upon further examination, school officials noted that there was no internal policy regarding the requirements for PAC meetings, which lead to some confusion among staff and resulted in a shortfall in the required number of meetings for the Culinary program.

Practical Example

Present –

Since the on-site evaluation, the school has established a new internal policy regarding Program Advisory Committees ([See Exhibit A for a copy of this policy](#)) and has created a new administrative position that is responsible for the coordination of all PAC meetings on a go-forward basis ([See Exhibit B for a position description](#)).

On January 2, 2010, the school hired John Imontopofit to serve in this capacity. ([See Exhibit C for a copy of the resume \(SPR\) for John Imontopofit](#)).

The school also hosted a Program Advisory Committee for the Culinary program on January 5, 2010.

Attached are copies of the minutes from that meeting which include the PAC's review and comments on all areas outlined in *Section II (A)(4), Substantive Standards, Standards of Accreditation* ([See Exhibit D](#)).

Practical Example

Future –

As referenced in our response, we have implemented new policy regarding PACs.

Accordingly, we have scheduled the next two meetings for the Culinary PAC to ensure that the school maintains compliance with accrediting standards on a go forward basis. Although the standards only require two meetings per year, given the valuable role our PAC plays, we have determined that having three meetings per year to be an ongoing goal .

See Exhibit E for a tentative agendas for the next Culinary PAC meeting that is scheduled for April 10, 2010, and December 1, 2010, respectively.

Commission Consideration



Is the documentation clear and concise?

Do the minutes reflect that all areas required under *Section II (A)(4), Substantive Standards, Standards of Accreditation*, have been addressed?

Were the appropriate number of PAC members in attendance?

Was there a pattern of non-compliance throughout the school's most recent term of accreditation? Or was this an isolated incident?

If yes, then PAC Reporting might be appropriate in order to afford the institution an opportunity to demonstrate its continual compliance with accrediting standards on a go forward basis.

My Best Advice...

Responding to the Team Summary Report

As a team finding of non-compliance is based on an area required by the *Standards of Accreditation*, do not promise compliance on a go forward basis without providing sufficient documentation to demonstrate how the school is currently in compliance.

The promise of future compliance does not provide the Commission with an opportunity to verify that the school has addressed/corrected the findings noted by the on-site evaluation team and does not demonstrate that an institution is currently operating within the requirements outlined in the *Standards of Accreditation*.

Advice: Do not answer with a “will do” response; answer with a “have done” response.

My best advice...

Engage in the Accreditation Process

Once every five years the Commission has the opportunity to evaluate and assess our accredited member institutions. Engage in the accreditation process from the beginning and you will have a better understanding of the Commission's objectives.

Organize Your Thoughts

Ensure that your response is clear, concise and includes relevant documentation to support your position.

Explain how the documentation provided supports your position.

Use Your Team

It is often said that it takes more than one person's efforts to ensure an effective accreditation evaluation. Have a separate set of eyes to review, edit and comment on, and to give balance to, your response before you send it to the Commission.

Answer the question

Ensure that your response addresses the item of non-compliance, and does not simply talk around the issues.

My best advice...

Organize Your Response

If you have not previously prepared an electronic submission, review the ACCSC Webinar on Electronic Submissions, available at www.accsc.org under the [Events](#) Section.

Include a narrative introduction

Help the Commission understand the position you are taking, and explain how the documentation supports your position.

Review the *Standards of Accreditation*

Ensure you have a robust understanding of the Commission's expectations.

Contact the Commission office with any questions you may have

Use All Available Resources

If applicable, review the Commission's monograph series brochures which focus on topics such as IAIP, FIP, LRS, and PACs

Avoid the illusion of compliance

Ensure that your response is realistic, and accurately reflects current school policies and procedures. Do not hire a consultant to put together a comprehensive response if it does not reflect day to day practices at the institution.

Responding to the Team Summary Report



Ensure that your electronic response is organized (bookmarked) and specifically addresses the items of non-compliance.

- Review the *ACCSC Instructions for Electronic Submission*

Do not overwhelm the Commission by including miscellaneous documents that do not address the concern or support your position.

- Remember that the quality of the response is more important than the number of pages provided.

In all cases provide appropriate and supporting documentation.

- Explain how the documentation supports your response.

Documentation



- If the institution has implemented a new process, or created a new form, as part of its efforts to ensure compliance with accrediting standards, the response must show the implementation of the process or form.
 - Explain the intended goal of the new process / strategy
- Keep in mind that the submission of a blank form does not demonstrate to the Commission that this new form, intended to document compliance, has been implemented.
- Additionally, a narrative reference to a new process or procedure, without supporting documentation, does not show that this process is in place, and is effective.

My best advice...

Documentation, Documentation, Documentation

- As previously stated, describe how the documentation supports your position.
- Don't simply include superfluous documentation without explaining what the documentation shows.
- Is the documentation clear?
- Is the documentation complete? (no blank forms)
- Does the documentation demonstrate that a corrective action has taken place?
- Does the documentation show the systematic implementation of a new process or policy?
- Keep in mind that the Commissioners were not on the visit, and will be relying upon documentation to determine that the school taken the necessary corrective action to come into compliance.



Timelines to Respond

Timelines for the response

The onsite evaluation team will formally review their findings with the institution during an exit interview.

A copy of the Team Summary Report (TSR) will be issued to the institution within 60 days of the onsite evaluation.

The institution will be afforded 45 days to prepare and submit their response for Commission consideration.

If the institution is responding to a Commission school action letter, the timelines for submission will be defined in the letter.



Commission Actions

Accreditation (5 Years)

Eligible for ACCSC School of Distinction / School of Excellence Award

- No stipulations
- Sustaining Fees
- Annual Report
- Rates of Student Achievement

Accreditation with Stipulations/Reporting

An institution receives accreditation for a period of 1-5 years, and must demonstrate compliance with accrediting standards.

If the school has a “stipulation,” then the school must provide documentation demonstrating the corrective action taken to bring the school into compliance with accrediting standards before accreditation is conferred.

If the school is on “reporting” then an interim report must be provided by the school as prescribed

Typically 6 months to 12 months in the future
Examples: Outcomes, Refund, Financial, PAC

Deferral

A deferral action is not an adverse action but requires an institution to provide additional information in order to demonstrate their compliance with accrediting standards before accreditation can be conferred.

Upon receipt of additional information the Commission may act to confer accreditation, defer action again, place the school on show cause or probation, or take a more punitive action such as revoking the school's accreditation.

Probation

The Commission opts to place a school on Probation when it has determined that the school is not in compliance with an accreditation standard and gives the school a specified period of time to bring itself into compliance.

In accordance with 34 CFR Section 602.26 (b)(1), ACCSCT provides written notice, via its web page, to the public of a decision to place an institution on Probation. Additionally, the Commission is required to notify the Department of Education of this action, and the institution is required to notify students that the school is currently on Probation

Show Cause

The Commission opts to direct a school to show cause as to why its accreditation should not be revoked when there are serious questions about a school's compliance with accreditation standards. The school is given a specific period of time to demonstrate its compliance with accrediting standards. A school may not implement any substantive changes while under a show cause order.

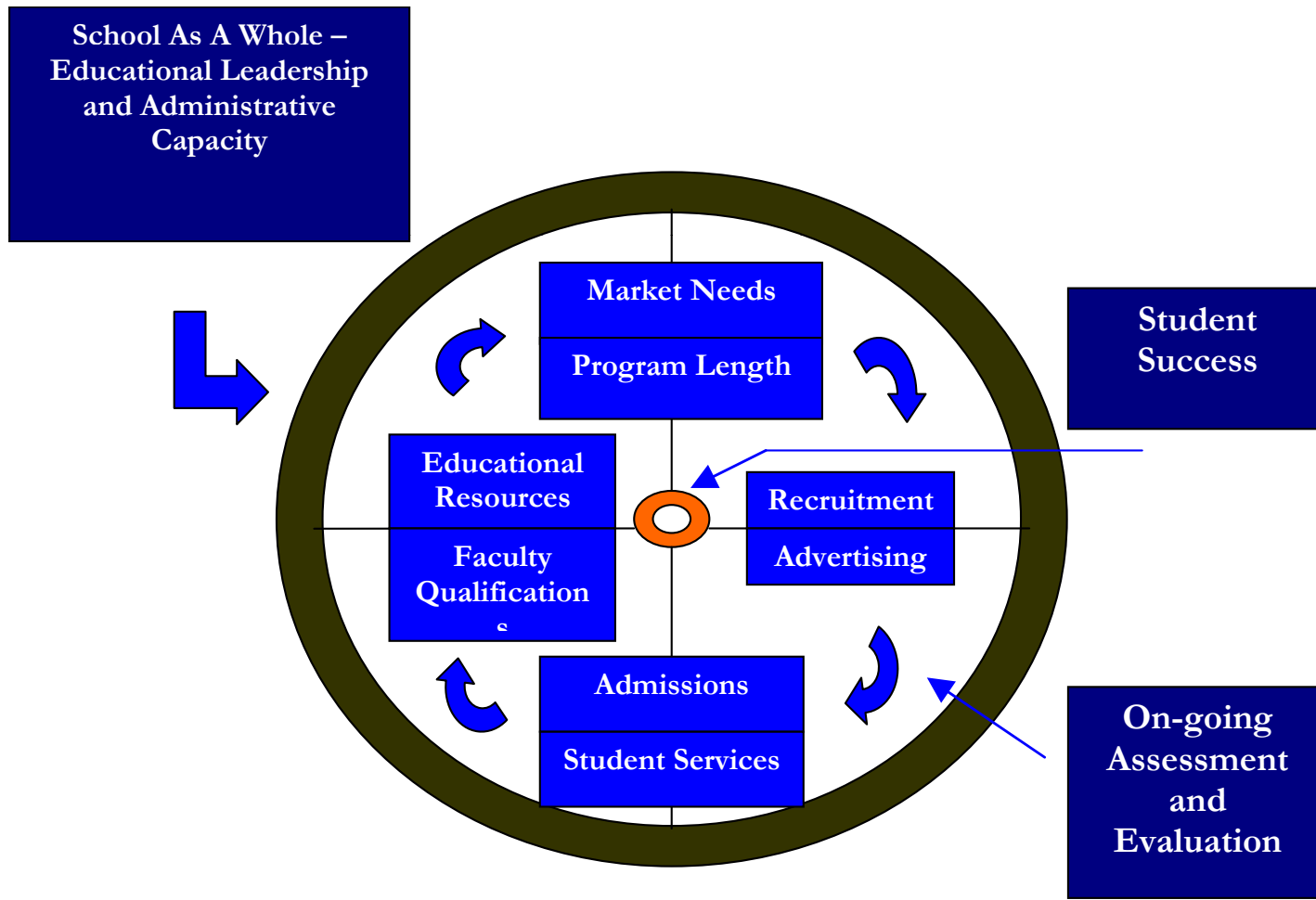
Fail to Grant Accreditation

The Commission will revoke a school's accreditation, and remove the school from the list of ACCSC accredited institutions when a determination has been made that the school is operating outside of the requirements of the *Standards of Accreditation*. Schools may reapply nine (9) months after the final decision of the Commission or Appeals Panel.

Removal (From Accredited List)

School's accreditation is revoked during a process other than renewal.

Actions are subject to Appeal.



Questions and Answers

Preparing an Effective Response for Commission Consideration

Christopher Lambert
Director of External Affairs
ACCSC