To:	ACCSC-Accredited Institutions and Other Interested Parties
From:	Michale S. McComis, Ed.D., Executive Director
Date:	March 7, 2022
Subject:	Call for Comment: Revisions to the *Standards of Accreditation*

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

➢ **Program Evaluation –** *Section III (A)(4&6); Appendix II; Substantive Standards, Standards of Accreditation*

➢ **Tuition, Cancellation, and Refund Policies –** *Section I (C)(3), Substantive Standards, Standards of Accreditation*

➢ **Licensure Rate Disclosure –** *Section IV (C)(3), Substantive Standards, Standards of Accreditation*

The Accrediting Commission of Career Schools and Colleges (ACCSC) welcomes and encourages the comments of its 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. Written comments are due by **April 7, 2022**.

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.

Program Evaluation
Section II (A)(4&6); Appendix III; Substantive Standards, Standards of Accreditation

The Commission has been discussing ways to re-conceptualize program evaluation standards in a manner that gives institutions greater flexibility while also promoting student and alumni participation in assessing in an intentional manner the effectiveness of programs. This proposal is part of ACCSC's **Students First** initiative that seeks, among other things, to place students in a more prominent role in the accreditation assessment paradigm.

These draft revisions are an attempt to re-conceptualize the Commission's standards in these regards. At first blush, it may appear that the draft revisions are legion. That, however, is not really the case from a substantive point of view. Much of the language has been moved around or realigned to streamline the information. The Commission, however, points to the following key components as the prominent elements of the draft revisions:

- Conceptually, the draft revisions consolidate program evaluation into one section of the *Substantive Standards*.

- Technically, the section for Program Advisory Committees has been consolidated with the section on Program Evaluation and detailed requirements for the use of Program Advisory Committees have been moved to *Appendix III*.

- Student, Alumni, and other useful external sources, have been specifically added to the resources expected to be part of a school's program evaluation process.

- By making the program evaluation process inclusive of a wider array of external resources, the number of required Program Advisory Committee meetings has been reduced to a minimum of one annually.

- The requirement for one on-site Program Advisory Committee meeting per year has been replaced with an option for a virtual meeting.

As is the case in all areas of this Call for Comment, the Commission is very interested in receiving feedback from the membership with regard to these draft revised standards, the concepts described here, and the specific language proposed.

The draft revisions are color coded denoting actual new language (*red text*) and language that has simply been moved (*green text*) – again, the latter representing the majority of the revisions.

Draft Program Evaluation Standards Revisions

Legend:

New Text

Text Moved from Another Section (Conceptual, moved language may not be exact)

Text Moved to Another Section

~~Deleted Text~~

[Editorial Comment]

CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION II – PROGRAM REQUIREMENTS

A. General Requirements

4. Program Evaluation[1]

   a. The school has a systematic and evidence-based ***program evaluation*** process ***for each occupational program or each group of related occupational programs (referred to hereafter as "program area") designed*** to***:***

      i. ~~e~~*E*valuate curriculum and course content (~~–~~ i.e., academic general education, applied general education, technical and occupational courses, electives, etc.~~)~~*,;*

      ii. ~~a~~*A*ssess the appropriateness of that coursework in relation to program objectives~~,~~*;*

      iii. ***Assess the adequacy of program equipment and supporting resource materials;***

      iv. ~~a~~*A*ssess ***student achievement outcomes*** and program viability~~,~~*; and*

      v. ~~to m~~*M*ake revisions to the curriculum as deemed necessary.

   b. The school's program evaluation process is comprehensive, *conducted by faculty and educational administrators regularly, and uses* ~~includes~~ *input from* internal and external *sources* ~~benchmarking~~, ~~and is conducted by faculty and educational administrators and external resources.[2]~~ *including, but not limited to, the following:*

      i. *An independent and diverse Program Advisory Committee for each program area to review the established curricula of the program/program area, instructional-related program materials, equipment and facilities, and student achievement outcomes as a means to provide the school with an external review of its programs (see Appendix III for more specific requirements for Program Advisory Committees);*

      ii. *Student and alumni input collected through regular surveys, student governance groups, inclusion on Program Advisory Committees, community building initiatives, or other formal and informal means; and*

      iii. *As useful, needed, and appropriate:*

         1. *Subject-matter specialists;*

---

[1] *See Appendix III for more specific requirements for program evaluation and Program Advisory Committees.*
[2] ~~Examples of external resources include subject-matter specialists; the teaching and learning professional community; independent Program Advisory Committees; employers, technicians, and practitioners representing industry and the employment community; professional societies; and trade associations.~~

2. *Employers, independent technicians, and practitioners representing industry;*

3. *The teaching and learning professional community;*

4. *Externship, practicum, and clinical sites;*

5. *Professional societies;*

6. *Trade associations; or*

7. *Other similar resources.*

c. The school must provide evidence that it gives consideration to *the input and feedback provided by the* Program Advisory Committee*(s), students, alumni, employers, and other sources which are a part of its program evaluation process*.[1]

~~c~~*d*. The school's program evaluation process is ongoing with set intervals for evaluation and is included as part of its institutional assessment and improvement planning activities (see *Section I (B), Substantive Standards, Standards of Accreditation* for details regarding institutional assessment and improvement requirements).

~~6. Program Advisory Committee~~

~~Each occupational program or each group of related occupational programs (referred to hereafter as "program area") has an independent Program Advisory Committee. The purpose of the Program Advisory Committee is to review the established curricula of the program/program area, instructional related program materials, equipment and facilities, and student achievement outcomes as a means to provide the school with an external review of its programs. Program Advisory Committees must be comprised of appropriately qualified representatives external to the institution (i.e., non-school employees) who can provide a meaningful review of the school's programs and supporting resources and materials.[2]~~

~~a. For each non-degree and undergraduate degree program area, the school must have a diverse Program Advisory Committee that includes representatives from the employment community, practitioners, and others from the field of education, regulators, etc. as appropriate. In all instances, Program Advisory Committee meetings must include at least three members in attendance that represent the employment community and/or practitioners from the program area.~~

~~b. For each master's degree program area, the school must have a diverse Program Advisory Committee that includes qualified representatives from the employment community, practitioners, and other individuals with graduate level education experience who are not employed by the institution such as graduate students, alumni, graduate faculty from other institutions, etc. as appropriate. In all instances, Program Advisory Committee meetings must include at least three members in attendance that represent the employment community and/or practitioners for the program area and at least two individuals with graduate level education experience qualified to review and comment on the school's graduate level education.~~

~~c. At least two regularly scheduled meetings must be conducted annually, one of which must be held at the school. Written and detailed minutes of each meeting must be maintained and include a description of all members in attendance (i.e., names, titles, and affiliations); the date,~~

---

[1] ~~Evidence in this regard can take many forms, one such being the disclosure of the school's consideration recorded in Program Advisory Committee meeting minutes, whereby a school describes whether recommendations were implemented or not and explains the school's decisions.~~

[2] Programs and courses with distance education approval have additional Program Advisory Committee requirements. See *Section IX (D)(6), Substantive Standards, Standards of Accreditation*.

time, and location of the meeting; and a comprehensive and clear description of the review of and commentary made by the school representatives and the Program Advisory Committee members.

d. Program Advisory Committee review and comment activities must include:

i. Review, at least annually, the established curriculum of the program and comment as to the appropriateness and adequacy of the program objectives, program length, curriculum content (including academic general education or applied general education as appropriate), learning resources, and the adequacy of facilities and equipment.

ii. Review and comment, at least annually, on student graduation, graduate employment, and where required, state licensing examination outcomes of each program.

iii. Review and comment on the appropriateness of curriculum objectives, program length, and curriculum content of all new programs prior to submission for Commission approval.

e. The school must provide evidence that it gives consideration to Program Advisory Committee input.[1]

f. Multiple affiliated schools may use a single Program Advisory Committee to review the same established curricula of a program area and student achievement outcomes across the system of schools, however, the physical review of a school's learning resources, facilities, and equipment must be fulfilled via an on-site review at each individual campus.[2]

---

[1] Evidence in this regard can take many forms, one such being the disclosure of the school's consideration recorded in Program Advisory Committee meeting minutes, whereby a school describes whether recommendations were implemented or not and explains the school's decisions.

[2] For example, a school may use a non-local Program Advisory Committee for all affiliated schools to review the curriculum of a program area and use a local Program Advisory Committee for the physical review of the school's learning resources, facilities, and equipment.

ACCSC STANDARDS OF ACCREDITATION
APPENDIX III – ~~DEFINITION OF A CREDIT HOUR~~ *PROGRAM REQUIREMENTS*

DEFINITION OF A CREDIT HOUR

****

PROGRAM EVALUATION – PROGRAM ADVISORY COMMITTEE

In accordance with Section II (A)(4)(b), Substantive Standards, Standards of Accreditation, schools are required to have an independent Program Advisory Committee for each occupational program or program area to review the established curricula of the program/program area, instructional-related program materials, equipment and facilities, and student achievement outcomes as a means to provide the school with an external review of its programs. The following sets forth more specific criteria for Program Advisory Committees.

1. *Program Advisory Committees must be comprised of appropriately qualified representatives external to the institution (i.e., non-school employees) who can provide a meaningful review of the school's programs and supporting resources and materials.[1] These include representatives from the local employment community, practitioners, and others from the field of education, regulators, etc. as appropriate and necessary to fulfill the guidelines below for a functioning Program Advisory Committee;*

2. *The school must conduct at least ~~two~~one regularly scheduled meeting annually ~~one of which must be held at the school~~with the following guidelines:*

   a. *At least three members that represent the employment community and/or practitioners from the program area must be in attendance in order to be considered a Program Advisory Committee meeting;*

   b. *Written and detailed minutes of each meeting must be maintained and include:*

      i. *A description of all members in attendance (i.e., names, titles, and affiliations);*

      ii. *The date, time, and location of the meeting; and*

      iii. *A comprehensive and clear description of the review of and commentary made by the school representatives and the Program Advisory Committee members;*

   c. *Program Advisory Committee review and comment activities must include:*

      i. *The established curriculum of the program and commentary as to the appropriateness and adequacy of the program objectives, program length, curriculum content (including academic general education or applied general education as appropriate), learning resources, and the adequacy of facilities and equipment;*

      ii. *Student graduation, graduate employment, and where required, state licensing examination outcomes of each program; and*

      iii. *For any new program, the appropriateness of curriculum objectives, program length, and curriculum content prior to submitting an application for Commission approval.* **[May be moved to new program application process in the *Rules*]**

---

[1] *Programs and courses with distance education approval have additional Program Advisory Committee requirements. See Section IX (D)(6), Substantive Standards, Standards of Accreditation.*

d. *Although it is preferable for Program Advisory Committees to be on-site at the institution for a physical review of the equipment and facilities, this may not always be feasible particularly for distance education programs. If the Program Advisory Committee meeting is not held at the physical campus of the school, then the school must provide the committee with a sufficiently detailed description of the equipment and facilities and include a virtual tour representing current conditions at the school.*

e. *In addition to the requirements above:*

   i. *For each master's degree program/program area, the* ~~school must have a diverse~~*Program Advisory Committee must also includes~~ at least two individuals with graduate level education experience such as graduate students, alumni, graduate faculty from other institutions, etc. as appropriate.*

   ii. *For programs or courses of study that include content delivered via distance education, Program Advisory Committees must include at least one additional individual with experience in the delivery of distance education programs who is qualified to review and comment on the school's distance education platform, methods, processes, procedures, and infrastructure in the context of the program/course content and objectives.* **[To be aligned with or removed from** *Section IX (D)(6), Substantive Standards, Standards of Accreditation***]**

3. *The school must provide evidence that it gives consideration to Program Advisory Committee input.*[1] *Evidence in this regard can take many forms, one such being the disclosure of the school's consideration recorded in Program Advisory Committee meeting minutes, whereby a school describes whether recommendations were implemented or not and explains the school's decisions.*

4. *Multiple affiliated schools may use a single Program Advisory Committee to review the same established curricula of a program area and student achievement outcomes across the system of schools, however, the physical review of a school's learning resources, facilities, and equipment must be fulfilled for each individual campus.*[2] *For example, a school may use a non-local Program Advisory Committee for all affiliated schools to review the curriculum of a program area and use a local Program Advisory Committee for the physical review of the school's learning resources, facilities, and equipment.*

---

[1] ~~Evidence in this regard can take many forms, one such being the disclosure of the school's consideration recorded in Program Advisory Committee meeting minutes, whereby a school describes whether recommendations were implemented or not and explains the school's decisions.~~

[2] ~~For example, a school may use a non-local Program Advisory Committee for all affiliated schools to review the curriculum of a program area and use a local Program Advisory Committee for the physical review of the school's learning resources, facilities, and equipment.~~

Tuition, Cancellation, and Refund Policies
Section I (D), Substantive Standards, Standards of Accreditation

The Commission has reviewed is standards in the areas of tuition, cancellation, and refund policies and has proposed revisions meant to better organize this section and to clarify expectations. The proposed revisions specifically clarify:

• For tuition policies: The term "fairly applied" covers all tuition costs and charges, tuition discounts, and all costs incidental to training rather than just tuition discounts as is currently implied and the section has been reorganized to make this expectation clear.

• For scholarships: This is a clarification that "scholarships" are distinct from a tuition discount, and that scholarship funds are in fact applied to the tuition otherwise charged by the school (i.e., otherwise, such a reduction is a tuition discount). The Commission is particularly interested in hearing from schools on this issue and how scholarships are issued and funds applied to student tuition accounts.

• For cancellation and refund policies: The language has been updated to clarify the differences between a cancellation policy and a refund policy along with how written notification may be used.

The section has been reorganized into four policy categories for clarity. The Commission does not believe these proposed reorganization represent a substantive modification; however, the Commission is interested in the perspective of the schools and any comments that schools may have with regard to the proposed revisions.

Proposed new text in *Red, Bold, and Italic* print, deleted text in ~~blue strikethrough~~, and moved text is in *Green, Bold, and Italic* print.

CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION I – OWNERSHIP, MANAGEMENT, AND ADMINISTRATION

D. **Tuition, Cancellation, ~~and~~ Refund*, and Payment* Policies**

    1. *Tuition Policies: All charges must be as set forth in the catalog, enrollment agreement, and accompanying addendum(s).*

        a. Tuition costs and charges, tuition discounts, and all costs incidental to training are*:*

            i. *Fully, clearly, and accurately* disclosed to the prospective student before enrollment *and*

            ii. *Fairly applied*.

        b. *A* ~~T~~*t*uition discount~~s offered to prospective students~~ must be *a* bona fide (~~i.e., represent~~ actual reduction~~s~~ in the tuition that would otherwise be charged~~) and must be fairly applied~~.

        ~~2~~*c*. A *grant or* scholarship *– as distinct from a tuition discount – must be* ~~is a~~ bona fide financial ~~grant-in-aid~~ *assistance whereby funds are applied toward* ~~to~~ a qualified student*'s costs;* ~~that is~~ issued for recognized and acceptable purposes*;* ~~that~~ *and* include specified criteria that a student must meet in order to be eligible for and receive the *grant or* scholarship.

        ~~3~~*d*. Tuition changes in programs are bona fide and effective on specific dates. Tuition for students currently in school is changed only if authorized in the enrollment agreement and only if reasonable advance notice is provided.

    ~~4~~*2*. Cancellation Policies*: The school must have and apply a fair and equitable cancellation policy also in compliance with state or third-party requirements that minimally conforms to the following:*

a. *An* ~~A~~*a*pplicant who ha~~sve~~ not visited the school prior to enrollment ~~will have the opportunity to~~ *may* withdraw without penalty *by requesting cancellation* within three business days following either the regularly scheduled orientation procedures or following a tour of the school facilities and inspection of equipment where training and services are provided.

b. *An applicant requesting cancellation* ~~All monies paid by an applicant must be refunded if requested~~ within three days after signing an enrollment agreement and making an initial payment *is entitled to a refund of all monies paid by the applicant*.

c. An applicant requesting cancellation more than three days after signing an enrollment agreement and making an initial payment, but prior to entering the school, is entitled to a refund of all monies paid minus a registration fee of 15% of the contract price of the program, but in no event may the school retain more than $150.

5~~3~~. *Refund Policies: The* ~~Each~~ school must have and apply a fair and equitable refund policy also in compliance with state or third-party requirements, or in the absence of such requirements in accordance with generally accepted practices.

a. In all instances, a school's refund policy must contain minimally the following elements:

   i. How refunds are calculated (e.g., pro rata);

   ii. The date from which refunds will be calculated; and

   iii. The time frame within which refunds will be made.

b. Written notification of withdrawal from the student shall not be required for refund payment.

c. In no instance may a school make required refunds in excess of 90 days from the student's withdrawal or termination date.

d. In instances where state or third-party requirements and accrediting requirements conflict, the more stringent requirement shall apply.

e. The refund policy must be disclosed consistently in the catalog and enrollment agreement and the language in the catalog and the enrollment agreement shall not be in conflict.

4. Payment Policies:

a. Requirements for student tuition and fee payments must be as set forth in the enrollment agreement, accompanying addendum(a), or other applicable documents (e.g., financial aid forms);

6*b*. If promissory notes or contracts for tuition are sold or discounted to third parties, either the student signing such note, or the financial sponsor who signed the note, must sign a statement authorizing such sales~~.~~*; and*

7*c*. Methods used by a school in requesting or demanding payment are in good taste and follow sound and ethical business practices.

~~8.~~ *Schools are required to provide to the Commission, on an annual basis, required tuition, fees, and length for each recognized program. Moved to:*

CHAPTER 1 – RULES OF PROCESS AND PROCEDURE

SECTION V – ANNUAL REPORT, NOTIFICATIONS, AND OTHER REPORTING

B. Annual Report

7. *Schools are required to provide to the Commission, on an annual basis, required tuition, fees, and length for each recognized program.*

Licensure Rate Disclosure
Section IV (C)(3), Substantive Standards, Standards of Accreditation

Per the current standards, a school is required to disclose, minimally, the graduation and graduate employment rate for each program offered as last reported to the Commission (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). However, although schools are required to maintain acceptable pass rates on licensure/certification exams where required by governmental entities to work in a particular field (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*) and to report these pass rates as part of the annual report, the *Standards* do not currently require schools to disclose those rates to students. The Commission believes the disclosure of all required outcomes is in alignment with the expectations for appropriate and necessary disclosures to prospective students. Accordingly, the Commission is proposing the following revision to the *Standards of Accreditation*.

Proposed new text in ***Red, Bold, and Italic*** print; deleted text is in ~~blue strikethrough~~.

CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION IV – STUDENT RECRUITMENT, ADVERTISING, AND DISCLOSURES

C. Disclosures

3. Student Achievement Rates:

   A school discloses, minimally, the graduation***,*** ~~and~~ graduate employment ~~rate~~***, and licensure pass rates, where applicable,*** for each program offered as last reported to the Commission. The disclosure for each program's graduation ~~and~~***,*** graduate employment***, and licensure pass*** rate must be accurate, not intended to mislead, and include~~s~~ the program population base and time frame upon which each rate is based.