

## ACCSC ACCREDITATION ALERT

**To:** ACCSC Accredited Institutions and Other Interested Parties

**From:** Michale S. McComis, Ed.D., Executive Director

**Date:** July 1, 2021

**Subject:** Call for Nominations and Revisions to the ACCSC *Standards of Accreditation*

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### Announcements/Reminders:

- **Call for Nominations for the ACCSC Commissioners**
- **Call for Nominations for the ACCSC Nominating Committee**

### Revisions to the *Standards of Accreditation*

#### Revisions to the ACCSC *Rules of Process and Procedure*

- ***Section I (A)(2)***
- ***Section I (A)(10), (D)(4)(d), & (G)(2)(b)***
- ***Section I (E)(2)***
- ***Section I (E)(5) & Section III (B)(1)***
- ***Section IV (C)(2)(b)(iv) & (E)(3)***
- ***Section IV (E)(2)(r)(iv)***
- ***Section IV (F)(4)***
- ***Section V (E)(2)(k&l)***
- ***Section IX (C)***
- ***Section X (D)(6)***

#### Revisions to the ACCSC *Substantive Standards, Standards of Accreditation*

- ***Section I (B)(1-2)***
- ***Section I (D)(5) & (6-8)***
- ***Section IV (B)(3)***
- ***Section IV (B)(4)***
- ***Section IX Glossary of Distance Education Terms***
- ***Appendix I – Accreditation Fees***
- ***Appendix II – Application, Reports, Forms, and Instructions***

The Commission has republished the *Standards of Accreditation*, which is now dated July 1, 2021 and replaces the July 1, 2020 version. The July 1, 2021 *Standards of Accreditation* are available for download at <http://www.accsc.org/Accreditation/Standards-of-Accreditation.aspx>. Schools must use the most recently updated forms and reports found at <https://www.accsc.org/Forms-and-Reports/Forms-And-Reports.aspx>

### Guidance Issued:

- ***Admissions Documentation***
- ***Leave of Absence Policy***
- ***Clock to Credit Hour Conversion***

All revisions and fees changes are effective July 1, 2021 unless otherwise indicated in the *Standards of Accreditation*. 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).

## Call for Nominations to Serve as an ACCSC Commissioner

On behalf of the Accrediting Commission of Career Schools and Colleges (ACCSC) and in accordance with the organizational *Bylaws*, the ACCSC Nominating Committee seeks nominations of potential candidates to serve on the ACCSC Board of Directors as a Commissioner.

During this nomination cycle, the ACCSC Nominating Committee is charged with filling the following three (3) upcoming vacancies on the Commission:

- One School Commissioner elected four-year term that begins July 1, 2022 and ends June 30, 2026;
- One School Commissioner appointed four-year term that begin July 1, 2022 and ends June 30, 2026; and
- One Public Commissioner appointed four-year term that begins July 1, 2022 and ends June 30, 2026.

A **Public Commissioner** is a person who:

- i. Has experience in industry, government, education (e.g., accreditation, postsecondary, public, private, adult or vocational/career-oriented), or in similar or allied fields;
- ii. Is not an employee, member of the governing board, owner, shareholder, or consultant of an institution that is accredited by the Commission, has applied for accreditation by the Commission, or is affiliated with a School Commissioner or any institution or entity which is also affiliated with a School Commissioner;
- iii. Is not a member of any trade association or membership organization related to, affiliated with, or associated with ACCSC; and
- iv. Is not a spouse, parent, child, or sibling of an individual identified in paragraph (ii) or (iii) of this definition.

A **School Commissioner** is a person who:

- i. Is a proprietor, owner, or bona fide executive of a member of the Corporation as described in Section 2.01 hereof that has been accredited by ACCSC for at least five years;
- ii. Has at least five years of ownership or bona fide executive experience in an ACCSC-accredited school, has participated in at least one full accreditation process with an ACCSC-accredited school, and is active in school operations;
- iii. Has a past record demonstrating:
  1. A commitment to providing quality education to students;
  2. A commitment to ethical, fair, and honest practice; and

## It is Worth It

During my two decades in education, I've witnessed the unbelievable accomplishments of students whose hard work and commitment shaped their dreams into reality.



Those students stepped outside their comfort zone and achieved milestones they didn't think possible. Someone believed in them and told them that the true reward will come from the investment. They worked hard, they stuck with it, and they succeeded.

As I enter my final year serving as an ACCSC School Commissioner, I reflect on this philosophy that I have both witnessed and encouraged in others. Someone believed in my potential to serve as a Commissioner, so I went for it. The work of an ACCSC Commissioner is important; it changes lives. It is hard work and yes, it requires a significant investment of time.

However, I have unequivocally learned that with this investment comes incredible pride and true reward. I encourage you to consider the merits of serving as an ACCSC Commissioner and, if eligible, pursue the nomination process. It is worth it.

A handwritten signature in black ink, appearing to read 'Jen Bergeron'. The signature is stylized and cursive.

Jen Bergeron  
Chair of the Commission

3. Compliance with accrediting standards and applicable federal, state, and local requirements.

The Commission may not have among its membership more than one (1) School Commissioner affiliated with a single member of the Corporation or multiple members of the Corporation under common ownership and control.

The Nominating Committee in nominating candidates and the Commission in appointing Commissioners will, amongst other factors, give consideration to:

1. A nominee's:
  - a. Background, level of experience, and knowledge regarding accreditation, postsecondary education, industry, and Board governance;
  - b. Affiliation with any school that has lost or been denied accreditation by any accrediting agency, been issued a Warning or Probation Order by any accrediting agency, entered into bankruptcy, or closed;<sup>1</sup>
  - c. Involvement in criminal proceedings and any pending or past action (e.g., investigation, inquiry, etc.) in a judicial, law enforcement, or administrative body; and
  - d. Performance and commitment with respect to:
    - i. Providing quality education to students;
    - ii. Ethical, fair, and honest practice; and
    - iii. Compliance with accrediting standards and applicable federal, state, and local requirements;
2. Any comments provided by the Executive Director; and
3. The Commission's goal to achieve a diversity of backgrounds, experiences, and perspectives in order to achieve the purposes of the Corporation.

Nominees should submit the [ACCSC Commissioner Call for Nominations Form](#) accompanied by a current resume **on or before October 15, 2021.**

### **Call for Nominating Committee Nominations**

Individuals interested in standing for election to the ACCSC Nominating Committee should complete the Call for Nomination Form and return it to the Commission office no later than **August 1, 2021**. Minimally, the Commission will select two (2) qualified individuals who are not affiliated with any sitting Commissioner to run for election to fill one vacant seat on the Nominating Committee. The individual that receives the most votes will be considered elected to serve on the Nominating Committee for a two-year term ending June 30, 2023.

Nominees must submit the [Nominating Committee Call for Nominations](#) by **August 1, 2021.**

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<sup>1</sup> The Nominating Committee may not process a nomination from a candidate whose school (to include any affiliated school within a group) which would be the source of eligibility to serve as a School Commissioner is, or within the preceding five years has been, subject to an ACCSC-issued Probation Order or is or within the preceding 12 months has been subject to an ACCSC-issued Warning.

## **Revisions to the ACCSC, Rules of Process and Procedure, Standards of Accreditation**

### ***Section I (A)(2), Rules of Process and Procedure***

A non-substantive change has been made to this section to put the definition of a public member/Commissioner into a codified list.

### ***Section I (A)(10), (D)(4)(d), & (G)(2)(b), Rules of Process and Procedure***

Non-substantive changes have been made to these sections of the *Rules* in order to ensure alignment and consistency throughout with regard to the definition of “continuous operation.”

### ***Section I (E)(2), Rules of Process and Procedure***

A non-substantive change has been made to this section of the *Rules* to state the Commission’s current practice that if the original Accreditation Workshop attendee ceases to be employed by a school during the accreditation process, then the new/replacement employee (e.g., school director) will be required to attend an Accreditation Workshop as is practicable.

### ***Section I (E)(5) & Section III (B)(1), Rules of Process and Procedure***

The Commission has revised this section removing the provisions that “[a]ccredited schools seeking initial accreditation with ACCSC may request an orientation on-site evaluation as part of the initial accreditation process.” The Commission has found that accreditation with another accreditation agency is not a reliable indicator for institutional success in the ACCSC initial accreditation process. In addition, the Commission has added a provision for initial applicants that the Commission may require a second Orientation On-Site Evaluation if the school’s application and Self-Evaluation Report submitted after the initial Orientation On-Site Evaluation fail to demonstrate that the school is prepared to advance to the next phase of the initial accreditation process.

### ***Section IV (C)(2)(b)(iv) & (E)(3), Rules of Process and Procedure***

The Commission has added a new application for a school seeking to use the term “University” in its name.

### ***Section IV (E)(2)(r)(iv), Rules of Process and Procedure***

A non-substantive change has been made to this section in an effort to make more clear the Commission’s expectations for a school on Warning or Probation that seeks approval of a transfer of accreditation that would result from a change of control.

### ***Section IV (F)(4), Rules of Process and Procedure***

The Commission has added a provision that “[t]he Commission will only approve teach-out plans and agreements that meet the requirements of the ACCSC Institutional Teach-Out Plan Approval Form and ACCSC Teach-Out Agreement Approval Form” in alignment with its current practice.

### ***Section V (E)(2)(k&l), Rules of Process and Procedure***

The Commission has added a provision to (k) to require notice regarding the results of any lawsuit or investigation brought against the school, its officers, or employees that determine a violation of any “...accreditation requirements or standards.” The Commission has added a provision to (l) to also include a determination by a “federal” agency that the school is not meeting applicable requirements or is in violation of any “...regulation.”

### ***Section IX (C), Rules of Process and Procedure***

This section previously established a 30-day comment period except that the Commission could allow for a “longer period” of time. Given the trend of changing regulatory requirements and interpretations by the U.S. Department of Education and other regulatory agencies, the Commission has revised this section to give additional flexibility to the Call for Comment period by now stating that “[g]enerally, interested parties will have 30 days to submit...comments; however, the Commission may establish a shorter or longer comment period as may be deemed necessary.”

### ***Section X (D)(6), Rules of Process and Procedure***

Subsection (6) has been added to *Section X (D)* stating that “[t]he Commission will provide the disclosure of Commission actions to the public described [in this section] on its website and establishes the time frames for the publication and removal of the disclosures from the website” as is the Commission’s current practice.

## **Revisions to the ACCSC, Substantive Standards, Standards of Accreditation**

### ***Section I (B)(1-2), Substantive Standards***

The Commission has over time noted findings in evaluation reports and in Commission action letters where a school did not/could not demonstrate that it “plans” for institutional assessment and improvement even though the school could show that such activities do take place in myriad ways. In an effort to a) ensure better consistency in the application of ACCSC’s expectation for institutional assessment and improvement and b) to ensure that the standard’s expectations are clear to all (i.e., schools, assessment teams, and Commissioners), the Commission has revised its standard in this area.

In reviewing this issue, the Commission acknowledged the overall importance of the process, practice, and action of assessment and improvement and concluded that the focus of the standard should primarily be on institutional assessment and improvement as a process and whether a school can demonstrate institutional assessment and improvement activities, using whatever method the school determines works. In some cases, a school might choose to establish a written plan with goals, timelines, and benchmarks. In other cases, a school might choose to show a more fluid approach where assessment is done regularly and improvements are made based upon the contemporaneous collection of feedback as opposed to a more general set of annual goals. In other cases, it may be a combination of these or other methods.

The Commission took into account the comments submitted as part of the Call for Comment process. Generally, the comments were supportive of the proposed revision. One commenter proposed that the Commission rely solely on the Self-Evaluation Report/process to meet the intent of the requirement to demonstrate institutional improvement activities. The Commission found that proposal not sufficiently in alignment with a fundamental and foundational tenet of the accreditation process – ongoing continuous improvement. However, the Commission agreed that a school could use the self-evaluation process as an avenue – one of many – to demonstrate that the school engages in institutional improvement activities. Again, the intent of the revision is to shift focus from the “planning” aspect and to place that focus on the “activity” and action aspect of institutional improvement.

Moreover, the Commission’s intention in the revisions below is not to downplay the importance of planning as a function of assessment and improvement activities. The Commission firmly believes that planning which includes goal setting, established timelines, and benchmarking is a useful practice in institutional assessment and improvement activities and encourages such practices. However, the manner in which institutional assessment and improvement activities occur may be less important than the substance of those activities.

Because the Commission understands the value of diverse approaches, the Commission believes that the results, actions, and activities are the most salient and important elements for review. As such, the Commission’s revisions set for below are meant to elevate substance over form.

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

## SECTION I – OWNERSHIP, MANAGEMENT, AND ADMINISTRATION

### B. Institutional Assessment, ***and Improvement***, ~~and Planning~~ ***Activities***

1. The school must demonstrate that it engages in ***significant and*** ongoing institutional assessment and improvement activities ~~and planning~~ appropriate to the size and scale of the school’s operations and that support the management and administration of the school as well as the quality of education provided. <sup>FN</sup> ~~Institutional assessment and improvement activities should support and enhance the quality of the education provided using information obtained internally (e.g., staff and faculty development and planning, and student input and feedback) and externally (e.g., Program Advisory Committees, employers, community involvement, school graduates, etc.) to validate the school’s educational and administrative practices and to document and improve student learning and achievement. Institutional assessment and improvement activities are expected to be significant and ongoing experiences in the school.~~
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.

<sup>FN</sup> ***Institutional assessment and improvement activities should support and enhance the quality of the education provided. The school should seek to obtain information internally (e.g., staff and faculty development and planning, student input and feedback, etc.) and externally (e.g., Program Advisory Committees, employers, community involvement, school graduates, etc.) to validate the school’s educational and administrative practices and to document and improve student learning and achievement. Planning that includes goal setting, establishing timelines, and benchmarking is a useful practice in institutional assessment and improvement activities and is encouraged.***

#### ***Section I (D)(5) & (6-8), Substantive Standards***

The word “also” has been added to *Section I (D)(5)* to clarify the current expectation that a school’s refund is both fair and equitable and in compliance with state or third-party requirements, or in the absence of such requirements in accordance with generally accepted practices.

*Section I (D)(5)* has also been re-codified whereby the requirement that the school’s refund policy is disclosed consistently in the catalog and enrollment agreement – formerly *Section I (D)(6)* – has been re-codified as *Section I (D)(5)(e)* moving it under the refund policy section. The subsections that follow have been re-numbered as (6-8).

#### ***Section IV (B)(3), Substantive Standards***

In an effort to modernize the language of this section, the Commission has replaced the term “classifieds” with “advertisements.” The intent or scope of the standard does not change with this revision.

#### ***Section IV (B)(4), Substantive Standards***

The Commission has been considering how the use of social media has raised questions from schools, evaluations teams, and in the accreditation process with regard to ACCSC’s advertising standards.

Specifically, with more schools incorporating digital platforms both for instructional and advertising purposes, there has been an increase in inquiries from schools related to advertising on social media platforms as well as an increase in citations. Moreover, several questions have been raised regarding the use of social media content (i.e., share, repost, like, retweet) posted by current students and whether such use constitutes an “endorsement” and in turn requires written consent from the student who posted the content. In the revisions below, the Commission has attempted to develop a path forward that honors the student-centered nature of the existing standards while also removing some potential barriers for member schools to use social media for both promotional and community building purposes.

The Commission has:

- Included a definition of an endorsement;
- Addressed the use images; and
- Set forth guidelines for the use of publically shared media.

With regard to these new standards, the Commission has established a distinction between “endorsements” and “publically shared media.” **The key distinction is origination.** If a school solicits an endorsement for its advertising and the endorser gives such written or verbal statements, then the school must obtain written consent. The requirement for the use of endorsements is otherwise unchanged (although reworded) and continues to prohibit the use of currently enrolled students for such endorsements. However, if “an individual” – including current students – chooses of their own volition to post a comment using publically shared media (e.g., Facebook, twitter, Instagram, etc.), then the school can use/share that post in its own social media and advertising so long as “the media originated with the individual and is bona fide, factually and contextually accurate, unadulterated, and a faithful representation of the shared information or images.”

The Commission reviewed the comments provided in the Call for Comment process and while generally commenters expressed their agreement with the revisions, several did ask for some guidance as to how these standards would be applied. As such, the Commission has provided some illustrative examples below to help show the implementation and interpretation of the new standards.

### **Examples:**

**Scenario:** A school wishes to post/use in advertising a video it has created of students in action. No comments from students or graduates is shared, only the narrator describing the school’s programs and equipment.

**Requirement:** Pursuant to *Section IV (B)(4)(b)*, the school would need to obtain written consent from the students that the school can share their images.

**Scenario:** A school wishes to post/use in advertising a video is has created of students in action that includes former student/graduates providing statements about their positive experiences at the school and after graduation working in their chosen field.

**Requirement:** Pursuant to *Section IV (B)(4)(a-b)*, the school would need to obtain written consent from the former students/graduates that the school can share their endorsements and images.

**Scenario:** A school wishes to post/use in advertising a video it has created of students in action that includes current and former student/graduates providing statements about their positive experience at the school and after graduation working in their chosen field.

**Requirement:** Pursuant to *Section IV (B)(4)(a-b)*, the school would need to obtain written consent from the former students/graduates that the school can share their endorsements and images. However, the school would be in violation of *Section IV (B)(4)(a)*, if in fact the school uses endorsements from currently enrolled students.

**Scenario:** A current student posts to her Facebook account that she just returned from a Blood Drive hosted by her school and had an “awesome experience” helping people and practicing her new skills. In the post, she thanks the faculty and the school director for “making this happen for our community.” The school sees this post and re-posts it to its own Facebook account with the caption “We are so excited to share our student success stories.”

**Requirement:** Pursuant to *Section IV (B)(4)(b)*, so long as the media originated with the individual (i.e., the current student) and is bona fide, factually and contextually accurate, unadulterated (i.e., not changed), and a faithful representation, then no written consent is required.

**Scenario:** A current student posts to his Instagram account that he is upset with the current training he is receiving because the equipment is completely out of date. In the post he says “I had a great experience at the beginning, but now I think this school is terrible and I just feel let down.” The school sees this post and re-posts only the portion that says “I had a great experience.”

**Requirement:** In this scenario, the school would be in violation of *Section IV (B)(4)(b)*, because the school has taken a quote out of context and portrayed it in a positive light when in fact the students was expressing a negative experience. This would not be considered a “faithful representation” or “contextually accurate” depiction of the original social media post.

**Scenario:** A school informs its students that for each five “likes” or a “shout outs” given on their social media accounts will earn them a five dollar credit at the bookstore.

**Requirement:** In this scenario, the school would be in violation of *Section IV (B)(4)(b)*, because the school is essentially “paying” students to post positive comments.

Also, please note that while the Commission has deleted the phrase “which is kept on file and subject to inspection,” this does not remove the expectation that the school can support its use of endorsements with written consent as required and necessary. This phrase has only been removed because it is a universal expectation of the accreditation process that a school has the burden to demonstrate its ongoing compliance with accrediting standards and is stated as such in *Section I (F-G), Rules of Process and Procedure, Standards of Accreditation*. Re-stating this well-known and well-understood requirement here is unnecessary and redundant.

Having said that, schools are advised to maintain documentation of the content used as a means to demonstrate context and accuracy and because if the original content is removed (e.g., a post is deleted), then the school may not be able to carry its burden to provide evidence to support compliance with the Commission’s expressed expectations in *Section IV (B)(4)(c) Substantive Standards, Standards of Accreditation*. In addition, if the school continues to use old social media posts that do not otherwise reflect current conditions at the school, then the school may also be found out of compliance with *Section IV (B)(4)(c) Substantive Standards, Standards of Accreditation*. The school must in all cases be able to carry its burden of demonstrating ongoing compliance with accrediting standards and should remove/discontinue use of the content if the author of the content requests the school to do so.

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## SECTION IV – STUDENT RECRUITMENT, ADVERTISING, AND DISCLOSURES

### B. Advertising, Promotion, Statements, and Claims

#### 4. **Endorsements, Images, and Publicly Shared Media:**

- a. **Endorsements: An endorsement means an individual’s written and verbal statements giving explicit approval or support for the school, its programs, or outcomes.** A school may only use endorsements in school catalogs, literature, or advertising with the written consent of the authors, ~~which is kept on file and subject to inspection~~. Any ~~such~~ endorsement ~~is to~~ **must** be a bona fide expression of the author’s opinions, strictly factual, and a portrayal of currently correct conditions or facts. ~~Under no circumstances may~~ **A school may not use endorsements from** currently enrolled students **in promotional activities or advertising** ~~provide endorsements on behalf of a school~~.
- b. **Images: A school may only use student images in school catalogs, literature, or advertising with the written consent of the subjects.**
- c. **Publicly Shared Media: A school may use/share an individual’s publicly shared media (e.g., social media) regarding the school so long as the media originated with the individual and is bona fide, factually and contextually accurate, unadulterated, and a faithful representation of the shared information or images. Schools may not compensate or provide any or other consideration for such use and the school is responsible for compliance with all advertising standards in such use.**

With regard to the use of “student ambassadors” in the admissions process, the Commission reviewed the comments received in the Call for Comment process and found that some commenters had confusion or a misunderstanding of the intent of the proposed allowance or both. Although the Commission’s intent was in school community building and for sharing actual student experience as a part of the admissions process, the comments showed that the proposed language does not clearly enough distinguish the expected limitations and the fact that that students are not recruiters. As such, the Commission has chosen not to revise *Section (IV (A)(3), Substantive Standards, Standards of Accreditation* as proposed in the June 3, 2021 Call for Comment at this time.

### **Section IX Glossary of Distance Education Terms, Substantive Standards**

When the Commission revised the *Statement of Purpose* for *Section IX* last year, the intent was to move the definition of distance education language to the *Glossary of Distance Education Terms* at the end of the section. That language was inadvertently left out in the July 1, 2020 version and as such has now been added to *Section IX Glossary of Distance Education Terms* as originally intended.

***Distance education, as defined by the Commission, is a formal process in which instruction within a program or course of study occurs when the student and instructor are not in the same location at the same time. Distance education employs telecommunication or other electronic technologies (e.g., a learning management system) for the delivery of instruction, and may be synchronous or asynchronous in nature. Distance education teaching and learning activities may be used for a complete program or for a portion of a program employing hybrid or blended distance education.***

Other terms under this section have also been revised to align with the “distanced education teaching and learning activities” language and to provide other clarifying language.

**Appendix I – Accreditation Fees**

**Fee Adjustments for Applications:**

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• **Pre-Workshop Application: \$150**

Application for Change of Name

• Part II: : ~~No Fee~~**\$250**

Application for Initial Accreditation

• **Use of University in Name to be submitted with Part I (if applicable): \$250**

• **Program Fees to be submitted with Part II:**

<b>Program Type</b>	<b># of Active Programs</b>	<b>Fees</b>
<b>Non-Degree Programs</b>	<b>1 to 3</b>	<b>No Fee</b>
	<b>4 to 9</b>	<b>\$500</b>
	<b>10 to 15</b>	<b>\$1,000</b>
	<b>16 to 20</b>	<b>\$1,500</b>
<b>Degree Programs – Occupational Associate, Academic Associate, and Baccalaureate</b>	<b>1</b>	<b>No Fee</b>
	<b>2 to 3</b>	<b>\$1,000</b>
	<b>4 to 9</b>	<b>\$2,000</b>
	<b>10 to 15</b>	<b>\$3,000</b>
	<b>16 to 20</b>	<b>\$4,000</b>
<b>Master’s Degree</b>	<b>Each Program will require a separate Application for Approval of a Master’s Degree Program</b>	<b>\$1,500/each</b>

**Application for the Use of the Term University**

• **Part I: \$750**

• **Part II: 250**

**Fees Related to On-site Assessment Evaluation Fees:**

**On-Site Evaluation Fees:**

The Commission assesses a fee for required on-site evaluations as follows:

- ~~Team Leader, Education Specialist, and Commission Representative: \$1,500 per evaluator for the first day and \$600 per evaluator for each day thereafter.~~
- ~~Occupation/Subject Matter Specialist:
 
  - ~~Local: \$200 per day.~~
  - ~~Non-local: \$1,500 for the first day and \$600 per day thereafter.~~~~

**Initial and Renewal of Accreditation Evaluations:**

- **Orientation Evaluation.....\$2,000**
- **Institutions with three or fewer active programs:<sup>2</sup> .....\$7,500**
- **Institutions with four to nine active program: .....\$9,000**

<sup>2</sup> An active program is a program with enrollment as of the submission of the accreditation application (Part II for initial applicants) or at the time of the accreditation evaluation. A 100% or hybrid distance education program is not considered a separate active program from a residential program for the purpose of calculating these assessment fees.

- *Institutions with ten to fifteen active programs: .....\$12,500*
- *Institutions with sixteen to twenty active programs: .....\$14,000*
- *Institutions with greater than twenty active programs:\$15,000 + \$500 for each additional program*
- *Institutions with more than 500 students are assessed an additional \$2,000.*
- *If an Occupation/Subject Matter Specialist travels more than 200 miles to participate in an evaluation, the institution will be assessed additional travel based-fees on a direct cost basis.*
- *If an evaluation team requires more than two days at the school, then the Commission will assess an additional fee of \$600 per evaluator per day.*
- *If an evaluation requires additional evaluators based up institutional and/or programmatic circumstances the institution will be assessed an addition \$2,000 per evaluator.*

**Substantive Change Evaluations:**

- *The fee for a required substantive change evaluation is \$3,500 with the exception of a Change of Location (less than 25 miles) which is \$2,000.*
- *When combined with another substantive change evaluation or an initial or renewal of accreditation evaluation, the fee for each combined substantive change evaluation is \$500.*

**Unannounced ~~On-site~~ Evaluations Fees:**

~~The Commission assesses a fee for an unannounced on-site evaluation as follows:~~

- Regular Unannounced: \$2,500.00 for the first day and \$600.00 for each day thereafter.
- Commission Directed Unannounced:
  - First Assigned Evaluator: \$2,500.00 for the first day and \$600.00 for each day thereafter.
  - Each Subsequent Assigned Evaluator: \$1,500 per evaluator for the first day and \$600 per evaluator for each day thereafter.

**International ~~On-site~~ Evaluations Fees:**

- ~~On-site~~ Evaluation fees for schools outside of North America (*including Hawaii*) and the Caribbean will be assessed on a direct cost basis if the cost of the evaluation exceeds the fees collected as described above.
- Additional fees may also be assessed to *non-English speaking* schools outside of the United States or its territories to accommodate language translation needs.

**Pass-Through Fees:**

~~The Commission applies a pass through fee for stipends to be paid to Education Specialists and Occupation/Subject Matter Specialists. The following fees are applied:~~

- ~~Education Specialist: \$175 per day/review.~~
- ~~Occupation/Subject Matter Specialist: \$100 per day/review.~~

*As applicable, additional pass through fees will apply for stipends to be paid to Team Leaders, Education Specialists and Occupation/Subject Matter Specialists when such fees have not been included in the evaluation fees described above.*

**Special Circumstances:**

*In instances where special circumstances exists that are not covered by the fees included here, the Commission may charge additional fees to cover the costs associated with the review/evaluation.*

**Appendix II – Application, Reports, Forms, and Instructions**

**Application for the Use of “University” in School Name-Part I/II**

The Commission has added an “Application for the Use of “University” in School Name to be used by a currently accredited school seeking to change its name to use the term “University.”

**Graduation and Employment Chart**

For students who take an approved leave of absence (“LOA”), the rule is that “the clock stops ticking” with regard to the requirement that a student complete a program within 150% of the normal length of a program. This can mean in some instances that students on an extended leave of absence – e.g., six months – cannot be tracked on the ACCSC Graduation and Employment Chart because the reporting period formula is calendar based and cannot take into account a “clock stoppage.” See the example timelines below:

Start Date	LOA Date	Normal Grad Date	LOA Return Date	150% Grad Date (18 Mos.)	Earliest LOA Grad Date
Jan. 2020	Sept. 2020	Dec. 2020 (12 Mos.)	Mar. 2021	June 2021 (18 Mos.)	Sept. 2021
Jan. 2020	Feb. 2020	June. 2020 (6 Mos.)	Aug. 2020	Sept. 2020	Feb. 2021

In this example, the student could not graduate within 150% of the program length due to an approved leave of absence. In such instances in the past, staff has advised schools to remove the student from the cohort because of its *de minimis* impact and due to not wanting to penalize the school or a program graduation rate for this allowable and acceptable LOA practice.

Given the current pandemic and more students taking extended LOAs and because the Commission and US Department of Education have both extended LOA periods, the Commission anticipates these types of circumstances will be more prevalent. Accordingly, the Commission has changed the way these instances/students can be treated for tracking purposes on the Graduation and Employment Chart so that a school can account for all students in all instances.

Specifically, the Commission has modified the Transfer to / Transfer from Another Program categories on the Graduation and Employment Chart to include students that transfer between cohorts due to an extended LOA. The categories have been renamed as Transfer to/Transfer from Another Program ***or Another Cohort***. The Graduation and Employment Chart Glossary definitions for these categories have been revised to include students who were unable to graduate within 150% of the program length based on their original cohort start date due to an approved LOA as follows:

New text in ***Red, Bold, and Italic*** print

Transfers to Another Program/***Cohort***:

1. The total number of students who transferred out of this program and into another ACCSC-approved program at the school.
2. ***The total number of students for this program who:***
  - a. ***Return from an approved leave of absence;***

- b. Are unable to complete the program within 150% of the normal program length from the original start date due to the leave of absence; and*
- c. Transfer to a later cohort in order to graduate within 150% of the normal program length as adjusted based on the length of the approved leave of absence.*

Transfers from Another Program/*Cohort*: The total number of students who transferred into this program from another ACCSC-approved program at the school and whose progress in the program is concurrent with the students in this class start date *and the total number of students for this program who return from an approved leave of absence and transfer from an earlier cohort as allowed by the “Transfers to Another Program/Cohort” glossary definition.*

## Interpretative Guidance

### Admissions Documentation

On March 19, 2020 and December 21, 2020, ACCSC issued guidance permitting schools to obtain a signed attestation by a student to serve as “documentation” that the student has met the school’s admissions requirement (e.g., possesses a high school credential, college degree, GED, etc.). The guidance issued stated that the signed attestation must indicate that the student has earned the credential required by the school’s admissions requirements but cannot provide documentation of that credential due to a school district/school closure. That guidance also expressed the expectation that the school will support its admissions decisions with independent documentation – e.g., transcripts, proof of diplomas and GEDs, etc. – as soon as practicable after the district or school from which a student earned a credential reopens and can fulfill such requests. The Commission extended this allowance to be in effect until **June 30, 2021**.

The admissions documentation allowance described above and issued in the previous guidance documents has not been extended. Therefore, the Commission requires institutions to maintain compliance with *Section V (A)(4), Substantive Standards, Standards of Accreditation* in the normal course and to secure documentation that an applicant meets the school’s admission requirements prior to enrollment. However, the Commission will consider requests via the waiver process for schools that may experience extenuating circumstances in their communities.

### Leave of Absence Policy

In the December 1, 2020 Accreditation Alert, the Commission notified ACCSC-accredited schools that, given the COVID-19 pandemic, the Commission adjusted its standard in this area to allow a leave of absence period to be up to 365 days within any 12-month period for the timeframe March 15, 2020 through June 30, 2021. That Alert also stated that the Commission would revisit this topic at its May 2021 meeting to decide whether the expanded leave of absence period should be extended beyond June 30, 2021.

The Commission considered this topic and determined not to extend the leave of absence expansion June 30, 2021. However, the Commission will consider expanded leave of absence periods via the waiver request process for schools that may experience extenuating circumstances.

### Clock to Credit Hour Conversion

The regulations for distance education and innovation promulgated July 1, 2021 include changes to the clock-to-credit conversion for career-training programs that do not lead to a degree or in which each course within the program is not acceptable for full credit toward a specific degree program at that institution. Previously, the regulations allowed such programs to demonstrate that each semester or quarter hour included at least 7.5 hours or 5 hours of out-of-class work, respectively, to calculate financial aid credits based on a different formula. As such, ACCSC incorporated the assessment and review of out-of-class work

as part of the academic credit hour, documenting for schools the additional out-of-class work hours as part of the ACCSC program approval process. The recognition of the out-of-class work for academic credits allowed institutions to utilize a different formula when calculating federal financial aid credit hours for non-degree programs.

The new regulations remove the option to include the out-of-class work in the calculation of federal financial aid credit hour calculations for career-training programs that do not lead to a degree or in which each course within the program is not acceptable for full credit toward a specific degree program at that institution. The new regulation requires schools to calculate financial aid credits based on seat-time only, using 30 in-class clock hours to each semester credit hour or 20 in-class clock hours to each quarter credit hour. While this may change the financial aid calculations, the ACCSC calculations for academic credit hours will **NOT** change.

ACCSC has always expected credit-bearing courses to include out-of-class work and will continue to maintain that expectation. As noted in *Section II (A)(3)(f), Substantive Standards, Standards of Accreditation*, ACCSC requires that for programs to be recognized in credit hours, the program must be comprised of a majority of courses that require out-of-class work/preparation. Programs that do not have an out-of-class work/preparation component are considered clock-hour programs. A school must be able to justify the number of hours estimated and types of assignments for out-of-class work/preparation.

ACCSC has modified the **Outline of a Non-Degree Program** to reflect only the total out-of-class hours that the school has determined appropriate for each course. Going forward, schools are required to utilize the new Outline of a Non-Degree Program dated July 1, 2021.

If a school modifies the previously reported out-of-class work and that modification changes the overall credit hours of the program, schools must submit the appropriate modification application and the new Outline for a Non-Degree Program, which can be found on the ACCSC website under “Forms and Reports.”