

ACCSC ACCREDITATION ALERT

To: ACCSC Accredited Institutions and Other Interested Parties

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

Date: July 1, 2022

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

Announcements/Reminders:

- Call for Nominations - ACCSC Commission
- Call for Nominations - ACCSC Nominating Committee

Revisions to the *Standards of Accreditation*:

Chapter 1 – Rules of Process and Procedure

- Section I (B)(5)(b)
- Section III (A-H)
- Section IV (C)(2)
- Section IV (E)(5)(a)(xi)
- Section IV (E)(6)(f)(i)

- Section V (A)(1)
- Section V (A)(5)
- Section V (B)(2)
- Section V (B)(8)
- Section V (C)(1-5)
- Section V (E)(2)(g)

- Section VI (A)(1)(d)
- Section VI (A)(4)(c)

- Section VII (H)(1)
- Section VII (J)(1-3)
- Section VII (J)(5)
- Section VII (K)(1-8)
- Section VII (L)(1&7)
- Section VII (M)(1-2)
- Section VII (P)(5)
- Section VII (P)(6)
- Section VII (Q)(4)

- Section VIII (C)(4)

Chapter 2 – Substantive Standards

- Section I (D)(1-4)
- Section I (G)(3)

- Section II (A)(4&6)
- Appendix III – Program Requirements

- Section IV (C)(3)

- Appendix I – Accreditation Fees

The Commission has republished the *Standards of Accreditation*, now dated July 1, 2022 replacing the previous version. The July 1, 2022 *Standards of Accreditation* document is 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:

Utilization of Online Learning Tools and Approval of Distance Education

All revisions and fees changes are effective July 1, 2022 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.

A Message from the ACCSC Chair of the Commission

My name is Carol Palacios, I am the Chair of ACCSC and I have been an ACCSC Commissioner for the past 6 years. My almost 20 year journey in the service of education started during my childhood growing up in a family of educators and University leaders. As such, I grew up understanding that education is life-changing; and that those entrusted with the delivery of education – the institutions – have a great deal of responsibility and accountability in ensuring a quality education and to support students in their road to success.



My background shaped my passion for education. From being exposed to different cultures and learning methods as an international student in different countries, to learning a second and third language, to playing sports through which traits, values, and skills are developed that last a lifetime, I realized that education is the key. Moreover, through my leadership role at my institution I developed a passion for student success. Seeing the life-changing stories of many graduates as a result of their dedication, but also and unequivocally because of the great work, commitment, and passion of my colleagues in Admissions, Academics, Career Services, Financial Aid, Distance Education, and more, following ACCSC standards has been both rewarding and reassuring of the great impact we can have in students' lives and their success.

One of my most fulfilling experiences, both professionally and personally came when I was elected as an ACCSC Commissioner. I was honored and humbled to take my passion to a level that would have a greater impact. Volunteering with ACCSC has allowed me the privilege to serve with peers that share the same passion for student success, who uphold ACCSC standards to the highest levels, and who ensure to maintain its well-earned reputation. We devote a significant amount of time, energy, and effort engaging in intense peer review and using objective judgment to make hundreds of

accreditation decisions. What stands out for me amongst all of this effort is that what we do is life-changing – because we put students first.

As an ACCSC Commissioner I have witnessed the incredible achievements of hundreds of ACCSC institutions whose hard work and commitment have allowed them to flourish and remain successful. I have also seen how thousands of graduates have turned their dreams into reality and perform successfully in the workforce at national and international levels. As ACCSC Chair, I am united by an enormous commitment to this organization, to the institution I represent, to the schools, colleges, and Universities that are part of ACCSC, and even more so, to the students, alumni, and the employment community that opens the doors to our graduates. It is an enormous pride to represent so much talent.

As such, I invite you to share your passion and volunteer. We all have different backgrounds and different stories, but chances are we all share a similar passion and equal feeling for serving students and ensuring quality education that enhances their opportunities in the workplace. I invite you to consider serving, it is so rewarding.

A mis colegas de habla hispana, los invito a compartir su pasión por la noble causa del servicio a la educación:

Mi nombre es Carol Palacios, Chair de ACCSC y Commissioner desde hace 6 años. Mi camino de casi 20 años al servicio de la educación comenzó mucho antes y durante mi infancia habiendo crecido en una familia de educadores y líderes universitarios. Como tal, crecí entendiendo que la educación cambia vidas; y que aquellos encargados de impartir educación – las instituciones – tienen una gran responsabilidad de garantizar un servicio educativo de calidad para apoyar a los estudiantes en su camino al éxito.

Mi pasión ha sido la educación – a lo largo de mi vida he estado expuesta a diferentes culturas, estudios, y métodos de aprendizaje como estudiante internacional en diferentes países, aprendiendo idiomas como segunda lengua,

siendo deportista donde desarrollé virtudes, valores y destrezas que duran para toda la vida; y así entendí que la educación es la llave.

Luego, mi rol en la institución que represento me llevó a desarrollar una pasión por el éxito estudiantil. Ver como día a día cambiamos vidas de muchos graduados como resultado de su dedicación, pero también e inequívocamente gracias al gran trabajo, compromiso y pasión de mis colegas en Admisiones, Academia, Ayuda Financiera, Servicios estudiantiles, Educación Online, y más, siguiendo las mejores prácticas y estándares de acreditación, es tan gratificante y fortalece mi convencimiento sobre el gran impacto que podemos tener en la vida de tantos estudiantes y su futuro.

Una de mis experiencias más gratificantes, tanto profesional como personalmente, fue cuando fui elegida como ACCSC Commissioner. Ha sido un orgullo enorme poder llevar mi pasión a un nivel que tiene un mayor impacto. Ser ACCSC Commissioner me ha dado el privilegio de servir con compañeros que comparten la misma pasión por el éxito estudiantil, y que mantienen los estándares de ACCSC en los más altos niveles y su reputación intacta. El trabajo que amerita es serio. Dedicamos una cantidad de tiempo significativa, energía, y esfuerzo en una intensa revisión por pares utilizando juicio objetivo para la toma de cientos de decisiones de acreditación. Pero lo que más destaca para mí en todo este proceso que hacemos, es que lo que hacemos cambia vidas – porque ponemos siempre a los estudiantes primero.

Como ACCSC Commissioner, he podido ser testigo de los increíbles logros de cientos de instituciones de ACCSC cuyo arduo trabajo y compromiso las ha llevado a florecer y mantenerse exitosas; como también he podido ver como miles de graduados han convertido sus sueños en realidad y hoy en día se desempeñan exitosamente en el mercado laboral a nivel nacional e internacional. Como Chair de ACCSC me une un compromiso enorme a esta organización, a la institución que represento y a mis compañeros de trabajo, a todas las escuelas y universidades que forman parte de ACCSC, y más aún, a los alumnos, exalumnos, y a la comunidad laboral que abre las puertas a nuestros egresados. Es un orgullo enorme representar tanto talento.

Los animo a compartir su pasión, y a considerar los méritos de servir. Todos tenemos historias diferentes, pero es muy probable que compartamos una misma pasión y sentimiento por servir a la noble causa de la educación, y el deseo de garantizar una educación de calidad que mejore el éxito de nuestros estudiantes en el mercado laboral.



Carol Palacios
Chair of the Commission

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:

- Two School Commissioners each elected for a four-year term beginning July 1, 2023 and ending June 30, 2027
- One Public Commissioner appointed for a four-year term beginning July 1, 2023 and ending June 30, 2027

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

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.

The Commission may not have among its membership more than one 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;¹
 - 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 1, 2022.**

Call for Nominations to the Nominating Committee

The ACCSC Nominating Committee – the committee responsibly for finding and vetting candidates to serve on the ACCSC Board of Directors/Accrediting Commission – has two vacancies which need to be filled for the 2023 fiscal year. The Nominating Committee typically meets 2-3 times virtually and once in person for minimally 2 days to participate in Commissioner candidate interviews.

Individuals interested in participating in this process and standing for election to serve on the ACCSC Nominating Committee should complete the Call for Nomination Form and return it to the Commission office no later than **August 1, 2022**. Minimally, the Commission will select three qualified individuals who are not affiliated with any sitting Commissioner to run for election to fill the two vacant seats on the Nominating Committee – one (1) one-year term and one (1) two-year term.

The individual that receives the most votes will be elected to serve on the Nominating Committee for a two-year term ending June 30, 2024. The second highest vote getter will be elected to serve on the Nominating Committee for a one-year term ending June 30, 2023.

Nominees must submit the [Nominating Committee Call for Nominations](#) by **August 1, 2022.**

¹ 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 (B)(5)(b), Rules of Process and Procedure

This revision removes the word “initial” to make clear that the Commission is under no obligation to consider any application it receives.

Section III (A-H), Rules of Process and Procedure

The revisions in this section are primarily a reorganization and recodification of the *Rules* pertaining to the on-site evaluation process. Clarification revisions in this section include the following:

- The Commission may require “additional” Orientation On-Site Evaluations if an applicant fails to demonstrate that the school is prepared to advance to the next phase of the initial accreditation process;
- Clarification and definition pertaining to Commission-directed announced and unannounced on-site evaluations;
- Inclusion of the Commission’s “Regular Unannounced On-Site Evaluation” process established and communicated to the ACCSC membership in a January 1, 2011 Accreditation Alert; and
- Clarification regarding process for potential conflicts of interest.

Section IV (C)(2), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies the types of Level-One Staff Approval Substantive Changes.

Section IV (E)(5)(a)(xi), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies the process whereby an accredited branch campus may apply to the Commission for accreditation as a main school and includes conforming eligibility criteria that the branch campus may not be on Warning or Probation and must receive Commission approval prior to submitting an application if the branch campus in on Reporting

Section IV (E)(6)(f)(i), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies that if a school received initial distance education approval and does not enroll and start students in a distance education modality within 24 months of the approval date, the new distance education modality will cease to be approved.

Section V (A)(1), Rules of Process and Procedure

The revisions to this section of the *Rules* deletes redundant language and distinguishes more clearly regular reports required by the Commission (e.g., the Annual Report and annual financial statements) from Reporting which is an institution specific Commission action to monitor a school’s ongoing compliance with accrediting standards. Language from this section regarding Reporting as a Commission action has been moved to *Section VII (J)* of the *Rules*.

Section V (A)(5), Rules of Process and Procedure

This revision moves the text from *Section V (A)(5)* to *Section VII (J)(5)* of the *Rules* (see below also).

Section V (B)(2), Rules of Process and Procedure

The revision to this section of the *Rules* codifies the Commission’s requirement announced in the July 1, 2013 Accreditation Alert and effective January 1, 2014 for the verification of certain data reported in the Annual Report.

Section V (B)(8), Rules of Process and Procedure

This revision moves the text from *Section I (D)(8)* of the *Substantive Standards* to *Section V (B)(8)* of the *Rules* (see also below).

Section V (C)(1-5), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies that the requirement for an annual “Financial Report” is in fact the Commission’s requirement that institutions submit annual financial statements. The term Financial Report has been removed to avoid confusion with Financial Reporting which is an institution specific Commission monitoring action.

Section V (E)(2)(g), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies that institutions should notify the Commission of investigations and “open actions” by state or federal authorities, beyond those required in the normal course, related to a school’s licensure, approval to operate, program approval(s), or participation in federal programs (e.g., issuance of a Civil Investigative Demand or subpoena by a state or federal agency).

Section VI (A)(1)(d), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies that “the Commission reviews complaints to assess applicant and accredited schools’ compliance with accrediting standards” and that the Commission “does not mediate on behalf of individuals” and will not intervene in cases of disciplinary action or dismissal or review decisions in such matters as admission, “grades,” graduation, fees, and similar cases. The Commission has also added to this section to say that “a school may need to address such issues in the course of the complaint process in order to demonstrate compliance with accrediting standards.”

Section VI (A)(4)(c), Rules of Process and Procedure

The revision to this section of the *Rules* includes that the Commission will send complaints to the “applicable...federal regulatory agency(ies)”

Section VII (H)(1), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies the Commission’s “stipulation” process stating that a stipulation must be met prior to a Commission action becoming effective. The revisions also replace the term “corrected” with “satisfied” insofar as not every stipulation requires corrective action by a school.

Section VII (J)(1-3), Rules of Process and Procedure

The revisions to this section of the *Rules* includes language moved from *Section (V)(A)* of the *Rules* as it pertains to Reporting as a Commission action and clarifies the purposes of this action as a monitoring function of the Commission’s accrediting process.

Section VII (J)(5), Rules of Process and Procedure

The revision moves the text from *Section V (A)(5)* to *Section VII (J)(5)* of the *Rules* (see above also).

Section VII (K)(1-8), Rules of Process and Procedure

The revisions to this section of the *Rules* are a reorganization, to clarify that the Commission may issue a Warning if it has reason to believe the school is not or may not be in compliance with one or more

accrediting standards and now adds a provision to the allowance that in certain limited circumstances the Commission can delegate the authority to vacate a Warning to the Executive Director “when established conditions have been met by the school.”

Section VII (L)(1&7) Rules of Process and Procedure

The revisions to this section of the *Rules* clarify when the Commission will issue a Probation and includes a provision that a school subject to Probation must within seven days of receipt inform current and prospective students in writing that the school has been placed or “continued” on Probation, “provide a summary of the reasons for the Probation,” and indicate where that action can be obtained from the Commission’s website.

Section VII (M)(1-2), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies that the Commission “will notify a school in writing” when the Commission has found an area in which a school is out of compliance with accreditation standards or requirements. In addition, the revisions clarify and further define the “good cause” provision for extending the maximum timeframe to achieve compliance with an accreditation standard or requirement.

Section VII (P)(5), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies the Commission’s student notification requirements for a school which has had its accreditation withdrawn and now includes a provision that “if the school chooses to appeal a withdrawal of accreditation decision, then the school must inform current and prospective students of the appeal and that the school is on Probation during the appeal process.”

Section VII (P)(6), Rules of Process and Procedure

The revisions to this section of the *Rules* clarifies the Commission’s current practice that when a school closes without:

- a. Completing the education for all enrolled students prior to the closure;
- b. Having an approved teach-out plan (to include a teach-out agreement(s) as may be required) that the school adheres to; or
- c. Having made formal arrangements for all students to complete their education elsewhere through transfer credit, articulation, or as part of a teach-out agreement

the Commission will consider the school to have had its accreditation withdrawn as of the date that the school closes.

Section VII (Q)(4), Rules of Process and Procedure

The revisions to this section of the *Rules* aligns to the revisions described above in *Section VII (P)(6)* of the *Rules*.

Section VIII (C)(4), Rules of Process and Procedure

The revision to this section of the *Rules* replaces the term “taping” with “audio recording.”

Revisions to the ACCSC, Substantive Standards, Standards of Accreditation

Tuition, Cancellation, and Refund Policies
Section I (D)(1-4), Substantive Standards, Standards of Accreditation

Upon review of the comments received in response to the March 7, 2022 Call for Comment, the Commission has revised the *Standards of Accreditation* in the areas of tuition, cancellation, and refund policies meant to better organize this section and to clarify expectations. The 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).
- 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.

Moreover, the section has been reorganized into four distinct categories for clarity. Lastly, the comments received in response to the March 7, 2022 Call for Comment led the Commission to change the word “withdraw” to “cancel” in the new *Section I (D)(2)(a)*.

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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(a).***
 - 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 Tuition discounts offered to prospective students~~ must be ***a*** bona fide ~~(i.e., represent actual reductions in the tuition that would otherwise be charged) and must be fairly applied.~~
 - 2c. A ***grant or scholarship – as distinct from a tuition discount – must:***
 - i. ~~Be is a~~ bona fide financial ~~grant in aid~~ ***assistance whereby funds are applied toward to a*** qualified student ***'s costs;***
 - ii. ~~that is~~ ***Be*** issued for recognized and acceptable purposes; ~~that and~~
 - iii. ~~I~~ ***Include*** specified criteria that a student must meet in order to be eligible for and receive the ***grant or*** scholarship.
 - 3d. 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.

42. 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 Applicant who has*** ~~not visited the school prior to enrollment~~ ~~will have the opportunity to may withdraw~~ ~~cancel~~ 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.

53. 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, loan documents, etc.);***
- ~~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.** [As stated above, this language was moved to *Section V (B)(8) of the Rules of Process and Procedure.*]

Emergency Preparedness
Section I (G)(3), Substantive Standards

The Commission has made a technical and conforming amendment to *Section I (G)(3), Substantive Standards* to remove the requirement that a school’s emergency preparedness plan be included as part of a school’s institutional assessment and improvement planning activities. Based on feedback received from evaluation teams, the Commission determined this added provision to be redundant and unnecessary.

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CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION I – OWNERSHIP, MANAGEMENT, AND ADMINISTRATION

G. Physical Facilities and Emergency Preparedness

3. The school has a written emergency preparedness plan that ~~is part of the school’s institutional assessment and improvement planning activities~~, is made available to all staff, faculty, and students, and includes the following elements:

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

The revisions to the *Standards of Accreditation* below are designed to re-conceptualize program evaluation standards in a manner that gives institutions greater flexibility while also promoting student and alumni participation in assessing program effectiveness. These revisions are part of ACCSC’s *Students First* initiative that seeks, among other things, to place students in a more prominent and intentional role in the accreditation assessment paradigm.

The Commission sent proposed revisions to these standards in the March 7, 2022 Call for Comment and found that generally the commenters were in support of the proposed revisions. However, based on the comments received the Commission has sought to clarify the new requirements as highlighted below:

- In the new language, the Commission revised the proposed language now stating that the program evaluation process should include student and alumni input collected through “sources such as…” to clarify that the sources listed are meant as illustrative examples.
- To clarify further, the revised standards do not require schools to have students and alumni serve on a Program Advisory Committee but rather that student and alumni input is to be collected through sources **such as** regular surveys, student governance groups, inclusion on Program Advisory Committees, community building initiatives, or other formal and informal means.
- The Commission has a longstanding requirement for a “diverse” Program Advisory Committee; however, a commenter noted this word to be vague. As a means to provide some guidance, the Commission is encouraging institutions as a best practice to include an array of participants on Program Advisory Committees – not just representatives of the employment committee – as a means to build broader relationships in the community and to bring potentially fresh perspectives as to the needs of the community which the school serves. Examples of such participants include:
 - Students and alumni;
 - Community leaders from organizations such as a local chamber of commerce, charities, social services, physical and mental health services, etc.;
 - Guidance counselors or vocational education teachers from local high schools;
 - Public library professionals; and

- Local political leaders.
- The Commission revised the proposed requirement for evidence of consideration of input to clarify that it should come from whichever sources are included as part of the school’s program evaluation process.
- Based on the comments received, the Commission removed the phrase that it is “preferable” for Program Advisory Committee meetings to be held on-site.

While it may appear that the revisions are legion, that is not really the case from a substantive point of view. Much of the previous language has been moved or realigned to streamline the standards. The Commission, however, points to the following key components as the prominent elements of the revisions:

- Conceptually, the revisions consolidate program evaluation into one section – *Section II (A)(4), 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 – Program Requirements*.
- Student, Alumni, and other useful external sources, have been added to the resources expected to be part of a school’s program evaluation process.
- By requiring the program evaluation process to be inclusive of a wide 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. Specifically, if the Program Advisory Committee meeting is not held at the physical campus of the school, then the school must provide the Program Advisory Committee with a sufficiently detailed description and virtual tour of the equipment and facilities representing current conditions at the school. Examples of documentation expectations include elements such as:
 - A digital copy of the virtual tour and proof that the Program Advisory Committee received the tour. The virtual tour should demonstrate that it:
 - Showed all of the equipment and facilities for the applicable program area and
 - Was conducted at the time of the meeting or recently before the Program Advisory Committee representing the current conditions of the school;
 - A copy of the detailed description provided to the Program Advisory Committee with regard to tools, equipment, and resources; and
 - The Program Advisory Committee’s discussion of the virtual tour as recorded in meeting minutes.

The revisions to *Section II (A)(4), Substantive Standards* are included below. *Section II (A)(6), Substantive Standards* has been deleted in its entirety and the remainder of the section has been renumbered. A new section has been added to *Appendix III* entitled “*Program Advisory Committee*” and is reprinted here in its entirety.

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CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION II – PROGRAM REQUIREMENTS

A. General Requirements

4. Program Evaluation

- 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. Evaluate curriculum and course content (– i.e., academic general education, applied general education, technical and occupational courses, electives, etc.);**
 - ii. Assess the appropriateness of that coursework in relation to program objectives;**
 - iii. Assess the adequacy of program equipment and supporting resource materials;**
 - iv. Assess student achievement outcomes and program viability; and**
 - v. Make 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 the specific requirements for Program Advisory Committees);**
 - ii. Student and alumni input collected through sources such as: 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;**
 - 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 received from the sources which are a part of its program evaluation process.**³
- 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).

²Examples 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.

³Evidence 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.

~~6. Program Advisory Committee~~

This *Section* deleted in its entirety – significant portions moved to *Appendix III*. See below.

Sections 7-11 renumbered to 6-10.

Appendix III – Program Requirements~~*Definition of a Credit Hour*~~

Program Evaluation – Program Advisory Committees

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. 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 one regularly scheduled Program Advisory Committee meeting annually 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.*
 - d. 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 and virtual tour of the equipment and facilities representing current conditions at the school.*
 - e. In addition to the requirements above:*

- i. For each master's degree program/program area, the Program Advisory Committee must also include 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 (see also Section IX (D)(6), Substantive Standards, Standards of Accreditation).*
- 3. The school must provide evidence that it gives consideration to Program Advisory Committee input. 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 review of a school's learning resources, facilities, and equipment must be fulfilled for each individual campus. For example, a school may use a non-local Program Advisory Committee to review the program curriculum offered across a system of affiliated schools and use a local Program Advisory Committee for the campus-level review of the school's learning resources, facilities, equipment, and outcomes.*

Licensure Rate Disclosure

Section IV (C)(3), Substantive Standards, Standards of Accreditation

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 ACCSC Annual Report, the *Standards* previously did not require schools to disclose those rates to students. Schools are 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*) and the Commission believes adding the disclosure of all required outcomes is in alignment with the expectations for disclosures provided to prospective students.

The Commission took into account the comments submitted in response to the March 7, 2022 Call for Comment, which were generally in support of the proposed revisions. The Commission requires schools to provide licensure/certification exam pass rates in the Annual Report for those programs where passing the exam is required by a governmental entity to work in a particular field. Accordingly, the revision to the standard below only requires licensure/certification exam pass rate disclosure for those "applicable" programs. Also based on a review of the comments, the Commission will allow up to 30 days after the due date of the Annual Report for schools to publish licensure/certification exam pass rate disclosures.

Accordingly, the Commission has revised *Section IV (C)(3), Substantive Standards* as follows below.

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 *rate*, ~~and~~ graduate employment rate, *and as applicable licensure/certification examination pass rate* for each program offered as last reported to the Commission. The disclosure for each program's graduation *rate*, ~~and~~ graduate employment rate, *and licensure/certification examination pass rate* must be accurate, not intended to mislead, and includes the program population base and time frame upon which each rate is based.

Accreditation Fee Protocol

Appendix I – Accreditation Fees, Substantive Standards, Standards of Accreditation

The Commission has established a protocol for charging additional fees in those instances where a report or application submitted by a school is incomplete and additional processing time and effort is required. The conforming amendment to *Appendix I – Accreditation Fees* and the Protocol are set forth below.

Appendix I – Accreditation Fees

~~Special~~**Other Circumstances:**

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

Additional Fee Protocol:⁴

- For substantive change applications (with the exception of the Application for a Change of Control-Part I): Upon a second request and each subsequent request for additional information, the school will be assessed a \$150 fee payable upon submission of the additional information.
- For an Application for a Change of Control-Part I: Upon a second request and each subsequent request for additional information, the school will be assessed a \$500 fee, payable upon submission of the additional information.
- For an Application for Renewal of Accreditation: Upon deferral of the application, the school will be assessed a \$250 fee payable upon submission of the response to the deferral.

⁴ Not published in the *Standards of Accreditation*.

Interpretative Guidance Utilization of Online Learning Tools and Approval of Distance Education

Approval of Distance Education

If a school received a temporary approval from the Commission to offer a distance education courses/program in 2020, as a reminder those temporary approvals have expired. A school must have received approval from the Commission to offer a distance education courses/program in all cases.

Initial Distance Education On-Site Evaluation and Notification of Initial Distance Education Start Date Guidance

Institutions are reminded that any school which received initial distance education approval by the Commission is required to receive an on-site evaluation to review each distance education program (*Section IV (E)(6)(b), Rules of Process and Procedure, Standards of Accreditation*).

As stated in the revisions to the *Rules* above, if a school does not enroll and start students in a newly approved distance education modality within 24 months of the initial distance education approval date, the new distance education modality will cease to be approved. Given the significant volume of distance education applications approved since January 1, 2021 and in order to determine which institutions have actually enrolled students in the distance education programs approved by the Commission since then, the Commission requests that each institution that was approved for initial distance education between July 1, 2020 through June 30, 2022 and plans to continue to offer regular and ongoing distance education program(s) to submit a [Notification of Initial Distance Education Start Date](#) form.

The [Notification of Initial Distance Education Start Date](#) form must be completed and submitted electronically to ACCSC's College 360 Database no later than August 15, 2022.

The Commission may cease approval of distance education for any institution that is not offering regular and ongoing distance education and does not have enrollments in the approved distance education programs within 24 months of the initial program or distance educational approval date.

Additional Guidance for Utilizing Online Learning as a Student Support Tool:

The Commission issued guidance on December 1, 2020 regarding the utilization of online learning tools in programs that are not approved for distance education. Subsequent to issuing this guidance the Commission received several inquiries seeking further clarifications. Accordingly, if a school chooses to establish policies that allow students who are subject to circumstances that limit their ability to “attend” classes or participate in otherwise required in-person coursework for a limited period to be able to continue their enrollment using online learning supplemental resources, those policies should include the following types of components:

- The circumstances that would warrant such an accommodation for students – for example a student quarantining for a limited period of time or a student recovering from an accident;
- The limits of the accommodation regarding time and qualifying course types – for example up to three weeks and only for the lecture/didactic portions of courses;
- The resources the student would need in order to take advantage of the accommodation – for example access to a computer, webcam, and the internet or the ability to receive and access recorded classroom lectures;
- Any requirements for access to learning materials – for example, the student's ability to use the school's learning resource system remotely as required to complete assignments; and

- Any requirements and allowances for make-up work in cases where accommodations could not be made – for example, requirements to attend a hands-on practical lab make-up section outside of the normal course schedule.

These guidelines offer but a few examples; however, there are several other scenarios and circumstances that could qualify for such accommodations which would not require distance education approval from ACCSC. The Commission does not require notification or approval of the above types of learning accommodations but expects that in making such accommodations, a school:

- Establishes appropriate policies and practices conforming to the spirit and intent of the guidelines issued;
- Ensures that the school maintains compliance with state and federal regulations as it pertains to offering remote learning as a short-term student support tool;
- Publishes its policies to provide temporary accommodation in its catalog and sets forth clear guidelines and expectations for students;
- Ensures that required and intended learning objectives are achieved despite the temporary use of remote instruction;
- Limits the accommodation in duration, application, and in scope to only those students whose circumstances qualify; and
- Ensures that such practices are not used to replace entirely the approved delivery method of a program.

Frequently Asked Questions and Scenarios

Q: My school was approved for Initial Distance Education during the pandemic, and we offered distance education solely due to the pandemic. Now that our students are back on campus, we no longer offer distance education and do not plan to offer distance education in the future. How should our school proceed?

A: Since your school no longer plans to offer distance education, you will need to notify the Commission via letter and upload to College360 that you wish to discontinue all distance education offerings. The Commission will then cease to approve the distance education at your school and will not expect the school to report on distance education activities in the Annual Report or to comply with distance education standards. If your school would like to offer permanent and ongoing online education in the future, the school will be required to submit an Application for Initial Distance Education.

Q: My school was approved for Initial Distance Education during the pandemic and we offered distance education solely due to the pandemic. Now that our students are back in school, we no longer offer distance education on an ongoing basis and would only like to offer distance education options as needed in cases where COVID rates increase, a student is injured or ill, or there is inclement weather, for example. How should we proceed?

A: Since the school does not plan to offer distance education on an ongoing basis as approved by the Commission and plans to only offer distance education as needed and as determined by the school on a case-by-case basis, it appears that the school is offering distance education as a student support tool to accommodate those students in rare and extenuating circumstances. Therefore, the school should notify the Commission via letter and upload to College360 that you wish to discontinue all distance education offerings and provide the school's plan to only offer distance education as a support tool and resource that allows students to continue their education online for a short duration of time and acknowledging that the students are required to return to on-campus classes after the short duration of online class time. The Commission will cease approval of the school's distance education and will not expect the school to report on distance education activities in the Annual Report or to comply with distance education standards.

- Q: A tornado has damaged the school and the facility will not be ready to resume in-person training for four weeks while repairs are underway. The faculty are able and prepared to provide lectures via an online virtual meeting platform (e.g., Zoom, Webex, etc.) which students will attend synchronously. The students all have school-issued laptops and have access to Wi-Fi either at home or using publicly available hotspots at our community library. The school does not have approval to offer distance education for any of its programs. Do we need to apply for initial approval of distance education in order to continue providing training to the students while the repairs to the school are underway?
- A: No. This scenario describes well the kinds of “limited” circumstances for which the Commission intends to support without requiring onerous reporting or approval requirements. In this scenario, we know the cause, the expected time frame and the fact that it is limited, and the availability of resources for both the school and the students.
- Q: My school was approved for Initial Distance Education many years before the pandemic and applied to offer all remaining programs via the Application for Expansion for Distance Education during the pandemic. My school plans to continue to offer distance education programs as approved by the Commission. Are there any additional steps that my school is required to take?
- A: No additional steps are required. The school is approved to offer distance education and likely already received an on-site to review the school’s initial distance education since the school has been approved to offer distance education well before the pandemic.
- Q: My school was approved for Initial Distance Education during the pandemic and plans to continue to offer distance education. Are there any additional steps that my school is required to take?
- A: Please submit the Initial Distance Education Notification of Start Date form as directed in the guidance above. The school will receive an on-site evaluation to review each distance education program, as required.
- Q: Our school has a student who will not be able to attend classes and practical labs for a significant period of time. Although our school would be willing to set up a camera to record in-class lectures, the student will not have access to the resources required to view those recordings. In addition, there are several required hands-on lab assignments that the student will miss. Can our school keep this student active since the school is willing to record the in-class lectures?
- A: Based on this scenario, it would seem that the better course of action for this student is either an approved Leave of Absence or an Independent Study option insofar as the student will not be able to participate in the online learning platform and will miss several crucial assignments.
- Q: My school does not offer permanent and ongoing distance education and is not approved for distance education. My school however would like to be permitted to offer distance education courses on an as-needed basis to students in extenuating circumstances. Some of these circumstances may involve a student being required to complete class time online for at least a month (likely more) and may include one or more online courses. Is this permitted?
- A: This is permitted but only with distance education approval as the Commission would view offering online class time for one or more months or for a full course to require permanent approval of the school’s distance education modality. Offering one entire course or more via distance education is not considered short-term distance education and again would not fall under the category of offering online learning as a student support tool to temporarily mitigate extenuating circumstances.