To: ACCSC-Accredited Institutions and Other Interested Parties

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

Date: March 22, 2023 Subject: Call for Comment

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

- > Branch Realignment Process Section IV (E)(5)(a)(xii), Rules of Process and Procedure, Standards of Accreditation
- ➤ Institutional Name Section I (F)(2), Substantive Standards, Standards of Accreditation
- Externship Length Section II (A)(7)(e), Substantive Standards, Standards of Accreditation
- ➤ Baccalaureate Degree Completion Program Requirements Section II (C)(3)(e), Substantive Standards, Standards of Accreditation
- > Student Safety Standards Section VI, Statement of Purpose & Section VI (A) Substantive Standards, Standards of Accreditation
- > Student Assessment Section VII (A)(2), Substantive Standards, Standards of Accreditation
- > Probation and Termination Section VII (A)(3), Substantive Standards, Standards of Accreditation
- > Student Achievement Reorganization Section VII (B), Substantive Standards, Standards of Accreditation
- > Fees Appendix I, Substantive Standards, Standards of Accreditation
  - Initial Applicant Waiver Fee
  - Application for Change of Control
  - o Application for Appeal of a Commission Decision
- > Guidelines for Employment Classification Appendix VII, Substantive Standards, Standards of Accreditation
- Advertising Appendix IV, Substantive Standards, Standards of Accreditation
- Catalog Checklist
- > Enrollment Agreement Checklist

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The Commission welcomes and encourages the comments of ACCSC-accredited institutions and other interested parties on the topics listed above. The Commission encourages all member institutions and interested parties to read carefully the Commission's request for feedback and to submit comments and recommendations for consideration by the Commission. The Commission will give careful consideration to the comments received, particularly those that reflect thoughtful insights which take into account what is best for the entire ACCSC membership and support and enhance ACCSC's mission.

With regard to proposed revisions, after considering the written comments, the Commission may adopt the revision as proposed, adopt the revision with additional changes, defer action for further study and consideration, or reject the proposed revision. If the Commission adopts the revision, ACCSC will establish an effective date allowing reasonable time for institutions to come into compliance and will announce the revision via an *Accreditation Alert*.

Written comments regarding the topics included in this *Call for Comment* are to be in the form of a PDF document on letterhead with the signature of the commenter and are due by <u>April 20, 2023</u>. Please send all written comments to the attention of Michale S. McComis, Ed.D., Executive Director, via e-mail to mccomis@accsc.org.

For assistance or additional information regarding this *Call for Comment*, please contact Michale S. McComis, Ed.D., Executive Director, at 703.247.4520 or <a href="maccomis@accsc.org">mccomis@accsc.org</a>.

# Branch Realignment Process Section IV (E)(5)(a)(xii), Rules of Process and Procedure, Standards of Accreditation

Currently, a main school may submit an Application for a Branch Realignment-Part I and an Application for a Branch Realignment-Part II to realign one or more branch campuses under a main campus. This process, however, is not specifically addressed in the *Rules of Process and Procedure*, *Standards of Accreditation*, including the need to file the Application for a Branch Realignment-Part I and an Application for a Branch Realignment-Part II. Therefore, the Commission recommends the following proposed additions to the *Rules of Process and Procedure* section of the *Standards of Accreditation*.

Proposed new language in *red*, *bold*, *and italic text* and proposed deleted language in <del>blue strikethrough</del> text.

#### CHAPTER 1 – RULES OF PROCESS AND PROCEDURES

# SECTION IV – NON-SUBSTANTIVE & SUBSTANTIVE CHANGE NOTIFICATION & APPLICATION REQUIREMENTS

## E. Substantive Change Application Requirements

- 5. Separate Facilities
  - a. Branch Campus
    - xii. Realignment of a Branch Campus(es): An accredited main school seeking to realign one or more currently approved branch campuses under that accredited main school must submit an Application for a Branch Realignment-Part I and an Application for a Branch Realignment-Part II with all required and supporting documentation. Approval of the realigned branch campus(es) within the scope of the accreditation of a main school will be granted only after all required information is submitted and the main school under which the branches are realigning with has appropriately demonstrated its ability to manage the branch campuses in compliance with accrediting standards. Any branch campus may not be realigned more than once in a 24 month period.
  - xii.xiii. Publication: Branch campuses are listed separately in Commission publications of accredited schools.
  - xiii. xiiii. Sustaining Fees: Dues for a branch campus are computed separately and on the same basis as for a main school.

# Institutional Name Section I (F)(2), Substantive Standards, Standards of Accreditation

Currently, in reference to the use of the term "University" in a school's name, Section I(F)(2), Substantive Standards, Standards of Accreditation states:

- 2. A school may use the term "University" in its name only when such use has been approved by the appropriate state authorities and upon approval by the Commission after the following elements have been demonstrated:
  - a. The school offers at least one graduate-level degree;
  - b. The school offers diverse schools of study with a comprehensive learning resource system to support those fields;
  - c. The school is comparable to other schools with university status; and
  - d. The school has an established professoriate with a commitment to scholarship.

In the past, the Commission has received requests from schools to use the term "University" in conjunction with or shortly after receiving approval for the school's first graduate-level degree program. While the standard as currently written only requires that a school "offers at least one graduate-level degree," the intent of the standard is not to be a perfunctory checklist, but rather to ensure that a school not only has approval of a at least one graduate degree, but also has implemented the program at the school and demonstrated success in offering graduate level degrees.

To align with the intent of the standards, the Commission is recommending the following proposed revisions to the *Standards of Accreditation*.

Proposed new language in *red*, *bold*, *and italic text* and proposed deleted language in <del>blue strikethrough text</del>.

### **CHAPTER 2 – SUBSTANTIVE STANDARDS**

## SECTION I – OWNERSHIP, MANAGEMENT, AND ADMINISTRATION

### F. Institutional Name

- 2. A school may use the term "University" in its name only when such use has been approved by the appropriate state authorities and upon approval by the Commission after the following elements have been demonstrated:
  - a. The school offers at least one graduate-level degree and can show successful student achievement in the offering of the graduate degree(s), with the exception of branch campuses pursuant to Section IV (E)(5)(a)(ii), Rules of Process and Procedure, Standards of Accreditation [the highlighted language may be included as a footnote];
  - b. The school offers diverse schools *programs* of study with a comprehensive learning resource system to support those fields;
  - c. The school is comparable to other schools with university status; and
  - d. The school has an established professoriate with a commitment to scholarship.

# Externship Length Standard: Section II (A)(7)(e), Substantive Standards, Standards of Accreditation

Currently, all externships greater than one-third of the program length are put forward for Commission consideration and approval; however, the majority of program applications where an externship is greater than one third of the program is due to some other industry regulatory requirement. Some programs are required by a licensing board or programmatic accreditor to include externships greater than one-third the program length in order to master the skills in the subject area. The below proposed revisions are intended to address programmatic accreditor requirements for programs such as Surgical Technology, for example, that must include a specific number of patient-centered procedures and competencies to be completed by the student at the externship site. The prescribed competencies and estimated hours of completion ensures student eligibility to complete the required certification examinations.

Therefore, in order to allow for alignment with industry and programmatic accreditor requirements, the Commission proposes the following revisions to the Standards of Accreditation.

Proposed new language in red, bold, and italic text.

## CHAPTER 2 – SUBSTANTIVE STANDARDS SECTION II – PROGRAM REQUIREMENTS

## A. General Program Requirements

### 7. Externships

e. Schools are expected to maintain an appropriate balance among didactic, supervised laboratory, outside work/preparation, and externship activities as applicable within the program, as evidenced by the course outline. Any externship that is greater than one-third of the total length of the program requires review and approval by the Commission, with the exception of cases where the length of the externship is due to the requirements of another accrediting or certification agency. In such instances, schools must provide evidence of these requirements to the Commission.

## Baccalaureate Degree Completion Program Requirements Section II (C)(3)(e), Substantive Standards, Standards of Accreditation

The Standard regarding a baccalaureate degree completion program, Section II (C)(3)(e), Substantive Standards, Standards of Accreditation, has caused some confusion with regard to the intent of the standard and when it best applies in offering undergraduate education. To mitigate confusion of the standard and the requirements for baccalaureate degree completion programs, the Commission proposes to eliminate Section II (C)(3)(e), Substantive Standards, Standards of Accreditation.

The intent of the baccalaureate degree completion program option has been to offer schools the flexibility to create a baccalaureate degree program where only the upper-level coursework is provided. This flexibility, however, does require a student to have already completed an associate degree in a related area of study and to transfer a full associate degree program into the baccalaureate degree completion program, which can actually be limiting. The student then is required to complete 60 semester hours or 90 quarter hours of upper-level coursework to earn the baccalaureate degree. While the Commission receives a small number of applications for baccalaureate degree completion programs each year, schools that apply for completion programs often misunderstand the intent and the requirements. Therefore, Commission spends extensive time providing additional detailed guidance to assist schools in understanding the baccalaureate degree completion program requirements and schools must submit additional information which requires review time.

The Commission believes that the intent of the baccalaureate degree completion program option can still be met through the application of the current *Standards of Accreditation* covering transfer of credit, admissions policies, and articulation agreements. Schools have the option to allow associate degrees and degree level courses to transfer into baccalaureate degrees making the need for a stand-alone set of requirements unnecessary and confusing.

For example, through a school's transfer of credit policy, a student that has completed a related associate degree or related degree level coursework/credits can transfer the associate degree or degree level credits into a baccalaureate degree program. In addition, as part of the admissions policy, schools would require a student to have a related associate degree or related degree level credits prior to admissions into the baccalaureate degree program. This option eliminates the need for a baccalaureate degree completion program distinction and encourages schools to utilize appropriate transfer of credit and admissions policies to allow students to transfer previously earned prior degree-level credits/credentials into a baccalaureate degree. Note that such elimination of the *Standard* will not impact schools that currently offer a baccalaureate degree completion program as the Commission has the option to grandfather those schools and applicable program in so that those schools can continue to offer a completion program.

To align with the intent of the standards, the Commission is proposing the following potential revision to eliminating the baccalaureate degree completion program standard.

Proposed deleted language in blue strikethrough text.

## CHAPTER 2 – SUBSTANTIVE STANDARDS SECTION II – PROGRAM REQUIREMENTS

## C. Degree Programs

- 3. Baccalaureate Degrees
  - e. A school may offer a baccalaureate degree completion program where only upper level courses (i.e., 300 and 400 level) are required. A baccalaureate degree completion program must be comprised of a minimum of 60 semester hours or 90 quarter hours of upper level

coursework. In order to have a baccalaureate degree completion program approved, the school must require a student to have an earned associate, or higher level, degree from an accredited postsecondary educational institution that is related to the educational program objectives of the baccalaureate degree completion program and that the school considers appropriate to prepare students for matriculation into the upper level courses. Additionally, the school must maintain compliance with the general education and technical education requirements under Section II (A) & (C), Substantive Standards, Standards of Accreditation. Advertising of this type of degree program must make clear that it is a baccalaureate degree completion program.

### **Student Safety Standards**

## Section VI, Statement of Purpose & Section VI (A) Substantive Standards, Standards of Accreditation

During the review of student complaints/feedback, the Commission has noted some instances of students feeling unsafe due to the conduct of other students; faculty conduct and treatment of students; and other scenarios where students have felt uncomfortable about attending school. While these instances do not appear to be pervasive but largely isolated to a set of circumstances, the Commission nonetheless believes that providing a safe environment for students to engage in the learning process is paramount.

Currently, the standards address safety in the following areas:

- Physical facilities (Section I(G)(2), Substantive Standards, Standards, of Accreditation);
- Instructional materials (e.g., proper safety devices and safety equipment in Section II (A)(5)(c-d), Substantive Standards, Standards of Accreditation);
- Written emergency preparedness plan (Section I (G)(3), Substantive Standards, Standards of Accreditation); and
- Pilot Projects (Section XI (B)(3)(e), Rules of Process and Procedure, Standards of Accreditation).

There is not, however, a standard that explicitly states that a school must take into account student safety and well-being as part of its general services for students. The Commission is interested in receiving feedback from schools in the Call for Comment process as to school's currently achieve these goals and the proposal included here. To allow ACCSC better assessment opportunities regarding factors related to student safety, health, and overall well-being while in school, the Commission proposes the following revisions to the *Standards of Accreditation*.

Proposed new language in *red*, *bold*, *and italic text*.

#### **CHAPTER 2 – SUBSTANTIVE STANDARDS**

#### SECTION VI – STUDENT SERVICES

#### STATEMENT OF PURPOSE

The purpose of this section is to describe the fundamentals of assessing and addressing students' educational and other needs *and ensuring an appropriate and safe learning environment*. Basic elements include mechanisms for ongoing attentiveness to student needs and directing appropriate resources to address those needs. Resources include support for students' academic and nonacademic needs; employment assistance; and the availability and secure maintenance of student records.

## A. Advising and Counseling

- 3. The school maintains a student services program that takes into account the number of programs, and size and mix of the student body and that responds to individual student needs.
  - a. The student services program must be coordinated by an individual with appropriate professional and educational qualifications.
  - b. The student services program must minimally encompass relevant coping skills (e.g., life, career development, budget, and personal financial planning skills); general development appropriate to higher education students; student retention strategies suited to the school's programs; academic advising; testing and tutoring services; supervision and monitoring of attendance records and leaves of absence; graduate employment assistance; *student health*, *safety, and well-being*; and information concerning housing, transportation, and child care;

## Student Assessment Section VII (A)(2), Substantive Standards, Standards of Accreditation

Currently, the Commission's *Standards* only speak to "authentication" policies and process in a distance education course or program as follows in *Section IX* (B)(4), *Substantive Standards, Standards of Accreditation*:

- 4. The school establishes authentication policies and processes regarding student verification in a distance education course or program as follows:
  - a. The school uses effective practices to verify that the student who registers in a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit (e.g., a secure login and/or pass code, proctored examinations, student identity technologies, etc.).
  - b. The school establishes processes that protect student privacy and notifies students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.

The Commission's student assessment standards, however, do not address that – as a best practice – schools should establish best policies and procedures to ensure academic integrity as a means to prevent student cheating. Anecdotally, there has been an uptick in the number of institutions discovering student cheating in the school's assessment practices or in third-party certification examinations. Accordingly, the Commission proposes the following revision to the *Standards of Accreditation* in this area.

Proposed new language in *red*, *bold*, *and italic text* and moved language in either *green*, *bold*, *and italic text* or green strikethrough text.

## **CHAPTER 2 – SUBSTANTIVE STANDARDS**

## SECTION VII – STUDENT LEARNING, ASSESSMENT, PROGRESS AND ACHIEVEMENT

## A. Student Learning, Assessment, and Satisfactory Progress

- 2. Student Assessment
  - c. The school establishes criteria to assess a student's academic progress through the program. At a minimum, the school reports academic progress to students at regular intervals (e.g., phase, module, mid term, term, quarter, semester, etc.) and evaluates the minimum grade point average that students must attain at those intervals.
  - d. The school promotes academic integrity and has policies and controls to discourage academic dishonesty (i.e., cheating, plagiarism, etc.) and clearly communicates the consequences of such behavior. The school may utilize its own methods to prevent, detect, document, and take appropriate action in instances of academic dishonesty.
  - e. At a minimum, the school reports academic progress to students at regular intervals (e.g., phase, module, mid-term, term, quarter, semester, etc.) and evaluates the minimum grade point average that students must attain at those intervals.
  - **df**. The school provides students with learning outcomes for each course and publishes in its catalog a written policy for assessing satisfactory student progress through the program. The school measures grades, projects, portfolios, externships, or other assessments against stated educational objectives that the school explains clearly to students. This policy must address performance standards and grading and be applied consistently.

## Probation and Termination Section VII (A)(3), Substantive Standards, Standards of Accreditation

ACCSC's standards regarding probation and termination, Section VII (A)(3)(e) Substantive Standards, Standards of Accreditation, are located specifically under the section for Student Satisfactory Progress. However, academic progress is not the only reason a student may be placed on probation or be subject to termination. Thus, the Commission proposes a more discrete delineation in the standards for probation and termination.

Specifically, probation and termination policies and procedures apply to circumstances beyond just student satisfactory academic progress such as attendance policy and code of conduct violations. Additionally, probation and termination standards require, at times, specific notification and warning procedures. As such, these areas likely bear sufficient importance and distinction to be located under a discrete heading.

As currently written, the probation and termination standards require the school to have probation and termination *policies*. However, detailed procedures are only required for warning students who are in jeopardy of being terminated due to unsatisfactory attendance or grades. In practice, students may also be terminated for code of conduct violations or other reasons. The below proposed revisions are intended to create a requirement for probation and termination procedures to guard against discriminatory and/or arbitrary and inconsistent probation and termination actions and to help ensure that schools create clear procedures and expectations for students. The Commission noted that in review of complaints, the lack of procedural requirements around probation and termination policies has led to some inconsistent termination actions for students. The proposed revisions are not intended to preclude schools from immediately terminating students when circumstances warrant such action, simply to ensure the school has established steps for such an action. Therefore, the Commission proposes the following revisions to the *Standards of Accreditation*.

Proposed new language in *red*, *bold*, *and italic text*, proposed deleted language in <del>blue strikethrough text</del>, and moved language in either *green*, *bold*, *and italic text* or <del>green strikethrough text</del>.

### **CHAPTER 2 – SUBSTANTIVE STANDARDS**

#### SECTION VII – STUDENT LEARNING, ASSESSMENT, PROGRESS, AND ACHIEVEMENT

## A. Student Learning, Assessment, and Satisfactory Progress

- 3. Student Satisfactory Progress
  - e. The school has probation and termination policies that are defined and published in its catalog. These policies must include specific warning procedures to notify the student in writing that continued unsatisfactory academic progress or a failure to meet attendance requirements will result in termination. The school shows that the student receives the notification or in the case of absenteeism that the school made an attempt to notify the student that continued failure to attend classes will result in termination. The school maintains documentation of the notification and the terms of the probation or termination in the student's file.
  - f. The school terminates any student who does not satisfactorily acquire the minimum knowledge, skills, and competencies required by the program objectives based on the school's assessment criteria and satisfactory progress policy. The school publishes its policies and procedures for a student to request reinstatement after being terminated.
  - **ge**. The school publishes policies that define the effect of course incompletion, course withdrawal, course repetitions, and, if offered, policies that define the requirements for non-credit remedial courses.

- hf. A student may only earn credits when, based on the school's assessment methods, the student has demonstrated that the required educational objectives have been met at an acceptable level. Successful program completion is based upon satisfactory achievement of the knowledge, skills, and competencies required by the program objectives and is confirmed by an appropriate credential (e.g., certificate, diploma, degree).
- **ig**. The credential document identifies the school's name, location, program of study, and date of graduation in an accurate manner.

## 4. Probation and Termination Policies

- a. The school must have has probation and termination policies and procedures that it follows and that are defined and published in its catalog to:
  - i. These policies must include specific warning procedures to nNotify and warn the student in writing that continued unsatisfactory academic progress; or a failure to meet attendance requirements; or failure to adhere to the school's conduct policies will result in termination.
  - ii. The school shows Ensure that the student receiveds the notification or in the case of absenteeism show that the school made an attempt to notify the student that continued failure to attend classes will result in termination.
  - iii. The school mMaintains documentation of the notification and the terms of the probation or termination in the student's file.
- b. The school terminates any student who does not satisfactorily acquire the minimum knowledge, skills, and competencies required by the program objectives based on the school's assessment criteria and satisfactory progress policy. The school publishes its policies and procedures for a student to request reinstatement after being terminated.

## Student Achievement Standards Reorganization Section VII (B), Substantive Standards, Standards of Accreditation

In an effort to streamline the Student Achievement section of the *Substantive Standards*, the Commission considered reorganizing this section. The Commission does not believe that the recommendations below result in a substantive change of the *Standards of Accreditation*. Instead, it is the Commission's intent to reorganize and reorder the substantive requirements of the *Student Achievement* section and to move the language that deals with "monitoring" and "Reporting" to the *Rules of Process and Procedure* section of the *Standards of Accreditation* where these requirements are already addressed.

A primary reason to move the monitoring and Reporting language to the *Rules* section is to help ensure consistency in the language and the Commission's requirements – to that end it does not help to have monitoring and Reporting requirements in two different areas. Please note, however, that the language marked below to be moved to the *Rules* will be cross-referenced with the existing language in the *Rules* and any duplicated language will be discarded.

## **Revisions to the Standards of Accreditation:**

New Language/Codification in *red*, *bold*, *and italicized text*.

Deleted language in blue strikethrough text.

Moved language in green, bold, and italicized text and green strikethrough text.

Language to be moved to the Rules of Process and Procedure in orange strikethrough text.

Editorial comments in [gold, bold, and bracketed text].

## **CHAPTER 2 – SUBSTANTIVE STANDARDS**

## SECTION VII - STUDENT LEARNING, ASSESSMENT, PROGRESS, AND ACHIEVEMENT

#### **B.** Student Achievement

- 1. The school assesses educational quality, institutional effectiveness, and student achievement taking into account the rates at which students graduate from each training program, attain employment in a training related field, and pass licensure/certification exams required for employment, as well as other factors that are reasonably related to student achievement.
- 2. The school demonstrates successful student achievement by:
  - a. dDocumenting through its assessment practices that students are acquiring the knowledge, skills, and competencies intended by the program objectives- and
  - b. The school demonstrates successful student achievement by mMaintaining acceptable rates of student graduation and employment in the career field for which the school provided education as well as acceptable pass rates on licensure/certification exams where required by governmental entities to work in a particular career field, except as provided in (4.) below.
- 3. The school supports student achievement rates through student transcripts, the school's verifiable records and documentation of initial employment of its graduates, and exam pass rate data obtained from the requiring entity.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> See Appendix VI for the Commission's current established benchmark rates for acceptable student achievement. See the Rules of Process and Procedure for reporting and monitoring in instances where a school reports rates that are below the Commission's established benchmark rates.

<sup>&</sup>lt;sup>2</sup> See *Appendix VII* for the Commission's Guidelines for Employment Classification.

- 4. For any program that has a graduation, employment, or licensure/certification exam pass rate that is lower than the Commission's established benchmark rates, a school may still demonstrate with supporting documentation the successful achievement of its students in that program by providing other reliable indicators of successful student learning and by showing that factors such as economic conditions, state and national trends, location, student population served, length of program, students who withdraw from training but still obtain employment, state requirements, or other external or mitigating factors reasonably related to student achievement are adversely impacting the school's ability to meet the Commission's established benchmark rates. [Moved from (iv.) below]
  - i. The Commission will review student achievement for each program offered at an institution and will consider not only the rates at which students graduate from a training program, attain employment in a training related field, and pass licensure/certification exams required for employment, but also other factors that are reasonably related to student achievement as a measure of educational quality and institutional effectiveness. [Moved to (1.) above]
  - ii. The Commission establishes and publishes the benchmark graduation and employment rates from information submitted in the Annual Reports of accredited schools. The Graduation and Employment Chart is the Commission's mechanism for collecting student achievement data and schools must provide this information in accordance with the prescribed requirements and instructions that accompany this chart. A school demonstrates an acceptable level of successful student achievement when graduation and employment rates meet or exceed the established benchmarks.
- 5iii. For those programs where a governmental entity requires the attainment of a passing score on a licensure/certification exam in order to work in a particular field, the Commission determines a program's licensure/certification exam pass rate to be acceptable when at least 70% of the students that take the exam attain a passing score.<sup>3</sup>
  - iv. For any program that has a graduation, employment, or licensure/certification exam pass rate that is lower than the Commission's established benchmark rates, a school may still demonstrate with supporting documentation the successful achievement of its students in that program by providing other reliable indicators of successful student learning and by showing that factors such as economic conditions, state and national trends, location, student population served, length of program, students who withdraw from training but still obtain employment, state requirements, or other external or mitigating factors reasonably related to student achievement are adversely impacting the school's ability to meet the Commission's established benchmark rates.
- 64. Upon presentation by a school, the Commission may consider an aggregated institutional rate of graduation or employment attainment in determining whether to take a programmatic or institutional action related to student achievement.

<sup>&</sup>lt;sup>1</sup> This includes any exam that is required by a governmental entity for employment in a field, regardless of the exam's title or whether passing the exam results in a license, certification, or any other validation credential.

<sup>&</sup>lt;sup>2</sup> See Appendix VI for the Commission's current established benchmark rates for acceptable student achievement.

<sup>&</sup>lt;sup>3</sup> If another entity or agency requires a higher examination pass rate, the higher standard shall apply and the Commission will take into consideration any action taken by another oversight entity or agency with regard to a school's failure to meet an examination pass rate requirement.

### 2. Student Achievement Outcomes Monitoring and Reporting

For any program that has a graduation, employment, or licensure/certification pass rate that falls below the Commission's established benchmark rate, the Commission will require a school to submit to heightened monitoring or reporting of student achievement outcomes as directed or take other action as deemed appropriate unless the school can otherwise demonstrate successful student achievement as described in Section VII (B)(1)(b)(iii), Substantive Standards above.

- a. Heightened monitoring will require, at a minimum, detailed annual review of a program's graduation and/or employment rate(s) and may require the submission of additional student achievement outcomes information as appropriate (e.g., plans for improvement; an updated Graduation and Employment Chart; current program retention, graduation, employment and/or licensure/certification pass rate(s); supporting documentation; etc.). [Already included in Section VII (I), Rules of Process and Procedures, Standards of Accreditation]
- b. Reporting will require the submission of student achievement outcomes data (e.g., student program retention, graduation rates, and employment rates); pass rates on licensure/certification examinations and examinations required to be taken as a condition of employment (i.e., local, state, and federal); admissions criteria studies; institutional operations and improvement planning activities; or any other information that the Commission determines necessary to make a judgment regarding the successful achievement of students. [Already included in Section VII (J), Rules of Process and Procedures, Standards of Accreditation]
- e. The Commission at its discretion may take a programmatic action such as to require an on site evaluation; temporarily require a school to cease enrollment in a program; suspend or revoke program, degree granting, or distance education approval; or may take an institutional action such as to issue a Warning or Probation Order (see Section VII, Rules of Process and Procedure, Standards of Accreditation) when the Commission has determined that the school has not demonstrated acceptable student achievement either through its student learning assessment efforts; graduation, employment attainment, and/or licensure/certification exam pass rate(s); or a combination thereof. [Already included in Section VII (K, L, & R), Rules of Process and Procedures, Standards of Accreditation]

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## Initial Applicant Waiver, Application for a Change of Control, and Application for Appeal of a Commission Decision Fees

Appendix I, Substantive Standards, Standards of Accreditation

### **Initial Applicant Waiver**

Currently, the Required Fee for a Request for a Waiver of a Standard or Policy is the same amount for Initial Applicants as it is for member schools – \$250. Insofar as member schools pay annual sustaining fees, the intent of the \$250 waiver fee was meant to be offset by the sustaining fees. As initial applicants do not pay sustaining fees, the Commission feels that nonmember schools should pay an unsubsidized fee for requesting that the Commission waive a standard or requirement. In addition, there have been times that initial applicants appear to have simply sought waivers rather than making the necessary changes to meet ACCSC eligibility requirements. Often in the case of initial applicants, a waiver request requires a significant level of review and deliberation pertaining to fundamental eligibility accreditation requirement(s), as compared to requests typically received from member schools. Therefore, the Commission proposes that the fee for waiver requests submitted by initial applicants be increased to \$1,000.

## **Application for Appeal of a Commission Decision**

The Commission has found that the costs necessary to complete the review process for the appeal of a Commission adverse decision have increased and the proposed fee increase is meant to offset those costs and to reduce the reliance on sustaining fees for the shortfall. While the Commission does not intend for the appeal process to be cost prohibitive, the Commission does not believe that school sustaining fees should be the primary source of revenue to conduct this service.

#### **Application for Change of Control**

Currently, the fee for an Application for a Change of Control-Part I is based on the transaction cost and is divided into two tiers: "Transactions \$5 million or Less" and "Transactions Greater than \$5 million." However, in practice the Commission has noted that larger more complex transactions require significantly greater review. Also, the Commission has found that that the Part II applications also require additional time and review, due in part to changes in federal requirements. Therefore, the Commission proposes that the fees for Applications for Change of Control be divided amongst three tiers and increased as shown below.

Proposed new language in *red*, *bold*, *and italic text*, proposed deleted language in <del>blue strikethrough text</del>, and moved language in either *green*, *bold*, *and italic text* or <del>green strikethrough text</del>.

### APPENDIX I – ACCREDITATION FEES

• Part I Transaction Greater than \$10 million

Request for a Waiver of a Standard or Policy	<del>\$250</del>
Member School	\$250
Non-Member School	\$1,000
Application for Appeal of a Commission Decision	\$68,000
Application for a Change of Control	
<ul> <li>Part I Transaction Less than \$5 million or Less</li> </ul>	
Main School	\$4,000 <sup>†</sup>
Branch Campus	\$2,500
<ul> <li>Part I Transaction Greater than \$5 million to \$10 million</li> </ul>	
Main School	\$6,000 <sup>†</sup>
Branch Campus	\$2,500

Main School	\$8,000 <sup>†</sup>
Branch Campus	\$2,500
Part II Main School	\$ <del>500</del> 750
Part II Branch Campus	\$ <del>250</del> 500

<sup>&</sup>lt;sup>†</sup> In instances where the Commission needs to seek outside counsel or opinion related to a proposed change of control or ownership, the associated costs will be passed on to the school.

# Guidelines for Employment Classification Appendix VII, Substantive Standards, Standards of Accreditation

Currently, the Guidelines for Employment Classification ("Guidelines") state that the verification documentation for self-employed graduates requires that when licensure is required for employment, the self-employed graduate attests that such licensure has been achieved. The Commission has found in some cases that although licensure is required to work in the field, states/governmental regulatory entities may have an allowance where a graduate can work under a licensed practitioner before obtaining licensure. The current Guidelines do not take such an allowance into account. To align with such instances, the Commission proposes the following revisions to the Guidelines.

Proposed new language in *red*, *bold*, *and italic text* and proposed deleted text in <del>blue strikethrough text</del>.

### APPENDIX VII – GUIDELINES FOR EMPLOYMENT CLASSIFICATION

- 4. The employment classification is verified by the school (and verifiable by third parties such as the Commission) as follows:
  - b. Self-Employment:

The school secures written documentation from the self-employed graduate verifying that the employment is valid including, at a minimum, a statement signed by the graduate which includes the following:

- The graduate's name and contact information;
- An attestation that the self-employment is aligned with the individual's employment goals, is vocational, and is based on and related to the education and training received;
- An attestation that the graduate is earning consistent training-related income; and
- In cases where licensure is required for employment, an attestation that such licensure has been achieved. An attestation that any required licensure for employment has been achieved, if applicable (e.g., this would not apply in cases where the state or regulatory entity would allow an individual to work under a licensed practitioner before obtaining licensure).

# Advertising Appendix IV, Standards of Accreditation

Previously, the Commission considered 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. In July 2021, the Commission updated Section IV (B)(4), Substantive Standards, Standards of Accreditation – Endorsements, Images, and Publicly Shared Media to:

- Include a definition of an endorsement;
- Address the use images; and
- Set forth clear guidelines for the use of publicly shared media.

In the July 2021 Accreditation Alert, the Commission also provided example scenarios for schools to help make the Commission's expectations clear. To further assist schools in this process, the Commission is interested in making this type of guidance more readily available (e.g., not just provided in an Alert).

In addition, recently there have been questions from schools regarding the use of an abbreviated school name in advertising and signage and how to promote School of Excellence and School of Distinction awards in advertising. As such, the Commission proposes revisions to the current *Instructions for the Advertising of Accredited Status* to include more areas of advertising – expanding beyond just the advertising of accredited status – and that this guidance be added as part of *Appendix IV* titled ACCSC Guidelines for Advertising. The proposed revisions seek to provide guidance regarding:

- The use of the school's name in advertising;
- The use of publicly shared media as previously included in the July 2021 Accreditation Alert; and
- The advertising of institutional awards from ACCSC.

Proposed new language in *red*, *bold*, *and italic text*, deleted language in *blue strikethrough text*, and moved language in either *green*, *bold*, *and italic text* or *green strikethrough text*.

## APPENDIX IV – RECRUITMENT AND ADVERTISING

## ADMISSIONS PERSONNEL CODE OF CONDUCT

## RECRUITMENT AND ADMISSIONS PERSONNEL CODE OF CONDUCT

\*\*\*\*

## INSTRUCTIONS ACCSC GUIDELINES FOR THE ADVERTISING OF ACCREDITED STATUS

- 1. Pursuant to Section IV (A)(7), Substantive Standards, Standards of Accreditation, a school approves all promotional materials used by school personnel in advance and accepts full responsibility for the materials used.
- 2. Pursuant to Section IV (B)(1), Substantive Standards, Standards of Accreditation, a A school's advertising and promotional materials, including the school's name, are truthful and accurate and avoid leaving any false, misleading, or exaggerated impressions with respect to the school or its accredited status.
- 3. A school may only advertise its name as approved by the Commission except that a school may use an abbreviation in its advertising so long as the school's full name is included at least once. In addition, a school may also use an abbreviation of its name for building signage and in documents provided to students, so long as the school's full name is used in those circumstances prominently at least once.
- 43. An ACCSC-accredited institution may publish official affiliation with the Accrediting Commission of Career Schools and Colleges by imprinting the ACCSC logo on advertising, literature, or other publication. The ACCSC logo is available for download under the Resources section at www.accsc.org.



- 54. When citing accreditation status in advertising, literature, or publications, the following types of references, or substantially similar, may be used:
  - a. Accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC). This reference may be used alone; with the name of the school/institution/college\*/university† immediately preceding; or as a part of a sentence prefixed by phrases such as:
    - This [school/institution/college\*/university†] is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).
    - Our [school/institution/ college\*/university†] is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).
    - [Institution Name] is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).
  - b. Accredited [Member/Institution/School/College\*/University†], Accrediting Commission of Career Schools and Colleges.
  - c. Accredited Member/Institution/School/College\*/University† ACCSC.

<sup>\*</sup> If permitted by applicable law.

<sup>†</sup> A school may use the term "University" in its name only when such use has been approved by the Commission and appropriate state authorities (Section  $I \not\vdash (B \not\vdash F) (\stackrel{?}{\Rightarrow} 2)$ , Substantive Standards, Standards of Accreditation).

- 65. ACCSC-accredited institutions may not use the phrase "fully accredited."
- 7. An applicant institution seeking accreditation from ACCSC may not make any promotional use of its application for accreditation prior to a grant of accreditation or approval of a main school's branch application, and may not use the ACCSC logo in any publication until the Commission has conferred accreditation.
- **86.** When referencing the accredited status of a satellite location in advertising, the following statement must be included:
  - (Name of satellite location) is recognized by the Accrediting Commission of Career Schools and Colleges (ACCSC) as a satellite location of (name and location of main school/branch).
- 9. For Occupational Associate Degrees, all advertising, promotional materials, and literature make clear that the degree is occupational not academic (Section II (C)(2)(c)(iii), Substantive Standards, Standards of Accreditation).
- 107. When referencing ACCSC's recognition by the U.S. Department of Education, the following types of statements may be used:
  - The Accrediting Commission of Career Schools and Colleges/ACCSC is recognized by the Secretary of the U.S. Department of Education as a reliable authority concerning the quality of education or training offered by the institutions it accredits.
  - The Accrediting Commission of Career Schools and Colleges/ACCSC is a recognized *institutional* accrediting agency by the U.S. Department of Education.
  - The Accrediting Commission of Career Schools and Colleges/ACCSC is recognized by the U.S. Department of Education as an institutionally recognized accrediting agency ACCSC is a recognized accrediting agency by the U.S. Department of Education.
- 8. An applicant institution seeking accreditation from ACCSC may not make any promotional use of its application for accreditation prior to a grant of accreditation or approval of a main school's branch application, and may not use the ACCSC logo in any publication until the Commission has conferred accreditation.
- 119. When citing recognition as an ACCSC School of Distinction or an ACCSC School of Excellence in advertising, literature, or publications, the following types of references, or substantially similar, references may be used:
  - [Institution Name] has been recognized by ACCSC as a [Year] ACCSC School of Distinction/ ACCSC School of Excellence.
  - ACCSC has recognized [Institution Name] as a [Year] ACCSC School of Distinction/ACCSC School of Excellence.
  - [Institution Name] has fulfilled ACCSC's requirements for institutions seeking [initial/renewal of] accreditation and has been recognized as a [Year] ACCSC School of Distinction/ACCSC School of Excellence.
  - ACCSC only awards the School of Distinction / School of Excellence to an institution in conjunction with a school's initial or renewal of accreditation review, which generally occurs every 5 years / which last occurred for the school in [YEAR].
  - Examples *include*:
    - ABC Technical Institute has been recognized by ACCSC as a 2022 ACCSC School of Distinction.\*

<sup>\*</sup>ACCSC only awards School of Distinction to an institution in conjunction with a school's initial or renewal of accreditation review, which occurred in 2022 for our school.

- ACCSC has recognized ABC Technical Institute as a 2016 and 2022 ACCSC School of Excellence. ACCSC only awards School of Excellence to an institution in conjunction with a school's initial or renewal of accreditation review, which for ABC Technical Institute occurred in 2016 and 2022.
- The Accrediting Commission of Career School and Colleges has recognized ABC College as a 2022 ACCSC School of Excellence.
- ABC Technical Institute has fulfilled ACCSC's requirements for institutions seeking renewal of accreditation and has been recognized as a 2022 ACCSC School of Distinction.
- 12. Section IV (B)(4), Substantive Standards, Standards of Accreditation: In this section of the standards, the Commission has established a distinction between "endorsements" and "publicly 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 standards 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 publicly shared media (e.g., a social media site), 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."

Below are illustrative examples to provide guidance regarding compliance with Section IV (B)(4), Substantive Standards, Standards of Accreditation:

## 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.

Guidance: 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 it 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.

Guidance: 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.

Guidance: 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 social media 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 social media account with the caption "We are so excited to share our student success stories."

Guidance: 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 social media account content regarding his experience at a school. The school reposts this on its own social media account. The school also would like to pay for the student's content to be "boosted" or amplified in the social media algorithm so that it will appear more frequently in other user's feeds.

Guidance: 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 for the school to post this content to its own social media. However, in this scenario and others like it (i.e., regardless of whether the student is a current student or a graduated student), the school's re-use in this manner renders the content to be an advertisement/endorsement and the school would be required to follow all advertising and endorsement standards and prohibitions as applicable.

Scenario: A current student posts to his social media 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."

Guidance: 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.

Guidance: 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.

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.

## **Catalog Checklist**

In reviewing the manner in which school's disclose information to students, the range of policies and practices of individual schools/campuses, and the requirements of the ACCSC Catalog Checklist, the Commission has attempted to make its expectations for disclosure requirements more clear for schools and students. In addition, the Commission found in some cases where there have been changes to the *Standards of Accreditation* that those changes need also to be added to the Catalog Checklist, such as policies related experiential learning and emergency preparedness. While the range of proposed revisions looks to be significant, move of the proposed changes equates to reorganization of the disclosure requirements.

Therefore, the Commission proposes to:

- Reorganize the items into the categories of Required Items, Program Specific Items, and Conditional Items;
- Add policy areas where needed; and
- Clarify items for schools and students.

Proposed new language in *red*, *bold*, *and italic text*, deleted language in <del>blue strikethrough text</del>, and moved language in either *green*, *bold*, *and italic text* or <del>green strikethrough text</del>.

## CATALOG CHECKLIST

**Accrediting Commission of Career Schools and Colleges** 

This	checklist n	nust be o	cross-referenced	l to and acco	ompanied by	the school's catalog.

School Name:	Schoo	l Number:	Date:
Address:	City:	State:	Zip code:

The Catalog Checklist provides a list of each item required for inclusion in a school's catalog and serves as a detailed index to aid reviewers in finding each of these requirements. A copy of this Catalog Checklist is to accompany each catalog sent to the Commission. Mark the Catalog Checklist to show page number(s) (or references to specific covers or supplements) where each required item is included. Mark the catalog with the Catalog Checklist item number at the location where the required information appears. The catalog of each ACCSC accredited school must include the following items. If any item is not included, the catalog must refer to the supplement/addendum which contains the item, and the supplement/addendum must refer to the catalog. The supplement/addendum must contain the school's name and location and the effective date of the supplement/addendum.

As per  $Section\ IV\ (C)(1)(b)$ ,  $Substantive\ Standards$ ,  $Standards\ of\ Accreditation$ , the catalog must be designed, written, printed, and bound to convey an accurate and dignified impression of the school. The catalog's illustrations, photos and narrative must pertain directly to the school and sources of illustrations and photos must be clearly identified.

Item Number	Catalog Checklist <del>Item</del> – <i>Required Items</i>	Page Number(s)
1.	The title of the publication (i.e., "catalog").	
2.	The name and address of the school.	
3.	The date of publication (month/year).	
4.	The school's mission statement.	
5.	A statement of the school's history.	
6.	A <i>general</i> description of the school's <del>general</del> physical facilities, <i>learning resource system</i> , and equipment.	
7.	The maximum number of students in typical classroom or laboratory/shop settings of instruction.	
8.	The school's admissions requirements for each program.	
9.	The school's admission procedures.	
<del>10.</del>	The transfer of credit policy to include the criteria and process for evaluating and accepting credit earned at other institutions for transfer, as well as any types of institutions or sources from which the institution will not accept credits <sup>‡</sup>	
<del>11.</del>	The total number of clock hours or credit hours as applicable for each course and program.	
<del>12.</del>	As applicable, the type of credit hour awarded, semester or quarter.	
<del>13.</del>	The length of time in weeks or months normally required for completion of each program.	

Item Number	Catalog Checklist <del>Item</del> – <i>Required Items</i>	Page Number(s)
	A clear description of each program offered by the school to include:	
	• The program title,	
	• Educational objectives,	
<del>14.</del>	<ul> <li>Scope and course sequence,</li> </ul>	
	Course descriptions, and	
	<ul> <li>The name, nature, and level of occupations (e.g., entry level) for which training is provided.</li> </ul>	
<del>15</del> 10.	The school's policy relating to attendance.	
<del>16</del> 11.	The school's policy relating to make-up work.	
<del>17</del> .	The leave of absence policy if the school allows students to take a leave of absence.	
12.	The effect of course withdrawals, course incompletion, and course failures including how the student will be notified if the expected graduation date will change.	
<del>18</del> 13.	The school's policy relating to conduct.	
<del>19</del> 14.	The school's policy and procedures relating to probation and termination.	
<del>20</del> 15.	The school's grading / assessment system(s)-used.	
<del>21</del> 16.	The school's satisfactory progress policy.	
<del>22</del> 17.	The required levels of performance for graduation.	
<del>23.</del>	The credential (certificate, diploma, or occupational associates, academic associates, etc.) awarded upon graduation for each program.	
<del>24</del> 18.	The total tuition <i>for the program</i> and other <i>estimated</i> student charges related to the enrollment, such as deposits, fees, books, supplies, tools, equipment, transportation, <i>and</i> graduation and any other "extras" e.g., make up work, special testing, equipment, late charges, or other school services (e.g., transcript requests) for which a student may be responsible.	
<del>25</del> 19.	The refund policy and a statement indicating where information regarding any applicable third party funding agency refund or return of funds policies (e.g., Title IV, Veterans Administration, WIA, etc.) may be obtained. (Please note that the refund policy in the school's catalog must be consistently disclosed in the school's enrollment agreement – see Section $I(D)(5) & (6)3)(e)$ , Substantive Standards, Standards of Accreditation).	
<del>26</del> 20.	A detailed and explicit description of the extent and nature of employment assistance available to students and/or graduates.	
<del>27</del> 21.	A detailed description of the nature and extent of all available student services and how students go about obtaining such services.	
<del>28</del> 22.	A calendar for the school year including vacation periods, breaks, holidays, etc.	
<del>29.</del>	A list all separate facilities. If a different catalog is used for a separate facility, it must include the name and location of the main school or branch, and must clearly disclose and define the relationship between a branch campus and its main school or between a satellite location and its branch campus or main school oversight entity.*	
23.	Emergency preparedness information and/or a statement indicating where information regarding the school's written emergency preparedness plan may be obtained.	
<del>30</del> 24.	The <i>school's</i> complaint policy and procedures which includes, at a minimum, all items required in the Student Complaint Procedures of the ACCSC Complaint Review Process Form.*	

Item Number	Catalog Checklist <del>Item</del> – <i>Required Items</i>	Page Number(s)
<del>31.</del>	If the school offers a course with secondary objectives, **** a designation and disclosure that clearly shows the course(s) are not within the school's scope of accredited programs, except those that fall under item #32 of this checklist.	
	If the school offers a course with secondary objectives that have been approved by ACCSC to be included as within the school's scope of institutional accreditation, the school's catalog must include:	
	<ul> <li>A statement making clear the course is not vocational in nature and does not lead to initial employment;</li> </ul>	
<del>32.</del>	<ul> <li>A course description that clearly shows the clock hour length, length in days or weeks, and educational scope of the course;</li> </ul>	
	<ul> <li>Whether the course is a prerequisite or provides credit toward any vocational program offered within the school;</li> </ul>	
	<ul> <li>The type of completion document provided by the school upon completion;</li> <li>The refund policy; and</li> </ul>	
	The complaint policy in accordance with #30 of this checklist.	
<del>33.</del>	Items as may be required by any regulatory or governmental bodies (such as state licensing and approval agencies).	

<sup>\*</sup> Item #24 – Section IV (B)(1), Substantive Standards, Standards of Accreditation requires that institutions avoid the use of ACCSC accredited status in a false or misleading manner. Therefore, applicant schools and proposed branches should not publish Catalog Checklist Item #24 in the applicant school's catalog or proposed branch's catalog. Rather, applicant schools and proposed branches should submit - with each copy of the school's catalog submitted for Commission review - a draft copy of Checklist Item #24 for inclusion in the school's catalog upon a grant of accreditation.

Item Number	Catalog Checklist <del>Item</del> – <b>Program Specific Items</b>	Page Number(s)
25.	The program title for each program offered by the school.	
26.	As applicable, any program specific admissions criteria.	
27.	As applicable, the type of credit hour awarded, semester or quarter.	
28.	The total number of clock hours or credit hours as applicable for each course and program.	
29.	The length of time in weeks or months normally required for completion of each program.	
30.	The educational objectives for each program offered by the school.	
31.	The scope and course sequence for each program offered by the school.	
32.	The course descriptions for each program offered by the school.	
33.	The name, nature, and level of occupations (e.g., entry-level) for which training is provided for each program offered by the school.	
34.	As applicable, any programmatic graduation requirements.	
35.	The credential (certificate, diploma, or occupational associates, academic associates, etc.) awarded upon graduation for each program.	

Item Number	Catalog Checklist <del>Item</del> – <i>Conditional Items</i>	Page Number(s)
36.	The transfer of credit policy to include the criteria and process for evaluating and accepting credit earned at other institutions for transfer, as well as any types of institutions or sources from which the institution will not accept credits $^{\ddagger}$ (see Section II (A)(10)(a), Substantive Standards, Standards of Accreditation).	
<i>37</i> .	The prior learning experience policy to include the criteria and process for evaluating and accepting credit for documented equivalent prior learning experience gained (see Section II $(A)(10)(b)$ , Substantive Standards, Standards of Accreditation).	
38.	The independent study policy.	
39.	The school's leave of absence policy if the school allows students to take a leave of absence.	
40.	Any other school charges/fees that a student may incur in areas such as make-up work, special testing, equipment, late charges, or licensure examinations, or other school services (e.g., transcript requests).	
41.	Items as may be required by any regulatory or governmental bodies (such as state licensing and approval agencies).	
42.	As applicable, a list of all separate facilities. If a different catalog is used for a separate facility, it must include the name and location of the main school or branch and must clearly disclose and define the relationship between a branch campus and its main school or between a satellite location and its branch campus or main school oversight entity.*	
43.	If the school offers a course with secondary objectives,** a designation and disclosure that clearly shows the course(s) are not within the school's scope of accredited programs, except those that fall under item #44 of this checklist.	
	If the school offers a course with secondary objectives that have been approved by ACCSC to be included as within the school's scope of institutional accreditation, the school's catalog must include:  • A statement making clear the course is not vocational in nature and does not lead to initial	
44.	<ul> <li>employment;</li> <li>A course description that clearly shows the clock hour length, length in days or weeks, and educational scope of the course;</li> </ul>	
	<ul> <li>Whether the course is a prerequisite or provides credit toward any vocational program offered within the school;</li> </ul>	
	<ul> <li>The type of completion document provided by the school upon completion;</li> <li>The refund policy; and</li> </ul>	
	The complaint policy in accordance with #24 of this checklist.	

- † Item #10 Section II (A)(II)(e), Substantive Standards, Standards of Accreditation indicates that a school may award credit based on an incoming student's prior learning experience, provided that the school has appropriate written criteria used to evaluate equivalency and award credit for only such prior learning experience garnered through education and training in areas such as, service in the armed forces, employment and on the job training, apprenticeships, or other demonstrated competency or learning sources. Credits awarded may not exceed 10% of the credits required for the program.
- \* Item #2942 Section VIII (D)(3), Substantive Standards, Standards of Accreditation indicates that a branch may advertise and disclose its relationship to the main school only after the approval of the Application for a Branch Part I. A satellite location may disclose its recognized status and relationship to the main school only after it has been granted recognition by the Commission. A school submitting a proposed branch catalog should not include the proposed branch's affiliation to the main school until the Commission has approved the Application for a Branch Part I.
- \*\* Item #30 Section IV (B)(1), Substantive Standards, Standards of Accreditation requires that institutions avoid the use of ACCSC accredited status in a false or misleading manner. Therefore, applicant schools and proposed branches should not publish Catalog Checklist Item #30 in the applicant school's catalog or proposed branch's catalog. Rather, applicant schools and proposed branches should submit—with each copy of the school's catalog submitted for Commission review—a draft copy of Checklist Item #30 for inclusion in the school's catalog upon a grant of accreditation.
- \*\* Item #3143 See Section I (B)(1)(d)(ii) Rules of Process and Procedure, Standards of Accreditation.

## **Enrollment Agreement Checklist**

Based on feedback from the Commission's various review process and comments from accredited schools, the Commission is attempting to clarify sections of the *Enrollment Agreement Checklist*, specifically with regard to:

- Tuition and other fee charges;
- Program schedules;
- Refund policies; and
- The use of a unique student identifier.

The Commission is particularly interested in receiving feedback on these proposed revisions in an effort to ensure the clarity of its expectations. With regard to the use of a unique student identifier, the Commission continues to see school's utilizing student Social Security Numbers as the student identifier and again wishes to encourage school to cease this practice.

In the document, original proposed new language in *red*, *bold*, *italic text*, deleted language in *blue* strikethrough text, and moved language in *green*, *bold*, *and italic text*.

## ENROLLMENT AGREEMENT CHECKLIST

Accrediting Commission of Career Schools and Colleges (ACCSC)

This checklist must be cross-referenced to and accompanied by the school's enrollment agreement.

School Name:	Schoo	ol Number:	Date:
Addross	City	State ·	Zin code:

The Enrollment Agreement Checklist provides a list of each item required for inclusion in a school's enrollment agreement and serves as a detailed index to aid reviewers in finding each of these requirements. A copy of this Enrollment Agreement Checklist is to accompany each enrollment agreement copy sent to the Commission. Mark the Enrollment Agreement Checklist to show the page number(s) where each item is included. Mark the enrollment agreement with the Enrollment Agreement Checklist item number at the location where the required information appears. The enrollment agreement of each ACCSC-accredited school must include all required items (Items 1 through 19). As applicable, the school's enrollment agreement must also include conditional items (Items 20 through 302) which disclose and outline any other conditions, circumstances, or qualifications imposed by the school.

#### **REQUIRED ITEMS:**

Item Number	Enrollment Agreement Checklist - <i>Required</i> Items	Page Number(s)
1.	Title of agreement.	
2.	Name and address of school.	
3.	Program title.	
4.	Number of clock hours (or credit units, if applicable), including the number of weeks or months required for graduation.	
5.	Type of document (certificate, diploma, or degree) awarded upon graduation.	
6.	The tuition period <i>and tuition charged for the period</i> which the agreement covers (e.g., quarter, semester, etc.) and the number and length of such periods required for graduation must be clearly disclosed.	
7.	The total tuition for the program and otherestimated student charges related to the enrollment, such as deposits, fees, books, supplies, tools, equipment, transportation, and graduation any other "extras" e.g., make up work, special testing, equipment, late charges, or other school services for which a student may be responsible.	
8.	Payment method and terms of payment.	
9.	Starting date of program.	
10.	Specific Expected days and times of class attendance. In distance education asynchronous programs, a statement that students are responsible to complete the coursework within the prescribed timeframes.	
11.	Grounds for cancellation / termination by the school.	
12.	Procedures for <i>student</i> requesting cancellation $\frac{1}{2}$ termination by the student (see also Section $I(D)(42)(a-bc)$ , Substantive Standards, Standards of Accreditation).	

Item Number	Enrollment Agreement Checklist - <i>Required</i> Items	Page Number(s)
13.	The school's refund policy as disclosed in the school's catalog $^{4}$ -(see also Section I (D)( $\stackrel{\leftarrow}{5}$ ), Substantive Standards, Standards of Accreditation). This may be a summary of the refund policy provided that: a) the summary is consistent with the full policy as disclosed in the catalog; b) the summary refers to the full refund policy published in the school catalog; and (c) the summary contains minimally: (i) information pertaining to how refunds are calculated (e.g., pro-rata), (ii) the date from which refunds will be calculated, and (iii) the order that and timeframe within which refunds will be made.	
14.	Disclaimer of employment guarantee.	
15.	Acknowledgment statement in large and conspicuous print that the student has read and received a copy of the enrollment agreement.	
16	Acknowledgment statement in large and conspicuous print that the student has read and received a copy of the school catalog and understands and agrees to the school's policies published in the catalog.	
17.	<i>Name</i> , <i>unique identifier</i> , <i>and s</i> Signature of applicant and date signed (parent or other sponsor may sign, as applicable).	
18.	Name, title, and seignature of appropriate accepting school official (excluding those involved in recruiting and admissions activities) and the acceptance date, constituting admission into the school.	
19.	Each page must be clearly and conspicuously paginated providing the page number and the total number of pages in the agreement (i.e., Page 1 of 5, Page 2 of 5, etc.).	

## **CONDITIONAL ITEMS:**

Item Number	Enrollment Agreement Checklist - Conditional Items	Page Number(s)
20.	Items as may be required by any regulatory or governmental bodies (such as state licensing and approval agencies).	
21.	The name and location of the main school or branch, and a clear disclosure that defines the relationship between a branch campus and its main school or between a satellite location and its branch campus or main school oversight entity, where applicable <sup>2</sup> . *	
22.	Reasons and maximum period for possible delay of scheduled starting date with list of alternatives and effect on the refund policy.	
23.	Nature and extent of possible changes in program content, materials, or schedule and extra expenses to the student.	
24.	As applicable, Sspecial graduation conditions or requirements must be listed.	
25.	Compliance with appropriate state and local retail installment requirements (e.g., type size, notice to buyer, computation box, etc.), as well as compliance with Federal Truth-In-Lending requirements (Regulation Z) if more than four payments are scheduled (e.g., mention of interest rates) must be outlined. The school's enrollment agreement must contain a statement if there is a separate retail sales contract and, at a minimum, incorporate that document in the enrollment agreement by reference.	

<sup>&</sup>lt;sup>1</sup>-This may be a summary of the refund policy provided that: a) the summary is consistent with the full policy as disclosed in the catalog; b) the summary refers to the full refund policy published in the school catalog; and (e) the summary contains minimally:
(i) information pertaining to how refunds are calculated (e.g., pro rata), (ii) the date from which refunds will be calculated, and (iii) the order that and timeframe within which refunds will be made.

<sup>&</sup>lt;sup>2</sup> Section VIII (D)(3), Substantive Standards, Standards of Accreditation indicates that a branch may advertise and disclose its relationship to the main school only after the approval of the Application for a Branch – Part I. A satellite location may disclose its recognized status and relationship to the main school only after it has been granted recognition by the Commission. A school submitting a proposed branch catalog should not include the proposed branch's affiliation to the main school until the Commission has approved the Application for a Branch – Part I.

Item Number	Enrollment Agreement Checklist - Conditional Items	Page Number(s)
26.	As applicable, any other school charges/fees that a student may incur in areas such as make-up work, special testing, equipment, late charges, or licensure examinations, or other school services (e.g., transcript requests) or a statement indicating where the information may be obtained.	
<del>26</del> 27.	If the school reserves the right to adjust tuition rates before completion of the program, specific points in the program at which tuition changes may occur (school year, quarter, etc.) and the amount of reasonable advance notice to students must be outlined.	
<del>27</del> 28.	Requirements that student (and financial sponsors, if any) authorize the sale, discount or transfer of agreement or promissory notes and statement that the refund policy continues to apply must be outlined.	
<del>28</del> 29.	Name of the field representative and compliance with Federal Trade Commission door-to-door sales rule must be disclosed for any contacts made away from the school premises.	
<del>29</del> 30.	If a parent company, headquarters, or other organization or agency, separate from the school, is involved in the student contact or relations, name and address of the company or agency, nature of the anticipated contact or relations, role of the school in arranging the contact and in settlement of possible disputes must be outlined.	
<del>30<b>31</b></del> .	If the school offers a course with secondary objectives <sup>1</sup> that have been approved by ACCSC to be included as within the school's scope of institutional accreditation, the school must use an Enrollment Agreement in conformance with all items of the Enrollment Agreement Checklist (replace "program" with "course" in the requirements).	
<del>3132</del> .	Additional disclosures of rights, obligations, requirements, and conditions created by the enrollment agreement not specifically identified herein must be outlined.	

<sup>-</sup>

 $<sup>^1</sup>$  See Section I (B)(1)(d)(ii) Rules of Process and Procedure, Standards of Accreditation and Section I (B)(3)(c) Rules of Process and Procedure, Standards of Accreditation.