ACCSC

Accrediting Commission of Career Schools and Colleges

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ACCSC INDEPENDENT THIRD-PARTY EMPLOYMENT VERIFICATION

FREQUENTLY ASKED QUESTIONS

Q: Where can I find information on ACCSC's requirements for Independent Third Party Employment Verification?

A: ACCSC's Guidelines for Independent Third Party Employment Verification

Q: Does my school have to have an independent third-party verification of employment data every year?

A: No. ACCSC requires independent third-party verification only at the time of the Application for Renewal or Initial Accreditation and results are due at the same time as the Self-Evaluation Report ("SER"). A school may opt to have employment information verified annually or on-going if it chooses to.

Q: Which Annual Report data should we get third-party verified?

A: For ACCSC-accredited schools undergoing Renewal of Accreditation:

The Annual Report date will be provided in the school's workshop materials. Generally, schools that attend a workshop in the first half of the calendar year will use the prior year's annual report and schools that attend a workshop in the second half of the calendar year will use that year's annual report.

For Initial Applicant schools:

Initial Applicant schools must have the Graduation & Employment ("G&E") Chart data submitted in the SER third-party verified. The report date to be used on the G&E Chart is based on the due date for the SER and will be provided by the assigned ACCSC Commission representative.

Q: Where should my school send the results of the independent third-party verification of employment data?

A: A summary of the results are to be submitted to ACCSC as part of the SER, which sets forth the requirements and parameters for submission. The Employment Verification requirement can be found under *Section VII (C)* of the SER.

Q: What will an on-site evaluation team review?

A: Accrediting standards require that schools report accurate data to the Commission and that schools meet the established student achievement standards and maintain "verifiable records of initial employment." Thus, an on-site evaluation team will review the results from the independent third-party verification process, and the records the school relied upon to classify graduates as "Employed-in-field" in order to assess if the student achievement data reported to ACCSC are accurate and supported by verifiable records, which demonstrate all items required by *Appendix VII, Standards of Accreditation*. In cases where a graduate's employment could not be verified by the independent third-party, a school can present additional documentation to the on-site evaluation team to demonstrate that the employment classification is valid. If the school does not demonstrate to the on-site evaluation team compliance with accrediting standards through accurate and valid data, the team will likely include a team finding in the On-Site Evaluation Report, and the school will be required to respond to the Commission with supporting documentation to demonstrate that the student achievement data is accurate and verifiable. The Commission, not the on-site evaluation team, makes the final determination regarding a school's compliance with accrediting standards.

Q: In order to be considered independent, the third-party cannot be one that provides "other services" to the school (with the exception of a Certified Public Accountant that serves as the school's independent third-party auditor for financial statements and Title IV compliance audits). What does "other services" mean?

A: "Other services" means that the school, for the purposes of the independent third-party employment verification required as part of the initial and renewal process, must choose a third-party that the school does <u>not have any other contract or arrangement with to provide services or support to the school.</u> Other services are those such as, but not limited to:

- Recruiting, advertising, and admissions;
- Admissions documentation authentication or translation, including immigration documentation assessment and support;
- Education Credit Assessment;
- Background checks and drug screening services;
- Administrative services (e.g., payroll);
- Student support or help desk services;
- Library resources;
- Information technology support;
- Employment placement services;

- Outreach for graduate employment information on behalf of the school;
- Student loan repayment support or management; or
- Any other service to the school with the exception of a Certified Public Accountant that serves as the school's independent third-party auditor for financial statements and Title IV compliance audits.

Q: What if my school chooses to contract with an independent third-party to verify employment data as part of an ongoing verification process prior to submitting Annual Reports? Can my school use that third-party and those results or does my school have to have the data re-verified at the time of the renewal and with a different third-party?

A: The school only needs to have employment data verified by an independent third-party one time during each renewal cycle unless otherwise directed by the Commission. The school may use the same third-party – assuming the third-party meets the Commission's tests to be considered independent as listed in the ACCSC Guidelines for Independent Third-Party Employment Verification – and may use those results as part of the application for accreditation process so long as the school can show the verification results for the data in the school's most recent Annual Report. That third-party, however, cannot be one that provides any other services to the school.

Q: What if my school's independent third-party is able to secure additional verifications (i.e., is able to make contact with employers/graduates that it had been previously trying to get ahold of but was unable to reach) after the school submits the SER and prior to the on-site evaluation?

A: A school may provide the updated information to the on-site evaluation team and may have the independent third-party update the summary of results as long as the updated information was subject to the same methodology identified in the school's SER. In this case, the school would also be required to submit the updated information to the ACCSC office to ensure that it is updated in the school's record with the Commission.

Q: What if my school's employment rate increased (using the <u>same report date</u>) since the time of the Annual Report - can my school provide an updated G&E Chart to the on-site evaluation team?

A: If a school wishes to present an updated version of the G&E Chart that was submitted in the school's Annual Report, the updated G&E Chart must be verified in addition to the G&E Chart submitted in the Annual Report, and must be verified using the same methodology and reported on separately by the independent third-party in order to be considered by the Commission in making an accreditation decision.

Q: Can my school provide the on-site evaluation team with G&E Charts using a <u>more recent</u> <u>report date</u> than that which was submitted in the annual report?

A: If a school wishes to present a G&E Chart using a more recent Report Date than that which was submitted in the school's most recently submitted Annual Report, that G&E Chart must be verified in addition to the G&E Chart submitted in the Annual Report, and must be verified using the same methodology and reported on separately by the independent third-party in order to be considered by the Commission in making an accreditation decision.

Q: What does my school need to have ready for the on-site evaluation team?

A: The school must be prepared to provide the on-site evaluation team with the detailed results from the independent third-party's findings including a list of the students in the sample, the results for each student, and the reasons for those results. Additionally, the school should be prepared to provide the records of initial employment that the school relied upon to classify graduates as "Employed-in-field." The information needed by the team is identified under *Section VII (C)* of the SER.

Q: What are the expectations regarding the third-party vendor disclosures, past records of integrity, and training as requested in the Self-Evaluation Reports?

A: Given that the independent third-party verification process is required in order to test the accuracy of the data reported to ACCSC, the Commission expects that the school will take steps to ensure that the third-party vendor chosen by the school has owners and managers with past records of integrity as required of our schools. To meet this expectation, the SER requires the school to obtain information and disclosures from the third-party vendor. If the vendor chosen by the school answers YES to any of the disclosure questions, the school should support why that vendor can serve as a reliable source to verify the accuracy of the school's data. In addition, the vendor should be able to articulate how each person directly responsible for executing the verifications was trained in ACCSC's methodology and definitions.

The school is advised to obtain these disclosures prior to choosing a vendor so that if the school is uncomfortable with the vendor's answers in the aforementioned areas, the school may decide that a different vendor is a better fit for this process.

Q: Can a third-party verification vendor and/or results be rejected by the Commission?

A: Yes. The Commission may take any action including rejecting the third-party verification vendor and/or results if:

- The Commission has reason to believe that the independent third-party cannot be considered a reliable source due to the disclosure information included in the vendor's attestation;

- The Commission questions the independent nature of the vendor or the vendor's verification methodology;

- If the project is not completed in compliance with the parameters set forth in the SER (e.g., the vendor alters the sample in an effort to get better results); or

- Anything else that could impact the integrity of the verification results.