

# ACCSC GUIDELINES FOR INDEPENDENT THIRD-PARTY EMPLOYMENT VERIFICATION

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The Commission requires Independent Third-Party Employment Verification for the following:<sup>1</sup>

- The Commission requires that initial and renewal applicants engage an independent third-party auditor to verify the school's most recently reported employment data that will be used for the on-site evaluation process.
- The Commission may also direct a school to undergo a Third-Party Employment Verification at any time.

**Please note: This does not replace the classification and verification/documentation requirements for the school to first verify and maintain listed in *Appendix VII Guidelines for Employment Classification*.**

The purpose of the requirement is a) to assess the school's compliance with *Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation* and whether the school has "verifiable" records of employment and b) to ensure that the institution's records can be relied upon in making decisions about a school's compliance with the Commission's student achievement standards and benchmarks. As stated in the *Standards of Accreditation*, the Commission places a high level of reliance on the accuracy of the information and data provided by institutions in the accreditation process and the institution has the burden of demonstrating compliance with accrediting standards. The requirement of the independent third-party audit facilitates further self-evaluation, improvements in operational procedures, and assists schools in meeting the burden of demonstrating on-going compliance with accrediting standards.

1. The school must engage an independent third-party to verify the employment data in the Graduation and Employment ("G&E") Chart(s) submitted in the Self-Evaluation Report as part of the accreditation process. For initial applicants the verification will cover the Graduation and Employment Chart data submitted with the Self-Evaluation Report and for renewal applicants the verification will cover the Graduation and Employment Chart data submitted in the school's most recent Annual Report. If the Commission directs a school to otherwise undergo an independent third-party employment verification, the Commission action letter will specify which G&E Chart or data must be verified.
2. The independent third-party must select minimally a 50% sample of employed graduates (classified as "Graduates - Employed in the Field") on line 14 of each G&E Chart and report the results from that sample. Once the 50% sample has been selected by the independent third-party, for the purposes of this application, the independent third-party may not alter the sample in an effort to get better results.
3. The independent third-party must obtain verification of the employment records from the employer or graduate either verbally or in writing. This is not just an "audit" of the school's back-up documentation.
4. The independent third-party must verify the employment data in a manner independent from the school. The independent third-party must conduct the verifications without assistance from the school, with the exception of the school's provision of records to be verified.
5. The school must provide the full report from the independent third party verification of employment data to the ACCSC on-site evaluation team, as directed by Appendix B of the SER.

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<sup>1</sup> The Commission also annually selects a random sample of schools for verification which is a different process and is not applicable to these *Guidelines*.

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The school must provide the following as part of the SER or the response to the Commission action letter:

1. Information about the third-party procured by the school for this project as follows:
  - a. Documentation demonstrating that the third-party procured by the school for this project meets the following tests to be considered independent. A signed attestation from the independent third-party that includes the following:
    - i. The independent third-party, and its employees, is not affiliated with the school or share any part ownership in the school or its affiliated schools.
    - ii. The independent third-party does not provide any other services to the school.
    - iii. The independent third-party will only report accurate findings through work conducted in an independent manner.
    - iv. The independent third-party understands and applied the classifications defined in item #2 below exactly as stated.
  - b. A description of the methodology that the verification agency used for the selection of the 50% sample.
  - c. A description of the methodology that the verification agency used for the verification process.
2. A summary of results for each G&E Chart that includes the following (at a minimum):
  - a. The total number of students in the sample;
  - b. The number of students in each of the categories below and the percentage in each category as defined below:

**Verified as Correct** – A record is classified “verified as correct” when the independent third party finds:

- The same employer as listed in the school’s record;
- The start date listed in the school’s record is within 45 days of the verified start date;
- The verified job title is substantively the same as that listed in the school’s record, using the following illustrative guidelines (examples from an Automotive Technology program):
  - Exact Match - The school employment record matches exactly the verified job title e.g., “Mechanic”;
  - Obvious Match - The school employment record states “Mechanic” and the verified job title of, “Auto Mechanic” is an obvious match; or
  - Confirmed Match - The school employment record states “Mechanic” but the verified job title is “Technician II” **and** the employer or graduate confirm that the job responsibilities are substantively the same.

**Verified but Different** – A record is classified “verified but different” when the independent third party finds:

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- A start date that is more than 45 days different from the start date in the school’s employment record; or
- A substantively different job title from that in the school’s employment record (i.e., any job title that is verified to be different from the school’s employment record and is not an obvious match or confirmed match as described above)

**Unable to Verify** – A record is classified “unable to verify” when the independent third party is unable to obtain verification of the school’s employment record from either the employer or the graduate. Of note, the school must use this category if the employer uses a third-party company, for example The Work Number; and

**Verified as Not Correct** – A record is classified “verify as not correct” when the independent third party finds any of the following:

- The graduate is not found in employer’s records;
- The graduate’s initial employer is different than the employer listed in the school’s employment record;
- The graduate denies having worked in the position as stated in the school’s employment record;
- The position listed in the school’s employment record is unpaid or an intern/externship; and
- Other discrepancies that render the school’s employment record as incorrect.

c. The following chart completed for each program:

Independent Third Party Initial Employment Verification Reported Program Rates			
Annual Report Year	Program Title (Credential)		Length of Program (Months)
Total number of students sampled	Total number of available students to sample*	Sample size percentage	
Verified as Correct	Verified but Different	Unable to Verify	Verified as Not Correct

\* Students classified as Graduates - Employed in Field in program

Placements Verified by a Different Independent Third-Party*	
Company Name	Number of Graduates Verified

\* Graduates that were unable to be verified by the school’s chosen vendor but were verified by a different third-party company like “The Work Number.”

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3. The following chart completed with the aggregate institutional results across all programs:

<b>Independent Third Party Initial Employment Verification Reported Institutional Rates</b>			
<b>Annual Report Year</b>		<b>Name of Company</b>	
<b>Total number of students sampled</b>	<b>Total number of available students to sample*</b>	<b>Sample size percentage</b>	
<b>Verified as Correct</b>	<b>Verified but Different</b>	<b>Unable to Verify</b>	<b>Verified as Not Correct</b>

\*Students classified as Graduates - Employed in Field across all programs for Annual Report year

<b>Placements Verified by a Different Independent Third-Party*</b>	
<b>Company Name</b>	<b>Number of Graduates Verified</b>

\* Graduates that were unable to be verified by the school's chosen vendor but were verified by a different third-party company like "The Work Number."

4. An attestation from the third-party vendor regarding the following disclosures/past records of integrity:

<b>DISCLOSURES PERTAINING TO THIRD-PARTY VENDOR:</b>		<b>SELECT ONE (✓)</b>	
		<b>YES</b>	<b>NO</b>
1.	Has any owner, employee, or affiliated contractor been directly or indirectly employed or affiliated with any school which has lost or been denied accreditation by any accrediting agency? If the answer is <b>YES</b> , please attach a statement which details the facts and circumstances surrounding that school's loss or denial of accreditation.		
2.	Has any owner, employee, or affiliated contractor been directly or indirectly employed or affiliated with any school that has closed or entered into bankruptcy? If the answer is <b>YES</b> , please attach a statement which details the facts and circumstances surrounding that school's closure, bankruptcy or both as applicable.		
3.	Has any owner, employee, or affiliated contractor been directly or indirectly employed or affiliated with any school that has lost or been denied eligibility to participate in Federal Student Financial Aid (Title IV) programs? If the answer is <b>YES</b> , please attach a statement which details the facts and circumstances surrounding the loss or denial of Title IV eligibility.		

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DISCLOSURES PERTAINING TO THIRD-PARTY VENDOR:		SELECT ONE (✓)	
		YES	NO
4.	Is any action pending (e.g. court action, audit, inquiry, review, administrative action), or has action been taken, by any court or administrative body (e.g. federal or state court, grand jury, special investigator, U.S. Department of Education, or any state or federal regulatory or law enforcement agency) with regard to any owner, employee, or affiliated contractor or with regard to any institution with which any owner, employee, or affiliated contractor has previously been affiliated? If the answer is <b>YES</b> , please attach a statement which gives full disclosure of the person(s) and the matters involved. Include a statement of the facts and circumstances surrounding the action identifying the owner, employee, or affiliated contractor and the school involved. If the matter is not yet final, please describe the procedural status of the matter (i.e., still under investigation, preliminary decision under appeal, etc.) and the position taken by the owner, employee, or affiliated contractor involved. If the matter is final, provide a copy of the final action documentation.		
5.	Has any owner, employee, or affiliated contractor been employed at or affiliated with a school where either that individual or the school has been charged or indicted in a civil or criminal forum or proceeding alleging fraud, misappropriation, or any criminal act? If the answer is <b>YES</b> , please attach a statement which gives full disclosure of the person(s) and the matters involved. Include a statement of the facts and circumstances surrounding the action identifying the owner, employee, or affiliated contractor and the school which is involved. If the matter is not yet final, please describe the procedural status of the matter (i.e., still under investigation, preliminary decision under appeal, etc.) and the position taken by the owner, employee, or affiliated contractor involved. If the matter is final, provide a copy of the final action documentation.		

- a. The vendor must provide a narrative explanation for YES answers to the questions above.
- b. If the third-party answered YES to any of the items above in this section, the school must provide an explanation as to why the school chose this vendor despite the vendor's disclosures and past records. The school must also articulate how this vendor can serve as a reliable source to verify the accuracy of the school's data.
- c. Explanation of training on ACCSC's methodology and definitions for counting students as verified as correct, verified as different, verified as not correct, or not verified provided to each person directly responsible for executing the independent third-party verifications.