

CALL
FOR

ACCSC
Accrediting Commission of Career Schools and Colleges

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Comment

To: ACCSC-Accredited Institutions and Other Interested Parties
From: Michale S. McComis, Ed.D., Executive Director
Date: May 17, 2024
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:

➤ **Proposed Revisions to Signature Requirements in the *Standards of Accreditation***

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 and are due by ***June 17, 2024***. 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 mccomis@accsc.org.

Proposed Revisions to Signature Requirements in the *Standards of Accreditation*

Over time, expectations for what constitutes a “signature” or “signing” a document has changed given advances in technology and the acceptance of other forms of acknowledgement, particularly in electronic format. Taking these types of changes into account the Commission conducted a review of the *Standards of Accreditation* for areas where signatures are required. The Commission then considered the merit of in-person (e.g., “wet”) signatures versus electronic signatures, current practices by institutions and students, the availability of various forms and formats that support electronic/virtual means of acknowledgment and acceptance, and the requirements of governmental entities in similar circumstances.

The Commission concluded that changes to the *Standards of Accreditation* with regard to signatures may be useful to schools and students while at the same time maintaining the Commission’s expectations of disclosure, acceptance, and acknowledgment that an in-person signature may imply. In so doing, the Commission is proposing the revisions below that begin with a definition of “signature” when used in the context of ACCSC’s accreditation standards. Of paramount importance is that a school can show meaningful interaction that supports and allows students to fully understand that which they are acknowledging and/or accepting. As schools will see in the proposed revisions, although the words “sign,” “signed,” or “signature” may be proposed for deletion, the expectations for full disclosure in no way are diminished and in some instances the school’s burden to make this demonstration may increase. However, the Commission sees merit in, for example, accepting e-mail communication exchanges as official confirmations so long as it is clear that the e-mail came from school on one end and the student on the other.

In addition, if the Commission promulgates changes in the areas addressed below, the Commission will also make conforming and aligning revisions to ACCSC’s forms and applications. Those potential changes are not included here due to the breadth and scope of the known and unknown applicability. However, any final revisions to the *Standards of Accreditation* will include the conforming revisions to the forms and applications.

Lastly, schools will see that the Commission is removing these same terms from the *Rules* for schools submitting official documents for official review. The Commission, however, will likely continue to require verifiable electronic forms of signatures for submissions that attest to accuracy and truthfulness or agree to the terms of the Application for Accreditation.

As is always the case, the Commission is interested in receiving feedback from schools regarding these proposed revisions and encourages the submission of constructive comments that will help to shape the final promulgated standards.

Proposed new language is in **Red, Bold, and Italicized** print.
Proposed deleted language is in ~~blue strikethrough~~.

Instances of Signatures and Signed Document Requirements in the *Standards of Accreditation* with Proposed Revisions

Section I (A), Rules of Process and Procedures, Standards of Accreditation

19. The term “sign(ed)/ing/ature)” means agreeing to, attesting to, acknowledging, accepting, or certifying a document/process/action in a physical or electronic form/format. Any use of electronic signatures must be enforceable, reliable, and used in accordance with applicable state and federal requirements.

Section I (H)(1)(c), Rules of Process and Procedure, Standards of Accreditation:

General Instructions – Submission of Documents to the Commission

- c. Identified with the school’s ACCSC reference number and include a **signed** certification **statement** attesting to the accuracy of the information;

Section I (K)(2), Rules of Process and Procedure, Standards of Accreditation:

Requests for Information

2. A request for information from the Commission by a school or other entity with standing to make such a request must submit **in writing** the request ~~on letterhead~~ **signed** by the appropriate official with authority to make the request.

Section XI (B)(3)(g), Rules of Process and Procedure, Standards of Accreditation:

Pilot Project Application

- g. A certification statement, **signed** by the applicant or its authorized representative, that the information included in the application for a pilot project is true and correct.

Section IV (A)(4 & 13) & Appendix IV, Substantive Standards, Standards of Accreditation:

Recruitment

4. The school’s code of conduct is in writing, includes, minimally, all elements set forth in *Appendix IV, Substantive Standards, Standards of Accreditation*, is **signed accepted** and dated by the individual employee, and a copy of which is maintained in the individual’s personnel file.

Appendix IV - The Code of Conduct must be in writing and **signed accepted**, minimally, by all school personnel whose primary duties include student recruitment and admissions functions.

Appendix V, Substantive Standards, Standards of Accreditation:

Under these circumstances, the student must **sign a statement** attesting that he or she in fact obtained a high school diploma or its equivalent and state the reason(s) why documentation of the earned credential cannot be provided.

Section VII (A)(3)(c)(i), Substantive Standards, Standards of Accreditation:

Leave of Absence

- i. The period of the leave of absence may not begin until the student has submitted and the school has approved a written ~~and signed~~ request for an approved leave of absence except in those cases where unforeseen circumstances would prevent a student from submitting a request in advance.

Appendix II – Applications, Reports, Forms, & Instructions

Applications, reports, and forms submitted for Commission review must be complete, accurate, **signed certified** by the school’s chief executive officer, and filed in a timely manner.

Appendix VII – Guidelines for Employment Classification

Regular Employment

- iii. In cases where a school can show diligent efforts have been made to secure such written documentation without success, the school maintains documentation of verbal verification that includes the following:

2. An **attestation signature** of school staff **attesting as** to verbal employment verification with the employer and the date of verification; and
3. An **attestation signature** of school staff **attesting as** to verbal employment verification with the graduate and the date of verification.

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...